Appendix A

This appendix includes the comments received in the Draft Environmental Impact Statement and response to those comments.

AR00000855

Federal Agencies

AR00000856

Preserving America's Heritage

January 27, 2009

Mr. Leslie T. Rogers
Regional Administrator
Federal Transit Administration Region IX
201 Mission St., Suite 1650
San Francisco, CA 94105-1839

RE: Honolulu High-Capacity Transit Corridor Project
Honolulu, Hawaii

Dear Mr. Rogers:

Consulting parties have recently contacted the Advisory Council on Historic Preservation (ACHP) with concerns about the effects of the referenced undertaking on historic properties, particularly visual effects that may result to the Pearl Harbor National Historic Landmark (NHL). The extent and complexity of the planned undertaking calls for the Federal Transit Administration (FTA) to provide appropriate guidance and oversight to its applicant, the City and County of Honolulu Department of Transportation Services (City) to ensure that consulting parties and other stakeholders are involved in consultation in keeping with the spirit and intent of the Section 106 implementing regulations, "Protection of Historic Properties" (36 CFR Part 800).

We would like to confirm our understanding that the FTA has not yet circulated a finding of effect for this undertaking as the City is presently conducting additional study and analysis of effects to historic properties in response to comments received from consulting parties during the recent circulation of a Draft Environmental Impact Statement (DEIS) for the project. Should the FTA conclude, following the results of this additional analysis and consultation with the Hawaii SHPO and other consulting parties, that the undertaking will adversely affect historic properties, or that the development of a Programmatic Agreement is necessary, the agency must notify the ACHP and provide the documentation detailed at 36 CFR § 800.11(e). The Hawaii State Historic Preservation Office (SHPO) has raised concerns about the proposed development of two Section 106 agreement documents should adverse effects result from the proposed undertaking. It is unclear to us how the FTA has proceeded to this point without ongoing consultation with all consulting parties. Further, we wish to clarify that, per the provisions of §800.6 of our regulations, a Section 106 agreement document should address all the adverse effects that may result from an undertaking. It therefore is inconsistent per 36 CFR Part 800 for the FTA to develop two agreement documents for this single undertaking.

ADVISORY COUNCIL ON HISTORIC PRESERVATION
1100 Pennsylvania Avenue NW, Suite 803 • Washington, DC 20004
Phone: 202-606-8503 • Fax: 202-606-8647 • achp@achp.gov • www.achp.gov

We request an update on the status of the Section 106 consultation for the Honolulu High-Capacity Transit Corridor as well as information about how the FTA is providing oversight to the City regarding the coordination of the historic preservation review and consultation with all consulting parties, including Native Hawaiian organizations. This information will help us respond to inquiries from consulting parties and members of the public who express concerns about the FTA's Section 106 coordination. We will also be able to better advise the FTA regarding interpretation of the regulations and procedural requirements.

We look forward to your response and to assisting the FTA with its responsibilities under the National Historic Preservation Act. If you have any questions, please contact Blythe Semmer by telephone at (202) 606-8552 or by e-mail at bsemmer@achp.gov.

Sincerely,

Charlene Dwin Vaughn, AICP
Assistant Director
Office of Federal Agency Programs
Federal Permitting, Licensing, and Assistance Section

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, 3RD FLOOR
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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT10/09-338202

Ms. Charlene Dwin Vaughn, Assistant Director
Advisory Council on Historic Preservation
Federal Permitting, Licensing, and Assistance Section
Office of Federal Agency Programs
1100 Pennsylvania Avenue N.W., Suite 803
Washington, D.C. 20004

Dear Ms. Vaughn:

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

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

At the time of issuance of the Draft EIS, the FTA had not submitted an Effects Determination Report. The Proposed Effects Determinations included in the Draft EIS were not formally submitted to the State Historic Preservation Division (SHPD) and, consequently, FTA had not received SHPD concurrence. The Draft EIS provided an opportunity for agencies and the public to review and comment on the preliminary determinations. The SHPD and other consulting parties provided substantive comments that have been considered and are reflected in the Honolulu High-Capacity Transit Corridor Project Historic Resources Effects Report (RTD 2009d) and summarized in Section 4.16, Archaeological, Cultural, and Historic Resources, in the Final EIS.

Based on concerns raised by Section 106 consulting parties, preliminary effects determinations as shown in the Historic Resources Technical Report (August 2008) and in the

Draft EIS (November 2008) were reevaluated and documented in a Historic Effects Report (April 2009). This report is available at the Department of Transportation Services, Rapid Transit Division office, at libraries, and on the project website (www.honolulutransit.org).

The Historic Effects Report showed that the Project will adversely affect a number of historic properties not discussed in the review conducted for the Draft EIS.

Both direct and indirect effects to historic properties were reconsidered in this report. Following consultation, SHPD concurred with the adverse effect findings and identified 11 additional resources as adversely affected. In July 2009, the FTA accepted the SHPD's opinion of effect on the additional resources. These determinations of effect are documented in Section 4.16 of the Final EIS.

The Programmatic Agreement (PA) related to the finding of adverse effect is included in the Final EIS as Appendix H, Section 106 of the National Historic Preservation Act Programmatic Agreement. As you know, ACHP participated in the development of the programmatic agreement during the Section 106 consultation process.

The FTA, ACHP and SHPD will execute a single programmatic agreement (PA) that includes both specific effects and mitigations to historic properties and a second part that is programmatic and addresses the level of exploration for sub-surface archaeological resources during the final design process and the treatment of any resources found.

FTA has provided direction as to the preparation of the PA and finding of effects. All Section 106 documentation has been circulated to all consulting parties. Historic properties were identified in the Historic Resources Technical Report *(RTD 2008); preliminary assessments of effect to these properties were also included in that document. As described, concerns from consulting parties regarding these initial effect assessments led to their reconsideration. Preliminary effect assessments as documented in the* Historic Resources Technical Report *(RTD 2008) were thus superseded by the findings documented in the* Historic Effects Report *(RTD 2009). Section 106 consultation with consulting parties, including correspondence, circulation of documentation, meetings, and site visits, is documented in both reports.*

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

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

United States Department of Agriculture

NRCS

Natural Resources Conservation Service
P. O. Box 50004
Honolulu, Hawaii 96850
(808) 541-2600

January 7, 2009

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

Thank you for providing the NRCS the opportunity to review the Honolulu High-Capacity Transit Corridor Project, Draft Environmental Impact Statement/Section 4(f) Evaluation. Previously, the NRCS has worked with the City and County of Honolulu and Ms. Amy Zaref, Project Manager from Parsons Brinckerhoff, on this project to provide the important Farmland information. We assisted in completing a Farmland Impact Conversion Rating Form (AD-1006) for this project. This form is required on projects that convert farmlands into non-farmland uses and have federal dollars attached to the project. See the website link below for more information on the Farmland Protection and Preservation Act (FPPA), and a copy of the AD-1006 form, with instructions.

Another area of potential concern are the impacts on wetlands. The NRCS Soil Survey of Oahu, Hawaii identifies areas of hydric soils. Hydric soils are potential areas of wetlands. If wetlands do exist, any proposed impacts to these wetlands would need to demonstrate compliance with the "Clean Water Act", and may need an Army Corps of Engineers 404 permit. The NRCS Soil Survey Maps are not provided with this report due to the extent of the project area. If you have any questions concerning hydric soils or obtaining NRCS Soil Survey information please contact us at the number provided below.

The NRCS Soil Survey is a general planning tool and does not eliminate the need for an onsite investigation. If you have any questions concerning the soils or interpretations for this project please contact, Tony Rolfes, Assistant State Soil Scientist, by phone (808) 541-2600 Ext. 129, or email, Tony.Rolfes@hi.usda.gov.

NRCS - Farmland Protection Policy Act Website: http://www.nrcs.usda.gov/programs/fppa/

Lawrence T. Yamamoto
Director
Pacific Islands Area

Cc
Michael Robotham
Mr. Ted Matley
FTA Region IX
201 Mission Street, Suite 1650
San Francisco, California 94105

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DEPARTMENT OF TRANSPORTATION SERVICES

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT1/09-294699R

Mr. Lawrence T. Yamamoto
Natural Resources Conservation Service
U.S. Department of Agriculture
P.O. Box 50004
Honolulu, Hawaii 96850

Dear Mr. Yamamoto:

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

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

Coordination regarding the Farmland Protection Policy Act has been ongoing between the City and NRCS. This coordination includes two submittals of the Form NRCS-CPA-106 with a request for NRCS to complete the corridor assessment scoring portion of the form. Only one corridor was evaluated in the Form NRCS-CPA-106 as only one alignment through farmlands were evaluated in the Draft and Final EISs. As defined in 7 CFR 658.4(c)(2), "Sites receiving a total score of less than 160 need not be given further consideration for protection and no additional sites need to be evaluated." The Project was given a Farmland Conversion Impact Rating Score of 120. On April 24, 2009, this final form was sent to you. Therefore, no further action is necessary for the Project regarding its compliance with the Farmland Protection Policy Act.

The two proposed alignments in the Draft EIS for the rapid transit route extend over 20 miles across southern Oahu. All of the crossings of named streams along this route were evaluated to determine whether the water bodies were navigable waters, waters of the U.S., or not waters of the U.S. Field investigations for waters of the U.S. were conducted along the project's alignment from December 2007 through January 2008 and from January 2009 through July 2009. Thirty-one sites were studied that were either streams or areas where there was the potential for wetlands. The results of this study are documented in the Wetland and Waters of U.S. Study (RTD2009b).

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

In addition, maps of wetland sites were also examined. There are three information sources for wetland sites:

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

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

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

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

DEPARTMENT OF THE ARMY
U.S. ARMY ENGINEER DISTRICT, HONOLULU
FORT SHAFTER, HAWAII 96858-5440

REPLY TO ATTENTION OF:

February 6, 2009

Regulatory Branch
Engineering and Construction Division

Corps File No.: POH-2007-127

Mr. Ted Matley
Federal Transit Administration, Region IX
201 Mission Street, Suite 1650
San Francisco, CA 94105

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

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DIRECTOR'S OFFICE
DEPT OF
TRANSPORTATION SERVICES

Dear Mr. Matley and Mr. Yoshioka:

This letter transmits our comments on the **Honolulu High-Capacity Transit Corridor Project** (Project) **Draft Environmental Impact Statement** (DEIS), dated November 2008. The document was jointly prepared by the U.S. Department of Transportation, Federal Transit Administration (FTA) and the City and County of Honolulu, Department of Transportation Services (DTS) to evaluate the environmental consequences of the proposed 23-mile rapid transit project located between Kapolei and University of Hawaii Mānoa on the Island of Oahu, Hawaii. Our comments are provided pursuant to the U.S. Army Corps of Engineers (Corps) regulatory authorities promulgated under Section 404 of the Clean Water Act (CWA) of 1972 and Section 10 of the Rivers and Harbors Act (RHA) of 1899. Our feedback is also guided by the Project's *Draft Coordination Plan* that was developed for this project pursuant to Section 6002 of the Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users (SAFTEA-LU) and our independent statutory responsibilities under the National Environmental Policy Act (NEPA) of 1969.

As a way of background, our role as an official cooperating agency is to ensure appropriate consideration of the aquatic ecosystem throughout the environmental review process. In doing so, we expect the Final EIS to be substantively sufficient for purposes of our agency's adoption in accordance with the Council on Environmental Quality's (CEQ) NEPA implementing regulations. Furthermore, our early involvement in the Project is intended to assist FTA and DTS in complying with all applicable federal laws that fall under our regulatory jurisdiction. Towards this end, my office has submitted comments on the Project in letters dated February 13, 2006[1]; April 10, 2007[2]; May 8, 2007[3] and September 16, 2008[4]. Our most recent review of the

[1] Letter from George P. Young, U.S. Army Corps of Engineers to Kenneth Hamayasu, DTS, regarding scoping and EIS Preparation Notice

public DEIS encompassed all pertinent documents provided to our agency, including, but not limited to:

- DEIS, Chapters 1 through 8 (FTA and DTS, November 2008);
- Appendix A of the DEIS: Conceptual Alignment Plans and Profiles (DTS, September 2008);
- Appendix C of the DEIS: Construction Approach (DTS, November 2008);
- Water Resources Technical Report (DTS, August 2008);
- Alternatives Analysis Report (DTS, November 2006); and
- Draft Coordination Plan (FTA and DTS, March 2007)

Based on our review, we found that a number of our agency's previous comments and concerns relating to the identification/delineation of waters of the United States, project impact assessment, the 404(b)(1) alternatives analysis, and proposed compensatory mitigation were not adequately addressed or incorporated into the DEIS. In the absence of this key information, we are unable to provide meaningful comments on the subject draft NEPA document as it relates to our statutory responsibilities. Moreover, these data and assessment deficiencies could adversely affect the timeliness and streamlining of our Department of the Army (DA) permit decision. Therefore, as a cooperating agency, we suggest the following comments be vetted and resolved, as appropriate, by the Federal lead and cooperating agencies prior to the next formal step in the NEPA process.

Aquatic Resources Data Gaps

According to the President's CEQ, an EIS must rigorously explore and objectively evaluate a reasonable range of alternatives, including the proposed action. One of the cornerstones of the NEPA process is the disclosure of the environmental consequences of the proposed action and its alternatives. An analytical evaluation of project impacts is necessary in order for a reviewer to sharply compare and contrast alternatives. While there is no mandate for a particular outcome or that the lead agency achieves particular substantive environmental results, a rigorous evaluation of alternatives is required to inform decision-makers of the likely environmental consequences, both detrimental and beneficial, of the alternatives. The preface of the Project's DEIS acknowledges the purpose of the document is to "...provide...[a] full and open analysis of costs, benefits, and environmental impacts of alternatives considered...", yet based on our review of the document, we do not concur that some of these basic NEPA tenets have been adequately fulfilled.

Irrespective of the NEPA precept of a concise environmental document, at the project-specific DEIS stage we require greater specificity and disclosure of quantitative data regarding the aquatic environment. We note neither the Water Resources Technical Report (WRTR) nor Chapter 4 of the DEIS (*Environmental Analysis, Consequences and Mitigation*) contains

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[2] Letter from George P. Young, U.S. Army Corps of Engineers to Kenneth Hamayasu, DTS, regarding NEPA scoping comments in response to FTA's NOI

[3] Letter from LTC Charles H. Klinge, U.S. Army Corps of Engineers to Leslie T. Rogers, FTA, regarding cooperating agency status and SAFETEA-LU coordination plan

[4] Letter from George P. Young, U.S. Army Corps of Engineers to Wayne Yoshioka, DTS, regarding comments on

information on: 1) the geographic boundaries of waters of the U.S., including wetlands; 2) quantitative data documenting the areal extent of direct and indirect impacts for each of the proposed build alternatives (e.g., footprint of disturbance); and 3) specific documentation of how the Project will avoid and minimize impacts to aquatic resources to the maximum extent practicable. In previous correspondence, the Corps requested the DEIS include these standard analytical and procedural requirements in order to document our geographic scope of jurisdiction and to characterize the functional losses to the aquatic ecosystem, if any, as a result of project implementation. Both aspects are fundamental to our regulatory program and DA permit decisions.

Notwithstanding the aforementioned data omissions, we offer the following specific comments on the presence/absence of aquatic resources, the analysis of impacts on the aquatic environment and proposed mitigation.

- Table 4-1 in the WRTR identifies 18 streams/waterways that occur within the study area, whereas Table 4-25 in the DEIS depicts 17 streams; the Ala Wai Canal is excluded in the latter. A third matrix, entitled "Streams in the Study Corridor" was distributed for discussion purposes during our December 2008 agency coordination meeting. This table lists 20 streams occurring in the study area that could be affected by the Project. The Corps recommends any discrepancies with the various tables be reconciled and a clear, comprehensive accounting of the existing aquatic resources within the study area be presented.

- Page 4-130 of the DEIS indicates "...wetland areas are listed in Table 4-28..." However, the aquatic resources called out in Table 4-28 do not appear to be classified or delineated based on the Corps' 1987 Wetlands Delineation Manual (manual) and other current Corps policy. For example, nine of these water resources listed in Table 4-28 are described as concrete channels or concrete culverts, which generally are not known to support hydric soils (unless they maintain a natural channel invert), and therefore would not be considered wetlands. The Corps suggests this table be reviewed and modified, as appropriate, to categorize or otherwise identify water resources that constitute a "wetland" based on the Corps methodology.

- We noted inconsistencies with respect to the conclusions made in the DEIS regarding environmental consequences. For instance, page 4-135 of the DEIS states that mitigation is not required because no impacts to wetlands are expected, although page 4-159, Section 4.17.7 (*Natural Resources*), indicates "...[C]onstruction activities could affect wildlife, vegetation, wetlands and streams near the Project." [Emphasis added]. The Corps recommends clarification on the conclusions of the water resources impact analysis. We also suggest a reference or citation be provided in the DEIS that directs the reader to the actual field data and detailed analysis that substantiate the findings.

- While Section 4.13.3 of the DEIS (page 4-131) asserts: "...the project would not adversely affect water resources...", page S-1 of the WRTR states: "Piers to support the guideway may have to be located in some streams." Similar statements on page 6-1 of the WRTR and page 4-132 of the DEIS indicate: "[A]ny piers in streams would be

placed to line up with existing bridge structures when feasible...[a]reas where elevated structures would cross navigable waterways have been identified and consultation with the Coast Guard in underway to address effects" We infer from these statements that there would be direct impacts to [potential] waters of the U.S., likely requiring review and authorization under Section 404 of the CWA and/or Section 10 of the RHA. The Corps suggests this section of the DEIS be clarified.

- Subsequent to the release of the DEIS, the Corps was informed that there may be construction methodologies that could result in direct impacts to waters of the U.S., such as the use of coffer dams (pers. comm., Amy Zaref et al., December 16, 2008). Therefore, we recommend the Final EIS identify all project features and construction methodologies that may affect waters of the U.S. FTA and DTS should provide an explicit accounting of what waterways and wetlands will be impacted, including an estimate of the footprint of disturbance (e.g., acres) and the type of impact (e.g., direct, indirect, permanent, temporary, and so forth). In order to accomplish this, a formal JD must be undertaken by a qualified consultant and verified by the Corps. Information contained in the JD, in conjunction with detailed engineering plans, should then be used to substantiate the presence/absence of jurisdictional waters of the U.S. and whether impacts would result from implementation of the proposed build alternatives.

- Section 4.13.1 of the DEIS (*Regulatory Context*) indicates the Corps regulates activities in jurisdictional waters pursuant to Section 10 of the RHA and Section 103 of the Marine Protection, Research and Sanctuaries Act of 1972, however, omits the fact we also regulate activities that involve the discharge of dredged or fill material in jurisdictional waters of the U.S. under Section 404 of the CWA. Although a separate subheading entitled "*Wetlands*" (page 4-128) correctly explains the Corps regulates wetlands under Section 404 of the CWA, it does not explicitly acknowledge that we regulate activities that discharge fill material into other types of waters of the U.S., such as non-wetland tributaries. Therefore, the text of the DEIS should be modified to clarify the scope of our jurisdiction under Section 404 of the CWA. Unless FTA and DTS intend to transport dredged or fill material for ocean disposal, the Corps does not anticipate our authorities under Section 103 of the MPRA will be relevant to this Project.

- Page 4-134 of the DEIS indicates verbatim: "...[A] letter has been sent to the Army Corps of Engineers asking for their jurisdictional determination concurring that the Project will not have a direct impact on wetlands." We are concerned with the accuracy of this statement, as the Corps has not received a letter from the Project proponent or its designated agent requesting our jurisdictional determination (JD). Further, we have not received a draft JD report prepared in accordance with the 1987 Wetlands Delineation Manual, 33 C.F.R. § 328.3(d) and 33 C.F.R. § 328(e) to review and approve. For this reason, we request this statement be stricken from the DEIS or substantially modified to accurately portray the status of coordination with our office on the Project's JD.

Based on recent coordination with your consultant team, we understand the aforementioned data gaps are under development and that site-specific information will be forthcoming. It is not clear, however, how this yet-to-be obtained information will be incorporated into the DEIS and

considered by the public and agency decision-makers prior to the final determination of a federally preferred alternative. Again, due to the absence of a geographic JD, we are unable to determine the extent, intensity and permanence of impacts to the aquatic ecosystem. At this time, we are also precluded from weighing in on the adequacy of a 404(b)(1) alternatives analysis, appropriate mitigation, and the possible identification of the least environmentally damaging practicable alternative (LEDPA).

Alternatives Analysis

The purpose of the Project is to: "...[p]rovide high capacity rapid transit in the highly congested east-west transportation corridor, between Kapolei in the west and University of Hawaii, Mānoa in the east, as specified in the *Oahu Regional Transportation Plan 2030*" (page 1-19). A number of alternatives were initially examined, but rejected as part of the Alternative Analysis process conducted by DTS in 2006. The Alternative Analysis Report evaluated four alternatives, including the No Build, Transportation System Management, Express Buses Operating in Managed Lanes, and Fixed Guideway Transit System. The latter was selected by the City Council as the locally preferred alternative. According to the DEIS, the NEPA scoping process confirmed that there were no other available alternatives that would satisfy the project purpose at less cost, with greater effectiveness or less environmental or community impact.

The 404(b)(1) Guidelines[5] impose substantive requirements on the applicant with respect to the alternatives analysis and the sequenced search for the LEDPA. These guidelines are heavily weighted towards preventing environmental degradation of waters of the U.S. The regulation specifically requires that no discharge of dredged or fill material shall be permitted if there is a practicable[6] alternative to the proposed discharge which would have less adverse impact on the aquatic ecosystem, so long as the alternative does not have other significant adverse environmental consequences [40 C.F.R. § 230.10(a)]. Section 4.13.1 of the DEIS (*Background and Methodology*) appropriately acknowledges the applicant must conduct a 404(b)(1) alternatives analysis, however, we were unable to locate this analysis within the DEIS, its appendices or technical studies. Presuming this analysis has not yet been prepared, there is no reference in the DEIS as to when it might be performed.

Generally, if the NEPA alternatives analysis is adequately robust with respect to the aquatic ecosystem impacts such that it demonstrates that the proposed activity is the LEDPA, then it can duly serve to fulfill the 404(b)(1) alternatives analysis requirement. Otherwise, a separate alternatives analysis must be conducted to provide greater specificity and/or a modified range of alternatives in order to satisfy the substantive criteria of the Guidelines (i.e., the identification of the LEDPA). It is germane to note that if it is otherwise a practicable alternative, an area not presently owned by the applicant which could be reasonably obtained, utilized, expanded or managed in order to fulfill the basic purpose of the proposed project may be considered under the Guidelines. NEPA has similar language in which it requires that even if an alternative is not

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the administrative draft EIS

[5] U.S. Environmental Protection Agency, 404(b)(1) Guidelines, 40 C.F.R. § 230 (45 FR 85336 – 85357, dated December 24, 1980)

[6] "Practicable" is defined in regulation as being available and capable of being done after taking into consideration cost, existing technology and logistics in light of the overall project purpose.

within the lead agency's jurisdiction it should be rigorously analyzed in the EIS if it is reasonable and achieves the project purpose [40 C.F.R. 1506.2(d)]. Despite some alternatives being outside the control or legal jurisdiction of the lead agency, their inclusion in the EIS helps to provide a sharper contrast among alternatives and informs the public as well as decision-makers of the environmental consequences (beneficial or detrimental) of alternative actions.

For the Honolulu High-Capacity Transit Corridor project, the range of alternatives includes the No Action alternative plus one build alternative with two alignment variations. The alignments considered in the DEIS are: 1) the Honolulu International Airport variation, 2) the Salt Lake Boulevard variation, and 3) implementation of both the Airport and Salt Lake Boulevard variations. Aside from the area between Aloha Stadium and Kalihi where the alignment varies, the alternatives traverse the same footprint for the majority of the19-mile length. In fact, the DEIS states: "...the guideway would follow the same alignment for all Build Alternatives through most of the study corridor, except between Aloha Stadium and Kalihi." (pages S-4, 2-9). In consideration of the requirements of the 404(b)(1) Guidelines, the Corps recommends FTA and DTS carefully examine and clearly document the environmental differences between the build alternatives/alignments and provide documentation that there is no other practicable alternative—other than the locally preferred alternative—that would have less adverse impact on the aquatic ecosystem.

Cumulative Effects

According to the DEIS, the proposed transportation corridor is approximately 23 miles in length, of which a detailed environmental evaluation was conducted for a core 19 miles located between East Kapolei and Ala Moana Center. Future transit extensions to West Kapolei and UH Mānoa and Waikiki may occur, but are only considered in the DEIS in the context of cumulative effects. We agree this is an appropriate approach for potential future Project extensions that currently have not been approved, designed or funded. The NEPA requires that the lead agency take a hard look at alternatives and the resultant environmental consequences to enable informed agency decisions. Environmental consequences may be beneficial or adverse, but in all cases, the direct, indirect and cumulative impacts must be assessed and disclosed within the NEPA document. We found the Project's cumulative impact analysis for waters of the U.S. to lack sufficient analytical detail and robustness for purposes of public disclosure and agency decision-making. A meaningful cumulative impact assessment includes an evaluation of the historic and current conditions of the environmental resource of interest, a thorough accounting of past, present and reasonably foreseeable future projects and how such projects affect a given environmental resource when assessed in the aggregate.

The cumulative impacts to waters of the U.S. must be considered in the context of the pre-established geographic boundaries for the wetlands/waters cumulative effects analysis. The impacts that would result from the Project's build alternatives must be evaluated in comparison to the quantity and quality of aquatic resources occurring within the geographic study area and in consideration of other stressors or impacts resulting from past, present and reasonably foreseeable projects. That is, it may be that the resulting impacts from the Honolulu High-Capacity Transit Corridor project alternatives are, individually, deemed minimal when compared to the overall Project footprint of disturbance, but when the project impacts are compared to the

already diminished extent and health of wetlands existing within the study area, such impacts could be considerably more substantial. The discussion of the water resources cumulative effects offered in Section 4.18.3 (page 4-174) is inadequate to enable a fair and objective evaluation of cumulative impacts. Therefore, the Corps recommends the text be expanded to better address the suggestions outlined above.

Compensatory Mitigation

For projects evaluated under Section 404 of the CWA, no discharge of dredged or fill material into waters of the U.S. can be approved that does not meet the requirements of the 404(b)(1) Guidelines. Guidance for implementing the 404(b)(1) Guidelines is provided through the joint Corps-EPA 1990 Mitigation Memorandum of Agreement (MOA) and the new Compensatory Mitigation Rule[7], which supersedes certain provisions of the 1990 MOA. Among other things, the MOA states that compensatory mitigation may not be used as a method to reduce environmental impacts in the evaluation of the alternatives for the purposes of requirements under 40 C.F.R. Section 230.10(a).

The Corps anticipates providing feedback on the draft 404(b)(1) alternatives analysis as the environmental process moves forward. In general, however, the following sequence of determinations will be used in evaluating the Project:

- A determination that potential impacts have been avoided to the maximum extent practicable;
- A determination that remaining unavoidable impacts will be mitigated to the extent appropriate and practicable by requiring measures to minimize impacts through project modifications and permit conditions; and
- A determination that appropriate and practicable compensatory mitigation has been provided for unavoidable adverse impacts.

The DEIS should document an explicit and transparent link between project impacts and proposed mitigation. Under the new Compensatory Mitigation Rule, greater flexibility exists for permittee-responsible mitigation through on-site and off-site mitigation. The same holds true for out-of-kind mitigation. In general, however, implementation of compensatory mitigation should occur on-site unless it is demonstrated there is no practicable opportunity for on-site mitigation or if off-site mitigation provides greater ecological benefits. Compensatory mitigation should also occur within the same watershed of impact whenever possible. If compensatory mitigation is recommended to occur outside the watershed of impact, a sound ecological rationale must be presented as to why it is the most practicable choice.

In our previous comment letters, we cautioned DTS about deferring specific mitigation planning to the permitting stage of this project. In our view, it is important that discussions with

[7] Final Rule, Compensatory Mitigation for Losses of Aquatic Resources (Corps and EPA, April 10, 2008; 73 FR 19594 - 19705).

key regulatory and resource agencies related to compensatory mitigation begin at this phase of the NEPA process and continue throughout the permit process. Also, it is noteworthy to point out that the new Compensatory Mitigation Rule requires our Public Notice (PN) for the preferred alternative contain a statement explaining how impacts associated with the proposed action are to be avoided, minimized and compensated for and that a final mitigation plan be approved by our district engineer prior to issuance of an individual permit. Therefore, it is important that at the time of issuance of our PN the mitigation proposal is specific enough for the public to offer meaningful comments on its appropriateness and effectiveness.

Should your augmented impact analysis for aquatic resources determine there are unavoidable adverse impacts to waters of the U.S., we expect a draft compensatory mitigation plan to be prepared in accordance with Honolulu District's Mitigation and Monitoring Guidelines and the Final Compensatory Mitigation Rule. At a minimum, this plan should include the following: 1) a direct correlation between project impacts and proposed mitigation to offset the loss in functional value; 2) the specific functions and values expected to be gained through the proposed establishment, restoration, enhancement and preservation efforts; 3) a schedule for implementation; and 4) an evaluation and monitoring plan.

In addition, it may be prudent to consider implementation of certain components of the compensatory mitigation plan in advance of the impacts occurring, which may then reduce the temporal losses associated with project construction.

NEPA Procedural Requirements

As a cooperating agency with both special expertise and jurisdiction by law, we intend to adopt FTA's Final EIS for compliance with the Corps' independent NEPA responsibilities for our federal action (i.e., DA permit decision). In doing so, we will be required to issue a Notice of Intent in the Federal Register and prepare our own Record of Decision (ROD). The Corps' ROD will constitute our agency's decision document and will be relied upon for the final DA permit decision. As part of agency decision-making, the Corps will need written evidence from FTA that compliance with Section 7 of the Endangered Species Act and Section 106 of the National Historic Preservation Act has been achieved. Similarly, prior to a DA permit decision, the Corps must have evidence that the Project has obtained Section 401 of the CWA certification (or waiver thereof) and Section 307(c) of the Coastal Zone Management Act consistency (or exemption).

Public Interest Review

Lastly, our project evaluation process requires we balance the project purpose against the public interest. The public benefits and detriments of all factors relevant to this transportation project will be carefully reviewed and considered. Relevant factors may include, but are not limited to, conservation, economics, aesthetics, wetlands, cultural values, fish and wildlife values, water quality, and any other factors judged important to the needs and welfare of the people. The following general criteria will be considered in evaluating the Honolulu High-Capacity Transit Corridor project application:

- The relevant extent of public and private needs
- Where unresolved conflicts of resource use exist, the practicability of using reasonable alternative locations and methods to accomplish project purposes; and
- The extent and permanence of the beneficial and/or detrimental effects the proposed project may have on public and private uses to which the area is suited.

No DA permit can be granted if the project is found to be contrary to the public interest. We anticipate working with FTA, DTS, other key agencies and interested parties in the documentation of our public interest review.

We appreciate the opportunity to comment on the Project's DEIS. Our goal is to ensure the environmental review process is appropriately comprehensive, technically sound and transparent to enable meaningful public participation and informed agency decision-making. We look forward to continuing our dialogue with your respective offices as well as your consultant team. If you have any questions or concerns, please contact Ms. Susan A. Meyer of my staff at (808) 438-2137or by electronic mail at susan.a.meyer@usace.army.mil. Please refer to the Corps File No. POH-2007-127 in any future correspondence or communications related to this project.

Sincerely,

for George P. Young, P.E.
Chief, Regulatory Branch

Copies Furnished:

Mr. Alec Wong, Chief, Clean Water Branch, State Dept of Health
Mr. John Nakagawa, Office of Planning, State Coastal Zone Management Program
Mr. Michael Molina, U.S. Fish and Wildlife Service, Honolulu
Dr. Lance Smith, Protected Resources Division, NOAA Fisheries
Mr. Gerry Davis, Habitat Conservation Division, NOAA Fisheries
Dr. Wendy Wiltse, U.S. Environmental Protection Agency, Honolulu

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT2/09-299501R

Mr. George P. Young, Chief
Regulatory Branch
Department of the Army
U.S. Army Engineer District
Fort Shafter, Hawaii 96858-5440

Dear Mr. Young:

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

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

Aquatic Resources

Coordination with Federal, State, and Local agencies with water resource expertise and responsibilities has been ongoing to provide input and guidance on the resources, design, and construction of the Project. Coordination will continue as appropriate with regulatory agencies throughout final design and construction. Since publication of the Draft EIS, several meetings have been held with the USACE December 9, 2008, January 15, February 25, May 13, July 3, and August 10, 2009. DTS appreciates the time the USACE has taken to review the Project materials required to fill the aquatic resource data gaps.

Sections 4.14 and 4.18.10 of this Final EIS have been revised to include the deficiencies and clarify the discrepancies identified by the USACE in the Draft EIS. These revisions occurred in the following water resource areas:

- *Regulatory authority of the USACE.*
- *Identification and delineation of waters of the U.S.*
- *Project impact assessment for waters of the U.S. (permanent and temporary).*
- *The 404(b)(1) alternatives analysis.*
- *Mitigation to waters of the U.S.*

USACE guidance permits the use of a preliminary jurisdictional determination (JD) approach to satisfy NEPA requirements. The "preliminary JD" approach is being followed for this Project. Under this approach, areas that are potentially waters of the U.S. are considered to be waters of the U.S. For the purposes of this document, all waters (including intermittent and ephemeral streams) are considered waters of the U.S. if they fit the definitions of tidal, wetland, RPW, or non-RPW waters, unless otherwise stated. The Wetland and Waters of the U.S. Study (RTD 2009b) provides additional information on areas being covered under preliminary JDs which is also documented in Section 4.14 of the Final EIS. The Final EIS also includes an evaluation of impacts to waters of the U.S. (See Section 4.14.4 in this Final EIS).

On September 15, 2009, the Army Corps of Engineers stated in a letter that its substantive concerns relating to Section 404 of the Clean Waters Act had been addressed and that the scope and intensity of impacts to jurisdictional waters of the United States are now relatively minor due to the extent of avoidance and minimization of impacts on the aquatic environment resulting from project site selection and design. This letter is in Appendix F of this Final EIS. There will be impacts to waters of the U.S by the Project. Transit guideway support columns will be placed in Waiawa, Moanalua, and Nuuanu Streams. In addition, the Project will be widening the existing Dillingham Boulevard Bridge at Kapalama Stream which will require extension of the existing piers and abutments. The total permanent impacts from structural elements of the Project is 0.02 acres. An existing stormwater outfall in Waiawa Springs will be extended at the Pearl Highlands Station to reduce ponding (total impact is 0.06 acres). For all work in waters of the U.S., the City will apply for USACE Section 404 nationwide permits for impacts to waters under the jurisdiction of the Corps where impacts could not be avoided.

Permanent mitigation features are proposed at Waiawa Stream, within the Pearl Highlands Station, see Figure 4-62 in the Final EIS. This approximately 17-acre site provides sufficient space for mitigation since only approximately 5 acres will be required for the station, leaving the remainder of the site available for mitigation. Regulations suggest, but do not require, mitigation within the same watershed. Impacts from the Project amount to several small impacts in different watersheds. Individually these would be difficult to mitigate separately (i.e., keep within the same watershed as the impact) to achieve lasting compensation. Impacted watersheds could be more broadly defined on the basis of the nearby receiving waterbody for the impacted estuary; these are Pearl and Honolulu Harbors and Ke'ehi Lagoon. Of the three,

Pearl Harbor has the greatest potential for benefit from a mitigation effort directed at improving function within a contributing stream system. This is because it is the largest of the estuarine environments (i.e., of a type closer to the environments impacted) and is the most enclosed. As a result, it is more sensitive to land impacts than Ke'ehi Lagoon or Honolulu Harbor. The proposal is to consolidate mitigation to a single site (Site 12) Figure 4-62 and Figure 4-67 in the Final EIS, on Waiawa Stream. Waiawa Stream was selected over an estuary location because of the availability of land that is part of the Project where enhancement of the stream and potential establishment of a riverine wetland are possible with a high degree of long-term success. The mitigation area would become part of the Project. Although the Project will have minimal effect on the stream, Figure 4-62 in the Final EIS, it will have a considerable effect on the riparian area at that location. Waiawa Springs (Site 13) Figure 4-62 and Figure 4-67 in the Final EIS, is under the jurisdiction of the USACE. The impact area of constructing a culvert to direct the stormwater outfall and spring flow away from under the Pearl Highlands Station is greater (0.06 acre) than all the permanent impacts from the guideway (0.02 acre). Mitigation in this location can also be used to improve the existing outfall, improve water quality, and enhance the natural setting of the station.

As discussed in Section 4.18, during construction of the linear transportation features of the Project, it is anticipated that there will also be a temporary effect of up to 0.13 acre of waters of the U.S.

A "functional assessment" was also performed for each location where the Project is adjacent to or crosses waters of the U.S., as identified in the Wetland and Waters of the U.S. Study (RTD 2009b). Given this level of impact to water resources within Honolulu's urban core, the intent of the functional assessment was to analyze impacts of the aquatic ecosystem to develop mitigation concepts for those waters of the U.S. where impacts could not be avoided and only after impacts were minimized to the extent feasible.

Alternatives Analysis

Additional discussion regarding the consideration of aquatic resources that is documented in previous studies is now more clearly summarized in Chapter 2, Alternatives Considered, in this Final EIS and Section 4.14.4, includes an analysis of alternatives to meet the requirements of the Clean Water Act 404(b)(1) Analysis. As noted by the USACE, the City has avoided and minimized impacts to waters of the U.S. which has resulted in relatively minor impacts to jurisdictional waters of the U.S.

Cumulative Effects

Section 4.19.3 Cumulative Effects, in this Final EIS has been refined to add detail regarding past actions as well as to elaborate upon how past actions have affected water resources and how water resources will be effected cumulatively by the aggregate of both the Project and reasonably foreseeable future projects.

NEPA Procedural Requirements

The required documentation of compliance with the Section 7 of the Endangered Species Act and Section 106 of the National Historic Preservation Act are in this Final EIS Sections 4.13 and 4.16. Prior to the USACE's permit decision, DTS understands the need to meet the requirements for Sections 401 and 404 of the CWA and Section 307(c) of the Coastal Zone Management Act.

Agency Coordination

The City will continue to work with the USACE to ensure that the USACE receives all of the necessary documentation to satisfy its public interest review criteria.

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

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

243193

U.S. Department of Homeland Security

United States Coast Guard

Commander
Fourteenth Coast Guard District

300 Ala Moana Blvd, 9-216
Honolulu, HI 96850-4982
Staff Symbol: (dpw)
Phone: (808) 535-3412
Fax: (808) 535-3414
Email: Douglas.a.jannusch@uscg.mil

16590
DEC 23 2008

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

Dear Mr. Yoshioka,

As a cooperating agency for the Honolulu High Capacity Transit Corridor project, we appreciate the opportunity to review both the Administrative Draft Environmental Impact Statement (DEIS) dated 1 August 2008 and the November 2008 public copy. Per our letter to Mr. Leslie Rogers at the Federal Transit Administration dated 28 September 2007, the Coast Guard had identified every impacted waterway but was still determining each waterway's navigability.

This review, as well as associated impacts to navigation resulting from the project, has been completed. Table 4-25 of the DEIS identifies 17 streams within the study corridor. During our review, however, we considered not only the currently planned route (including alternatives), but also all future planned extensions. Doing so added Makakilo Gulch near the proposed Fort Barrette Road Station and Ala Wai Canal near the proposed Convention Center Station. Additionally, we added Kalauao Springs Stream, Aolele Street Ditch and Kahauiki Stream, which are all within the study corridor but not included on table 4-25.

Enclosure (1) details the results of our analysis. Out of the 22 streams reviewed, eight are considered navigable and subject to Coast Guard jurisdiction. However, at the elevated guideway's proposed location over each of these eight streams, no vessels other than canoes, rowboats, rafts and small motorboats would be able to transit the waterway. Therefore, pursuant to 33 CFR 115.70, the Coast Guard grants advance approval to the location and plans for the guideway over the eight streams. The clearances provided as part of the elevated guideway system are considered adequate for meeting the reasonable needs of navigation, and, in fact, are greater than those of the bridges already in place over these streams. Accordingly, Coast Guard bridge permits will not be required for the project. Pursuant to 33 CFR 118.40, the project is also exempted from providing bridge lighting on the guideways over each navigable stream.

This authorization is valid for a period of two years to commence construction. With respect to completion of the guideway over each affected navigable stream, the Coast Guard accepts the project timeline as proposed in figure 2-45 of the DEIS. Should you not adhere to this time frame, you must resubmit documents for Coast Guard review to ensure that conditions have not changed that would preclude the project from meeting the criteria for advance approval. This determination does not relieve you of your responsibility to obtain appropriate permits from any other federal, state or local agency having jurisdiction in this matter.

Because identification of a waterway as an Advance Approval Waterway is not a major federal action for purposes of the NEPA, and is in fact a categorical exclusion, the Coast Guard requests to alter its affiliation with this project from a cooperating agency to a participating agency.

If you have any questions or concerns, please do not hesitate to contact my representative in this matter, LT Doug Jannusch, at (808) 535-3412 or Douglas.A.Jannusch@uscg.mil.

Sincerely,

W. R. MARHOFER
Captain, U. S. Coast Guard
Chief, Prevention Division
By direction

Enclosures: (1) – (25) Coast Guard Waterway Determinations and Photos for Streams Within Study Corridor

Copy: Commandant, Coast Guard Headquarters, Bridge Administration Division (CG-5411)

RECEIVED
08 DEC 26 P2:23
DIRECTOR'S OFFICE
DEPT. OF TRANSPORTATION SERVICES

Stream or Waterway	Approximate Location	Estimated Guideway Ht above Strm	Navigability at Guideway Crossing	USCG Determination	Bridge Permit Req'd	Encl. No.
Makakilo Gulch	Fort Barrette Road Station	Unknown	Not Navigable	Not Navigable	No	2
Kalo'i Gulch	Kapolei Parkway & UH West Oahu Stations	Unknown	Not Navigable	Not Navigable	No	3
Honouliuli Stream	Old Fort Weaver Road	52 feet	Not Navigable	Not Navigable	No	4
Ho'ae'ae Stream	West Loch Station	33 feet	Not Navigable	Not Navigable	No	5
Waikele Stream	Waipahu Cultural Gardens	37 feet	Navigable	Advance Approval	No	6
Kapakahi Stream	Waipahu Transit Center	30 feet	Not Navigable	Not Navigable	No	7
Waipahu Canal (Makalena Str)	Waipahu Transit Center	33 feet	Navigable	Advance Approval	No	8
Waiawa Stream	Pearl Highlands Station	82 feet	Not Navigable	Not Navigable	No	9
Pearl City Stream	Waimano Home Road	24 feet	Not Navigable	Not Navigable	No	10
Waiau Stream	East of Kuleana Rd, West of Waimalu Str.	21 feet	Not Navigable	Not Navigable	No	11
Waimalu Stream	Pearlridge Station	23 feet	Navigable	Advance Approval	No	12
Kalauao Springs Str	Pearlridge Station	23 feet	Not Navigable	Not Navigable	No	13
Kalauou Stream	Pearlridge Station	33 feet	Not Navigable	Not Navigable	No	14
Aiea Stream	Aloha Stadium	28 feet	Not Navigable	Not Navigable	No	15
Halawa Stream	Arizona Memorial & Salt Lake	39 & 37 feet	Not Navigable	Not Navigable	No	16 & 17
Aolele Street Ditch	Lagoon Drive Station	28 feet	Not Navigable	Not Navigable	No	18
Moanalua Stream	Nimitz Highway & Pukoloa St.	48 & 27 feet	Navigable	Advance Approval	No	19 & 20
Kahauiki Stream	Pukoloa St.	37 feet	Not Navigable	Not Navigable	No	21
Kalihi Stream	Middle Street Transit Center	43 feet	Navigable	Advance Approval	No	22
Kapalama Canal	Kapalama Station	23 feet	Navigable	Advance Approval	No	23
Nu'uanu Stream	Chinatown Station	38 feet	Navigable	Advance Approval	No	24
Ala Wai Canal	Convention Center Station	Unknown	Navigable	Advance Approval	No	25

ENCLOSURE( )

AR00000878

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT12/08-293103R

W.R. Marhoffer, Captain
U. S. Coast Guard
U.S. Department of Homeland Security
300 Ala Moana Boulevard, Room 9-216
Honolulu, Hawaii 96850-4982

Dear Captain Marhoffer:

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

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

Table 4-25 from the Draft EIS was updated and appears as Table 4-26 in the Final EIS. It reflects all the streams within the corridor along with the Coast Guard's navigability determinations.

The assessment regarding elevation and clearance under the guideway is correct.

DTS appreciates the Coast Guards' efforts on the Project and understand the requirement to resubmit documents for Coast Guard review if the proposed timeframe for construction changes.

In response to your comment, the status for the Coast Guard has been changed to "participating" in Section 8.2.2, Government and Other Agency Coordination, of this Final EIS.

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

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

U.S. Department of Homeland Security
FEMA Region IX
1111 Broadway, Suite 1200
Oakland, CA. 94607-4052

FEMA

December 12, 2008

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

Dear Mr. Yoshioka:

This is in response to your request for comments on the Honolulu High-Capacity Transit Corridor Project Draft Environmental Impact Statement/Section 4(f) Evaluation.

Please review the current effective Flood Insurance Rate Maps (FIRMs) for the City and County of Honolulu (Community Number 150001), Map revised June 2, 2005. Please note that the City and County of Honolulu, Hawaii are participants in the National Flood Insurance Program (NFIP). The minimum, basic NFIP floodplain management building requirements are described in Vol. 44 Code of Federal Regulations (44 CFR), Sections 59 through 65.

A summary of these NFIP floodplain management building requirements are as follows:

- All buildings constructed within a riverine floodplain, (i.e., Flood Zones A, AO, AH, AE, and A1 through A30 as delineated on the FIRM), must be elevated so that the lowest floor is at or above the Base Flood Elevation level in accordance with the effective Flood Insurance Rate Map.

- If the area of construction is located within a Regulatory Floodway as delineated on the FIRM, any ***development*** must not increase base flood elevation levels. **The term *development* means any man-made change to improved or unimproved real estate, including but not limited to buildings, other structures, mining, dredging, filling, grading, paving, excavation or drilling operations, and storage of equipment or materials.** A hydrologic and hydraulic analysis must be performed *prior* to the start of development, and must demonstrate that the development would not cause any rise in base flood levels. No rise is permitted within regulatory floodways.

- All buildings constructed within a coastal high hazard area, (any of the "V" Flood Zones as delineated on the FIRM), must be elevated on pilings and columns, so that the lowest horizontal structural member, (excluding the pilings and columns), is elevated to or above the base flood elevation level. In addition, the posts and pilings foundation and the structure attached thereto, is anchored to resist flotation, collapse and lateral movement due to the effects of wind and water loads acting simultaneously on all building components.

- Upon completion of any development that changes existing Special Flood Hazard Areas, the NFIP directs all participating communities to submit the appropriate hydrologic and hydraulic data to FEMA for a FIRM revision. In accordance with 44 CFR, Section 65.3, as soon as practicable, but not later than six months after such data becomes available, a community shall notify FEMA of the changes by submitting technical data for a flood map revision. To obtain copies of FEMA's Flood Map Revision Application Packages, please refer to the FEMA website at http://www.fema.gov/business/nfip/forms.shtm.

Please Note:

Many NFIP participating communities have adopted floodplain management building requirements which are more restrictive than the minimum federal standards described in 44 CFR. Please contact the local community's floodplain manager for more information on local floodplain management building requirements. The Honolulu floodplain manager can be reached by calling Mario Siu Li, at (808) 768-8098.

If you have any questions or concerns, please do not hesitate to call Cynthia McKenzie of the Mitigation staff at (510) 627-7190.

Sincerely,

Gregor Blackburn, CFM, Branch Chief
Floodplain Management and Insurance Branch

cc:
Ted Matley, FTA Region IX
Mario Siu Li, NFIP Coordinator, City and County of Honolulu
Carol Tyau-Beam, State of Hawaii, Department of Land and Natural Resources
Cynthia McKenzie, Senior Floodplanner, CFM, DHS/FEMA Region IX
Alessandro Amaglio, Environmental Officer, DHS/FEMA Region IX

DEPARTMENT OF TRANSPORTATION SERVICES

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MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT12/08-291950R

Mr. Gregor Blackburn, Chief
Floodplain Management and Insurance Branch
Federal Emergency Management Agency
Region IX
U.S. Department of Homeland Security
1111 Broadway, Suite 1200
Oakland, California 94607-4052

Dear Mr. Blackburn:

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

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

The current Flood Insurance Rate Maps for the City and County of Honolulu have been reviewed with the hydrological and hydraulic studies for this Project. The flood zones and their associated water bodies within the study corridor are presented in Section 4.14.2, Affected Environment [Water], and Table 4-29, Streams Having FEMA Mapped Flood Zones, in this Final EIS.

Structures associated with the Project will be elevated so that the lowest floor is at or above Base Flood Elevation levels in accordance with the effective Flood Insurance Rate Map.

More detailed hydrological and hydraulic studies are ongoing. Should these studies show any potential rise, the design will be changed so that when the Project is constructed there will be no rise in the base floodplain elevations as required by FEMA.

The Project meets the requirements for construction within a coastal high hazard area, including elevation of lowest horizontal structural member, resistance to water loads, and resistance to wind loads.

DTS will comply with FEMA's requirements for a FIRM revision if it is necessary, in accordance with 44 CFR, Section 65.3.

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

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Action Completed
Record Date :	1/7/2009
First Name :	Doug
Last Name :	Lentz
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City :	Honolulu
State :	HI
Zip Code :	96850
Email :	Doug_Lentz@nps.gov
Telephone :	808-541-2693
Telephone Extension :	737
Add to Mailing List :	Both
Submission Method :	Website
Submission Content/Notes :	Hello, I am compiling the responses for the Draft EIS for the National Park Service. Please include me on your mailing list. I have a hard copy and disk copy. Are there any upcoming public meetings or meetings with those that need to be involved for consultation? Thank you for your time, Doug

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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

MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT10/09-337211

Mr. Doug Lentz
National Park Service
U.S. Department of the Interior
300 Ala Moana Boulevard, Room 6-226
P. O. Box 50165
Honolulu, Hawaii 96850

Dear Mr. Lentz:

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

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

Thank you for your interest in the project. The National Park Service has been notified of applicable consultation meetings.

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

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

United States Department of the Interior

NATIONAL PARK SERVICE
Pacific West Region
1111 Jackson Street, Suite 700
Oakland, California 94607-4807

IN REPLY REFER TO:

A3615 (PWR-PA)

JAN 0 6 2009

JAN 12 2009

Leslie Rogers
Regional Administrator
U S. Department of Transportation
Federal Transit Administration
201 Mission Street
Suite 1650
San Francisco, CA 94105-1839

Dear Mr. Rogers:

Thank you for your recent letter notifying the Department of the Interior, National Park Service (NPS) of the City and County of Honolulu's Department of Transportation Services (DTS) consultation for a proposed 20-mile elevated guideway transit system on Oahu and your invitation to participate in this consultation per 36 C.F.R. § 800.10(c). The National Park Service accepts the invitation and looks forward to working with you and your staff.

Your letter also seeks our determination about prospects for a de minimus finding for the impact of the Honolulu High-Capacity Transit Corridor Project on the Pearl Harbor National Historical Landmark District (NHL). The NPS supports the concept of a transit system with a primary or alternate route that includes a station with convenient access to the USS Arizona Memorial (included with the recently designated WWII Valor in the Pacific National Monument) and will participate in the planning process as applicable. However, the proposed de minimus finding seems premature and the NPS cannot, at this time, concur with a de minimus finding due to the reasons described below. NPS will participate in the ongoing consultation process and will provide our determination once an assessment of effect for the Pearl Harbor NHL District, the Bowfin NHL, and the Valor in the Pacific National Monument have been completed and once we have conferred with the State Historic Preservation Office. The NPS also will provide formal comments on the Draft Environmental Impact Statement (DEIS) by the February 6 deadline.

Proposed Transit System Construction within the Pearl Harbor NHL. The boundary of the NHL proceeds along the Pearl Harbor side of Kamehameha Highway from Aloha Stadium to the opposite side of Radford Drive. Three station entrances (stops) to the transit system are proposed within that distance: Aloha Stadium Station, Arizona Memorial Station, and Pearl Harbor Naval Base Station. The DEIS only discusses impacts associated with the Pearl Harbor Naval Base Station (Table 4-32, Historic Properties within Project's Area of Potential Effect). The DEIS should analyze the potential impacts of the other two proposed station entrances within the Pearl Harbor National Historic Landmark before a de minimus

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finding can be considered For example, there would be a major impact at the proposed USS Arizona Memorial Station proposed to be located on an existing NPS parking lot There is currently not enough parking at the site, so losing this parking space would have a major effect on NPS operations and visitation

Visual Impact. A 30-40 foot tall elevated guideway transit system along Kamehameha Highway could cause significant negative impacts to the Pearl Harbor NHL view shed The NPS recommends that a view shed analysis be completed for the proposed route before a de minimus finding can be considered. Potential Impacts to Soundscape The DEIS is not clear about the existing acoustic environment and what impacts to the soundscape of the Pearl Harbor NHL the proposed guideway rail system would generate A soundscape analysis should be completed to determine impacts to the Pearl Harbor and USS Bowfin NHL's and the USS Arizona Memorial before a de minimus finding can be considered Potential Vibration Effects The DEIS states that vibration levels should not exceed 65 VdB, which is below the 72 VdB allowed by the FTA around residential buildings. Analysis should be included for potential vibration effects on historic structures before a de minimus finding can be considered WWII Valor in the Pacific National Monument The DEIS does not analyze the potential impact to the newly designated monument

At this time, the NPS does not concur with a de minimus finding in regards to impacts of the Honolulu High-Capacity Transit Corridor Project on the Pearl Harbor NHL. The National Park Service looks forward to working with the conferees to develop the measures necessary to eliminate or mitigate adverse effects of the proposed transit project on the significant historic resources of the Pearl Harbor NHL District, the USS Bowfin NHL, and the WWII Valor in the Pacific National Monument

Sincerely,

Patricia L. Neubacher

for Jonathan B. Jarvis
Regional Director, Pacific West Region

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT10/09-338271

Mr. Jonathan B. Jarvis, Regional Director
National Park Service, Pacific West Region
U.S. Department of the Interior
1111 Jackson Street, Suite 700
Oakland, California 94607-4807

Dear Mr. Jarvis:

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

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

Based on concerns raised by Section 106 consulting parties, including the National Park Service, preliminary effect determinations described in the Honolulu High-Capacity Transit Corridor Historic Resources Technical Report (RTD 2008o) and the Draft EIS were reconsidered. An effects evaluation for all eligible resources was completed and the results are documented in the Honolulu High-Capacity Transit Corridor Historic Effects Report (RTD 2009d). This report was provided to the National Park Service for consultation under Section 106 of the National Historic Preservation Act (as amended). The State Historic Preservation Division (SHPD) has concurred with the 22 adverse effect determinations and recommended that an additional 11 resources were adversely affected. FTA accepted these

additional adverse effect determinations. The determinations of effect and the SHPD's concurrence are presented in Section 4.16 in this Final EIS.

The U.S. Naval Base Pearl Harbor National Historic Landmark (NHL) district and the CINCPACFLT Headquarters were determined to be in the Area of Potential Effects (APE) and identified as such in the Honolulu High-Capacity Transit Corridor Historic Resources Technical Report (RTD 2008o). Potential Project impacts to the Pearl Harbor NHL and historic properties associated with it and the CINCPACFLT Headquarters were reevaluated and addressed in the Honolulu High-Capacity Transit Corridor Historic Effects Report (RTD 2009d). This portion of the report is preceded by a special section explaining the methodology used to evaluate these resources. Although the Historic Effects Report concluded that there was no adverse effect to these NHLs, the SHPD did not concur and FTA agreed to accept the SHPD's recommendation. Ossipoff's Aloha Chapel was also determined to be adversely affected by the Project. The NHLs USS Arizona, USS Utah, and USS Bowfin are not within the APE and, therefore, are not part of the Historic Effects Report.

The City refined the Project design to avoid and minimize impacts to the NHL and, therefore, there are no direct impacts from the Project and there is no need for the NPS to concur on de minimis impacts within the NHL. Chapter 5 of the Final EIS includes the Section 4(f) evaluation.

Impacts resulting from the Arizona Memorial Station were not reevaluated in the Historic Effects Report since this station was part of the Airport & Salt Lake Alternative in the Draft EIS. This station is not part of the Project as defined in this Final EIS and, therefore, will not cause any effects to resources.

Based on the National Park Service's comment, additional viewshed analysis was conducted for the Project. Section 4.8, Visual and Aesthetic Conditions, in this Final EIS includes this viewshed analysis with two visual simulations that demonstrate that the Project would have a low visual effect on the Pearl Harbor National Historic Landmark and the portion of the World War II Valor in the Pacific National Monument that is contained within Pearl Harbor's boundaries.

Based on the National Park Service's comment, additional noise analysis was completed to determine the impacts of the Project on the Pearl Harbor National Historic Landmark acoustic environment. After consultation with the National Park Service regarding sampling locations, noise measurements and analyses were completed at three additional locations. Using FTA guidelines, no noise impacts were found (see Section 4.10.3 for figure identifying the noise measurement locations and results (Aloha Stadium to Kalihi), in the Final EIS). Vibration effects from the Project were determined using the detailed vibration assessment information and procedures contained in the FTA's Transit Noise and Vibration Impact Assessment (FTA 2006a). FTA reference data on ground transmission of vibration energy were used to estimate vibration levels. Based on this analysis, there is no long-term vibration impact to historic resources. Vibration impacts and mitigation are discussed in Section 4.18.5 of the Final EIS and in the Programmatic Agreement for the Project (Appendix H of the Final EIS).

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

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

United States Department of the Interior

NATIONAL PARK SERVICE
Pacific West Region
1111 Jackson Street, Suite 700
Oakland, California 94607-4807

IN REPLY REFER TO:

A3615 (PWR-PA)

FEB 06 2009

FEB 10 2009

Wayne Y. Yoshida
Director, Department of Transportation Services
City and County of Honolulu
650 South King Street, 3rd Floor
Honolulu, Hawaii 96813

Dear Mr. Yoshida:

Thank you for your letter and Draft Environmental Impact Statement (EIS) to review regarding the City and County of Honolulu's Department of Transportation Services (DTS) proposed Honolulu High-Capacity Transit Corridor Project.

The National Park Service (NPS) supports the concept of a transit system with a primary or alternate route that includes a station with convenient access to Valor in the Pacific National Monument (formerly known as the USS Arizona Memorial) but has some significant concerns and comments. Please see the enclosure for a complete list of NPS comments. The National Park Service looks forward to working with the U. S. Department of Transportation on this important project. If you have any questions please contact Frank Hays at 808-541-2693 extension 723 or email him at Frank_Hays@nps.gov.

Sincerely,

Jonathan B. Jarvis
Regional Director, Pacific West Region

Enclosure

cc:
Ted Matley, Federal Transit Administration, Region IX
Frank Hays, Pacific West Region, Honolulu
Patty Neubacher, Pacific West Region

TAKE PRIDE IN AMERICA

REVIEW COMMENTS

DATE: 2/4/09

AGENCY: National Park Service (NPS)

PROJECT: Honolulu High-Capacity Transit Corridor

REVIEWERS: Doug Lentz, Paul DePrey, Frank Hays, Elaine Jackson-Retondo, Melia Lane-Kamahele, Alan Schmierer

No.	Page	Topic	Comment
1.	5-6 thru 5-9	Table 5-2, Historic Properties	Consideration/analysis of the impact to the newly established World War II Valor in the Pacific National Monument (NM), Pearl Harbor (NHL), USS Arizona Memorial (NHL), and USS Bowfin (NHL) is absent throughout this DEIS. Analysis of these resources needs to be incorporated. These resources should also be identified on a map that shows their boundaries and proximity to the elevated transit system.
2.	S-8	Archaeological, Cultural, and Historic Resources, paragraph 5 and 6.	It states that up to 61 historic resources for the project could be affected (moved/damaged/destroyed). "Appropriate mitigation measures are discussed in the following Construction Effects section." Mitigation measures are not discussed in the Construction Effects section.
3.	S-9	Cost and Financial Analysis	The Pearl Harbor Historic Sites (USS Bowfin Submarine Museum and Park, Pacific Aviation Museum, Battleship Missouri Memorial, and World War II Valor in the Pacific National Monument, formally USS Arizona Memorial) receive over 1.5 million visitors a year, one of the most visited destinations in the Pacific. All visitors access the Pearl Harbor Historic Sites through World War II Valor in the Pacific National Monument. The National Park Service (NPS) supports either an alternative that includes the Airport Alternative with a stop in reasonable proximity to the NM or a public transportation option that transports visitors from the Salt Lake Alternative (Salt Lake Station) to the NM.
4.	2-19	Airport Alternative	This alternative states "Stations would be constructed at Aloha Stadium, Pearl Harbor Naval Base, Honolulu International Airport, and Lagoon Drive." However, all maps that pertain to this area, and other locations in the DEIS, identify a station at the NM, formally USS Arizona Memorial . See comment 3.

AR00000893

5.	3-29	Figure 3-10	If both the Salt Lake and Airport alternatives are implemented consider consolidating the two Aloha Stadium stations.
6.	3-44	3.4.5. Mitigation of Long-term Transportation Effects Traffic	The NPS is concerned about commuter parking at the NM station. There is currently not enough parking for visitors to the NM. Please include the Pearl Harbor Historic Sites (Pacific Aviation Museum, USS Bowfin Submarine Museum and Park, Battleship Missouri Memorial, and World War II Valor in the Pacific National Monument) in discussions about the NM station location.
7.	3-45 3-48	3.5 Construction-related Effects on Transportation Table 3-26 3.5.7 Mitigation of Construction-related Effects	There is only one road from King Kamehameha Highway that accesses the Pearl Harbor Historic Sites, Arizona Memorial Place. The DEIS does not address this cross street in the narrative or on table 3-26. The Maintenance of Traffic Plan needs to plan for the traffic issues at this intersection prior to construction. The Pearl Harbor Historic Sites are a destination for over 4,000 visitors a day. Please work with the Pearl Harbor Historic Sites to plan for vehicular access for employees and visitors.
8.	4-31	Figure 4-11 Community Resources and Facilities within One-half Mile, Aloha Stadium to Kalihi	Identify World War II Valor in the Pacific National Monument, formally USS Arizona Memorial, and USS Bowfin Submarine Museum and Park as parks or recreation facilities within one-half mile of the transit system.
9.	4-36	Table 4-7 (property acquisition)	The Pearl Harbor Historic Sites are not listed in the table of community facilities and services that will be affected.

AR00000894

	4-36	and Airport Alternative	The DEIS proposes a station at World War II Valor in the Pacific National Monument, formally USS Arizona Memorial. The NPS has concerns with a station at this proposed location. Please include the Pearl Harbor Historic Sites (Pacific Aviation Museum, USS Bowfin Submarine Museum and Park, Battleship Missouri Memorial, and World War II Valor in the Pacific National Monument) in discussions about the NM station location.
10	4-37	Parklands and Recreation Facilities	The DEIS does not acknowledge, or address the effects of, acquisition of property at the NM but it does show the footprint of a station on the commercial parking lot. There will be a major effect on World War II Valor in the Pacific National Monument if a station is located on half of the commercial bus parking lot. This will need further discussion and involvement with the NPS.
11	4-40 4-41	Affected Environment Neighborhoods Aiea	This section looks at neighborhoods adjacent to the project and the anticipated effects. The Pearl Harbor Historic Sites attract over 1.5 million visitors to Pearl Harbor every year and are located in the Aiea neighborhood but are not considered in the DEIS.
12	4-59	Visually Sensitive Resources Kalihi to Ala Moana Center Landscape Unit	The DEIS identifies "Pearl Harbor (East Loch)" in the wrong section. Pearl Harbor is located in the two prior sections, Aloha Stadium to Kalihi and Fort Weaver Road to Aloha Stadium.
13	4-65 to 84	Viewpoints	The before and after pictures are extremely helpful. A before and after viewshed analysis from the USS Arizona Memorial, the USS Bowfin and from other Ford Island sites looking toward the proposed railway (mauka) should be completed. Consult with NPS and US Navy historians to identify and take actions to preserve or mitigate impacts to historic viewsheds.

AR00000895

14	4-100	4.9.3 Environmental Consequences and Mitigation	Include the noise model that was used to project noise levels. It should include the noise level 100 yards away from the raised rail line. No noise projections or estimates were done between Aloha Stadium and Hickam Air Force Base and need to be. Noise projections range up to 75 dBA. That is too loud for quiet contemplation or interpretive talks.
15	4-108	4.10.2 Electric and Magnetic Fields	The maintenance facility at the NM is within the 200 feet of the transit rail line and has not been evaluated for electric and magnetic concerns.
16	4-125	4.12.3 Environmental Consequences and Mitigation	All night lighting should be down lighting to reduce light pollution of night skies and to protect an endangered bird species.
17	4-142	4.15.1 Section 106	The NPS should be on this list to review.
18	4-168	4.18.2 Indirect Effects Airport Alternative	In the DEIS the Arizona Memorial Station and Aloha Stadium Station were left out of this section, both of which are within the Pearl Harbor NHL. Therefore, there are three stations within the NHL and the cumulative impact of that should be evaluated.
19	4-169	4.18.3 Cumulative Effects	See comment 18.
20	5-2,3	De Minimis Impacts	At this time, the NPS does not concur with a *de minimis* finding in regards to impacts of the project on the Pearl Harbor, USS Arizona Memorial, and USS Bowfin NHLs.
21	5-4	Table 5-1 Publicly Owned Parks and Rec. Areas Adjacent to Project Alignment	The World War II Valor in the Pacific National Monument, formerly USS Arizona Memorial, is publicly owned and adjacent and should be included here.
22	5-5	5.4 Direct Use of Section 4(f) Properties 5.4.1 Park and Rec. Resources	Please include the Pearl Harbor Historic Sites (Pacific Aviation Museum, USS Bowfin Submarine Museum and Park, Battleship Missouri Memorial, and World War II Valor in the Pacific National Monument, formally USS Arizona Memorial) in discussions about the NM station location
23	5-34	5.5.2 Parks and Rec. Resources	The NM should fall into Section 4(f) consideration.

AR00000896

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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June 11, 2010

RT10/09-338279R

Mr. Jonathan B. Jarvis
National Park Service, Pacific West Region
U.S. Department of the Interior
1111 Jackson Street, Suite 700
Oakland, California 94607-4807

Dear Mr. Jarvis:

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

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NPS Comment 1

Potential Project impacts to the CINCPACFLT Headquarters and Pearl Harbor National Historic Landmark and historic properties associated with it were evaluated and addressed in the Historic Effects Report: Honolulu High-Capacity Transit Corridor Project (RTD 2009d). This report contains information, including mapping, detailing the methodology used to evaluate these resources. Although the Project team determined that there were no adverse effects to the NHL, the State Historic Preservation Division (SHPD) did not concur with these evaluations. FTA agreed to accept these adverse effect determinations. Final determinations of effect are documented in this Final EIS, Section 4.16. A figure illustrating the location of these resources

has been added to the Final EIS Section 4.16. Effects to the World War II Valor in the Pacific National Monument were also considered, although this resource type is not specifically provided for under Section 106. Please note that the USS Arizona Memorial and the USS Bowfin are not within the Area of Potential Effects for this project. Section 4.5 of the Final EIS identifies community resources and facilities within one-half mile of the Project. This figure has been revised in this Final EIS to include World War II Valor in the Pacific National Monument.

NPS Comment 2

The discussion of construction effects on Archaeological, Cultural, and Historic Resources is included in Section 4.18.11, Archaeological, Cultural, and Historic Resources, in this Final EIS, and includes discussion of mitigation measures, including sampling, monitoring, and where appropriate, preservation of such resources. The Programmatic Agreement (Appendix H of the Final EIS) identifies measures will be employed to mitigate potential impacts to archaeological resources and all work will follow applicable state laws. The effects to historic resources were re-evaluated after the publication of the Draft EIS. The effect determinations are presented in Section 4.16.3 of the Final EIS. Thirty-three historic resources will be adversely affected by the Project. Any potential construction impacts to historic properties will be mitigated using measures outlined in previous construction sections related to noise, vibration, air quality, and water quality.

NPS Comment 3

The National Park Service's support for an alternative that is in reasonable proximity to the National Monument (NM) is noted. The Preferred Alternative as presented in the Final EIS includes a station at Aloha Stadium. Visitors can walk or transfer to a bus to visit the NM.

NPS Comment 4

As indicated in Figure 2-7 of the Draft EIS, the Arizona Memorial Station would have been constructed only for the Airport & Salt Lake Alternative. The City has identified the Airport Alternative as the preferred alternative.

NPS Comment 5

As indicated in Figure 2-7 of the Draft EIS, each alternative would have had a different station location or combination of station locations in the vicinity of Aloha Stadium. The City has selected the Airport Alternative as the preferred alternative. This alternative includes one station at Kamehameha Highway at Salt Lake Boulevard.

NPS Comment 6

There is no longer a station planned near the Arizona Memorial. The closest station will be almost a half-mile away at Aloha Stadium. Parking would be provided for commuters at Aloha Stadium Station, and therefore, it is not expected that commuters would park at the Arizona Memorial to use the Project.

NPS Comment 7

Table 3-27 in this Final EIS presents information on lane closures during construction of the fixed guideway system. Under the Airport Alternative, one lane will be closed in the Koko Head-bound direction on Kamehameha Highway from Salt Lake Boulevard to Center Drive. Arizona Memorial Place is within this segment. This is expected to have temporary traffic impacts on Kamehameha Highway during construction.

NPS Comment 7

As discussed in Section 3.5.7, Mitigation of Construction-related Effects, in this Final EIS a Maintenance of Traffic (MOT) Plan will be developed by the contractor prior to construction, and will describe road closures and delays. Maintaining traffic flow and access are the primary objectives of these plans. As stated in this Final EIS, "During final design...detailed Work Zone Traffic Control plans, including detour plans, would be formulated in cooperation with the City, HDOT, and other affected jurisdictions." Coordination with the Pearl Harbor Historic Sites will occur and access to the Memorial will be maintained throughout the construction period to minimize disruption.

As stated in Section 8.7, Continuing Public Involvement through Construction, in this Final EIS, several public involvement strategies will be utilized to inform businesses and the general public (and, in this case, the NPS and Memorial staff) about construction activities, including roadway detours and temporary arrangements to accommodate construction activities. These strategies include: a public involvement plan developed prior to construction to inform business owners of the construction schedule and activities, public information campaigns to inform people that businesses and other visitor destinations are open during construction and to encourage their continued patronage, and public information regarding construction activities and ongoing activities provided in print and on television and radio.

NPS Comment 8

Section 4.5 of the Final EIS identifies community resources and facilities within one-half mile of the Project. This figure has been revised in this Final EIS to include World War II Valor in the Pacific National Monument.

NPS Comment 9

The Project will not acquire land from the Pearl Harbor Sites and therefore, it is not listed in Section 4.5.3 as a community facility that will be affected by the Project. As indicated in Figure 2-7 of the Draft EIS, the Arizona Memorial Station would have been constructed only for the Airport & Salt Lake Alternative. The City has selected the Airport Alternative as the preferred alternative.

NPS Comment 10

The preferred alternative for the project is the Airport Alternative only, which extends from East Kapolei to Ala Moana Center. The Arizona Memorial Station referred to would only be constructed if the combined Airport and Salt Lake Alternative were selected. The Airport

Alternative, the Salt Lake Alternative and the Airport & Salt Lake Alternative were carried forward in the Draft EIS, and none was identified as the preferred alternative at that time. The City has since identified the Airport Alternative as the preferred alternative. This selection was based on consideration of the benefits of each alternative, public input on the Draft EIS, and City Council Resolution 80-261 identifying the Airport Alternative. Therefore, the Arizona Memorial Station will not be constructed, and no land acquisition would occur within the commercial bus parking lot of Aloha Stadium.

NPS Comment 11

Section 4.5, Community Services and Facilities of the Final EIS, including parklands and recreational facilities, has been revised to include the Pearl Harbor Historic Sites are adjacent to the Project and acknowledges the 1.5 million visitors a year.

NPS Comment 12

The reference to "Pearl Harbor (East Loch) in the discussion of the Kalihi to Ala Moana Center Landscape Unit, has been deleted in this Final EIS.

NPS Comment 13

After consultation with NPS, two additional visual simulations were prepared and views from the NM were analyzed. The viewshed analysis of the World War II Valor in the Pacific National Monument at Pearl Harbor has been prepared and added to Section 4.8 in this Final EIS. The viewshed analysis in the Final EIS includes two additional viewpoints: visual simulation from the Arizona Memorial looking mauka and visual simulation from the World War II Valor in the Pacific National Monument Visitor Center parking lot looking mauka. The analysis showed that the Project would not affect the NHL's visual integrity and will hardly be visible on mauka views from the Harbor. The Project elements will be dominant visual elements along the mauka edge of the NHL Visitor Center parking lot."

NPS Comment 14

As stated in Section 4.10.1 of the Final EIS, noise measurements were taken at 46 noise sensitive location along the study corridor. Eight of the noise measurements were taken at sites near the Arizona Memorial and Pearl Harbor Naval Base in response to comments on the Draft EIS.

Noise analysis was completed at the Arizona Memorial Remembrance Circle, parking lot, and boat dock. The results are included in Section 4.10.3 of the Final EIS and in the Noise Technical Report Addendum. There will be no noise impact at these locations as a result of the Project.

The project design includes an integrated noise-blocking parapet wall at the edge of the guideway structure that extends three feet above the top of the rail. The parapet wall will substantially reduce ground-level noise.

NPS Comment 15

The Honolulu High-Capacity Transit Corridor Electric and Magnetic Fields Technical Report (RTD 2008h) indicates: "3.1 Field Survey of Potentially Affected Facilities Sensitive land uses that may be affected by changes to the Earth's geomagnetic field from operation of the Project could include research, manufacturing, medical, and possibly military facilities that use tools that depend on the stability of the Earth's field. These tools can include, but may not be limited to, electron microscopes, nuclear magnetic resonance spectrometers, and magnetic resonance imaging (MRI) equipment used for medical diagnostic purposes.

Verification of land uses in the study area was necessary because the City and County of Honolulu (City) does not have a designated land use map in its General Plan. Therefore, the following steps were taken to establish existing conditions:

1. *Prior to conducting field verification, the following land uses were mapped according to readily available data: high-voltage power lines, medical and diagnostic facilities, institutional and research facilities, and military operations.*

2. *The maintenance facility at the National Monument to which you refer to does not meet "the tools that depend on the stability of the Earth's field" methodology and will not be effected.*

NPS Comment 16

In Section 4.8.3 of this Final EIS, the following design criteria will be implemented in Final Design as mitigation measures to minimize lighting effects:

- *The quality of the lighting design will greatly influence the appearance and attractiveness of stations and will play an important role in enabling the public's acceptance of the system and the stations.*

- *Glare from transit station lights or reflective surfaces will be reduced to an absolute minimum such that it does not affect the vision of motorists.*

- *Light spill will be prevented from the stations onto roadways and areas adjacent to stations and station sites.*

- *Brightness and glare will be reduced to an absolute minimum by:*

    - *Locating light sources to avoid direct reflection or by selecting anti-reflective finishes.*

    - *Minimizing or eliminating undesirable reflections in glazed and polished surfaces, glass, walls and other similar elements.*

    - *Minimizing or eliminating light spillage onto adjacent properties and eliminating night sky pollution. This will be done using full cut-off luminaries (fixture and lamp design) and low-reflective surfaces.*

- *Light sources in parking structures will not be visible from outside the structure, particularly those on the upper decks.*

NPS Comment 17

The National Park Service has been added to the list of agencies and groups in Section 4.16.1, Background and Methodology, in this Final EIS that have participated as consulting parties as part of the Section 106 process.

NPS Comment 18

The Airport Alternative has been identified as the preferred alternative, and therefore, the Arizona Memorial Station is no longer being considered. The environmental effects related to the Aloha Stadium Station are discussed in Section 4.19.2, Indirect Effects, in this Final EIS. These two stations differ from the other project stations. Both are fairly remote from other developments and not likely to have any indirect transit-oriented development (TOD) effects. The primary land use near the Aloha Stadium is the Stadium and Pearl Harbor Navy facilities, neither of which is likely to be redeveloped before 2030.

NPS Comment 19

The cumulative impact analysis as presented in Section 4.19.3 of the Final EIS has been expanded since the Draft EIS and discusses the cumulative effects of the Project and describes the past, present, and reasonably foreseeable actions in the study corridor. The environmental effects related to the Aloha Stadium Station are discussed in this section as part of the overall Project analysis.

NPS Comment 20

FTA has accepted SHPD's recommendation that the Project will have an adverse effect to the Pearl Harbor NHL. In addition, there will be no direct use of land by the Project in U.S. Naval Base Pearl Harbor HNL, USS Arizona Memorial, and USS Bowfin National Historic Landmarks. Therefore, a de minimis approach is no longer applicable.

NPS Comment 21

The World War II Valor in the Pacific National Monument, identified as the United States Naval Base Pearl Harbor NHL, has been added to Table 5-2, Historic Resources Evaluated for Section 4(f) Use, in this Final EIS.

NPS Comment 22

Section 5.5.2, Historic Sites, in this Final EIS has been revised to identify that there will be no use of the Pacific Aviation Museum, USS Bowfin Submarine Museum and Park, Battleship Missouri Memorial, and USS Arizona Memorial.

NPS Comment 23

The National Monument has been added Section 5.5.2, Historic Sites, in this Final EIS.

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

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

DEPARTMENT OF THE NAVY
COMMANDER
NAVY REGION HAWAII
850 TICONDEROGA ST STE 110
PEARL HARBOR HI 96860-5101

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CERTIFIED MAIL NO. 7003 1680 0000 7269 2083

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

Dear Mr. Yoshioka:

We recently received a copy of your Historic Resources Technical Report for the Honolulu High-Capacity Transit Corridor Project. We are concerned that the City and County of Honolulu (CCH) has conducted assessments of Navy properties and evaluated said properties for National Register eligibility without Navy input. Accordingly, several of the eligibility determinations listed in the Transit Corridor report conflict with determinations upon which Navy previously received State Historic Preservation Office (SHPO) concurrence. These include both sites and structures on Navy owned property at the former Naval Air Station Barbers Point. We maintain that Navy's National Register for Historic Places (NRHP) eligibility determinations remain valid and that CCH may not revise these determinations on Navy's behalf.

Navy consulted with the SHPO during development of the 1999 Barbers Point Base Realignment and Closure (BRAC) Environmental Impact Statement (EIS) and during the 2002 Ford Island Master Development (FIMD) Programmatic EIS. Through these processes, Navy received concurrence on all Barbers Point NRHP eligibility determinations as documented in these EISs. Surveys conducted during the 1990s including our 1997 Phase I Cultural Resources Survey and Inventory Summary, cultural resource surveys leading up to the 1997 survey, and the Navy's 1999 Cultural Resources Management Plan formed the foundation for these consultations.

As we recently conveyed 499 acres at Barbers Point pursuant to congressional mandate, we are especially interested in the following structures on the 499 acres:

- Quonset huts 1144, 1149, 1150, 1152, 1153, 1562, and 1570
- Facilities 5, 77, 128, 476, 477, and 484

With respect to the Quonset huts, Navy determined these Quonset Huts as "not eligible" for listing on the NRHP. Navy operates under a nationwide Programmatic Memorandum of Agreement (PMOA) for World War

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II Temporary Buildings. The Advisory Council for Historic Preservation (ACHP) and the National Council of State Historic Preservation Officers (NCSHPO) established conditions and stipulations under which the temporary building demolition program would be carried out for the Department of Defense. The Navy, SHPO, ACHP, National Trust for Historic Preservation, Historic Hawaii Foundation, and the Oahu Council of Hawaiian Civic Clubs subsequently signed a 2003 *Programmatic Agreement Regarding Navy Undertakings in Hawaii* which recognizes the World War II Temporary Buildings PMOA and addresses treatment of these Quonset huts. Specifically, the parties to the 2003 PA will be notified of any adverse action to be taken with respect to these structures, and the Navy agrees to engage in discussions to explore preservation options for these structures.

Navy surveys determined facilities 5, 77, 128, 476, and 477 as "not eligible" for NRHP listing. Navy also considers facility 484 as "not eligible" for NRHP listing because of its association with facility 128 (radio transmitter facility). Navy is unaware of any new information that has surfaced since we received SHPO concurrence on our site evaluations. Only Building 77, which was constructed in 1958, has become 50 years old since our surveys were conducted. Despite its age, Building 77 was originally included in our 1997 survey as part of the Cold War Building Inventory (Appendix B.II in Tuggle and Tomanari-Tuggle 1997 Part I) and was determined ineligible for listing on the NRHP.

We request that you revise your report to reflect Navy's eligibility determinations for the above-listed structures. We plan to review your Historic Resources Technical Report in more detail with respect to all Navy property at the former NAS Barbers Point, and we look forward to receiving your reply related to the 499 acres. We also intend to send separate correspondence on the proposed corridor alternatives as they relate to Navy property and operations. Please contact Mr. John Muraoka, (808) 471-4137 extension 239, if you require additional information related to historic resources.

Sincerely,

B. J. MUILENBURG
Captain, CEC, U.S. Navy
Regional Engineer
By direction of the
Commander

AR00000905

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT11/08-288794R

B.J. Muilenburg, Commander
Department of the Navy, Navy Region Hawaii
850 Ticonderoga Street, Suite 110
Pearl Harbor, Hawaii 96860-5101

Dear Commander Muilenburg:

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

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

The Navy's eligibility determinations remain valid. The properties in question, including the 499 acres at Barbers Point, are outside the boundaries of the Project covered in the Draft EIS, and the FTA makes no eligibility determinations for them. No eligibility determinations for the properties in question were submitted the State Historic Preservation Division (SHPD) for concurrence, and SHPD's concurrence letter does not discuss these properties. Section 106 consultation letters are presented in Appendix G, Record of Public and Stakeholder Correspondence and Coordination, of this Final EIS.

Section 106 consultation did not include eligibility determinations for the properties in question. Neither the eligibility determinations in the Honolulu High-Capacity Transit Corridor Project Historic Resources Technical Report (RTD 2008o) nor the Historic Effects Report

(April 2009) include the properties in question. These reports are available from the Department of Transportation Services and on the project website (www.honolulutransit.org).

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

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

DEPARTMENT OF THE NAVY
COMMANDING OFFICER
NAVAL STATION
850 TICONDEROGA ST STE 100
PEARL HARBOR HI 96860-5102

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17 Dec 08

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

SUBJ: NAVY HONOLULU HIGH-CAPACITY TRANSIT CORRIDOR PROJECT PARTICIPATING AGENCY PROJECT UPDATE

Dear Mr. Yoshioka:

Thank you for the opportunity to participate in the review process for this endeavor, and for the project updates, draft Environmental Impact Statement, and preliminary discussions of inter-agency agreement provided by your staff to the Navy on November 14 and 18, 2008.

In a separate letter dated November 12, 2008, the Navy raised concerns that the Historic Resources Technical Report for the Honolulu High-Capacity Transit Corridor (HHCTC) Project evaluated Navy property for National Register eligibility without Navy input. This letter provides additional information in response to your letter dated August 18, 2008 requesting Navy's written comments on the project.

The Salt Lake Alignment poses fewer concerns but also offers fewer benefits to the Navy compared to the Airport Alignment. The Navy previously indicated support for the Airport Alignment due to benefits for the Pearl Harbor Navy workforce, family housing areas and historic visitor destinations at Halawa Landing. In either case, careful collaboration to ensure a satisfactory outcome for all parties is needed. Navy's concerns relate to security, noise and traffic impacts (both during and after construction), appearance and the need for adequate transportation spokes between the closest HHCTC station and major Pearl Harbor area work centers, including Pearl Harbor Naval Shipyard which is the largest industrial employer in Hawaii. The enclosed document discusses these concerns in greater detail.

As mandated by the 2005 Base Realignment and Closure legislation, Hickam Air Force Base and Naval Station Pearl Harbor will join to form Joint Base Pearl Harbor Hickam in 2010. As Navy is the lead service for the Joint Base, for planning purposes the issues discussed in the enclosure can be expected to apply to Hickam AFB and related housing areas.

Should you have any questions, please contact my Public Works Officer, CDR Lore Aguayo, at 471-2647 or email maria.aguayo@navy.mil

Warm regards,

R. W. KITCHENS
Captain, U. S. Navy
Commanding Officer
Naval Station Pearl Harbor

Enclosure:
(1) U. S. Navy Initial Comments for the Honolulu High-Capacity Transit Corridor Project, dtd 24 NOV 08

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November 24, 2008

U.S. NAVY INITIAL COMMENTS FOR THE HONOLULU HIGH-CAPACITY TRANSIT CORRIDOR PROJECT

1. Impacts to Security and Operations

This issue was discussed in the security meeting of July 16, 2008 attended by both U.S. Navy and DTS key players. The Navy cites potential security issues regarding the Airport Alternative as it runs adjacent to Navy property. The location of the Pearl Harbor Station (#32) raises security concerns due to its proximity to the Makalapa Entry Control Point and other high occupancy or critical Navy facilities such as barracks, medical facilities and administration buildings. The location, elevation and design of all stations should incorporate measures to protect Navy property and prevent increased visibility of and access to Navy assets and operations. The Navy is also concerned about potential increases in traffic along Kamehameha Highway at the Pearl Harbor Station and congestion around drop-off zones for this station. Security concerns along the Salt Lake Alternative are noted below under Item 3. Impacts to Navy Housing.

2. Navy Real Property Encroachments

City use of Navy land requires issuance of appropriate real estate documents prior to use of the property. Please provide information on all Navy lands required by the City for the transit project to this office for Navy review. A formal request must be submitted to Navy Region Hawaii for such use at least nine months in advance to enable the processing of the request. Based on the information provided thus far, impacts to Navy property were noted at the locations listed below. In addition, it is our understanding that the project may also encroach upon Navy property along other parts of the transit route outside of the Pearl Harbor main base area.

Salt Lake Alternative
- a. #20, near Lawehana Street
- b. #21, near Radford Drive
- c. #22, near Peltier Avenue

Airport Alternative
- a. Aloha Stadium Station
- b. Arizona Memorial Station
- c. Pearl Harbor Station
- d. Ohana Nui Area

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CITY & COUNTY OF HONOLULU
TRANSPORTATION SERVICES

3. Impacts to Navy Housing

Navy housing is currently managed and controlled by Ohana Military Communities, LLC. Any necessary adjustments to property boundaries or real property encroachments

should be addressed through formal agreements between City and County and the Navy as discussed above.

In addition, the Navy is concerned about possible visual impacts of an elevated track system, increases in ambient noise levels in adjacent housing areas, and traffic congestion generated by transit stations. In particular, the Navy is concerned about the location of the Ala Lilikoi Station, the potential increase in vehicular traffic on Camp Catlin Drive and the impacts to surrounding housing areas and pedestrian safety. Camp Catlin Drive traverses through three residential areas. When fully developed, Camp Catlin will have 318 homes, Doris Miller Park will have 214 homes and Halsey Terrace will have 477 homes. Although Camp Catlin Drive is primarily a residential secondary street servicing local traffic needs, construction of a light rail station at the north end of Camp Catlin/Arizona Road will likely result in Camp Catlin Drive becoming a primary thoroughfare.

Camp Catlin Drive is a federally-owned road that is an integral part of a security plan negotiated between Ohana Military Communities, LLC and the Department of the Navy. Substantial increases in traffic on Camp Catlin Drive may adversely impact implementation of the security plan and jeopardize the security of the housing residents. Camp Catlin Drive is also a major pedestrian route used by students in the housing area to walk to Aliamanu Elementary and Intermediate Schools. Current vehicular traffic is heavy enough to warrant the provision of a security guard to assist pedestrians across the street. The Navy requests that the City implement appropriate mitigation measures for affected streets and surrounding areas and consider accepting fee title to this roadway.

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DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT12/08-292736R

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

Dear Commander Kitchens:

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

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

1. Security and Operations

DTS is coordinating with the Navy regarding base security concerns. Section 2.5.4 of the Final EIS provides an overview of Safety and Security features of the Project. Specific security concerns have been addressed with the Navy through inter-governmental coordination. Project threat assessment staff have met with Navy staff to evaluate issues of concern and provide appropriate security mitigation through project design.

As mentioned in Final EIS section 3.4.3, traffic volumes along major roadways will decrease with the Project, compared to the No Build alternative. For example, the traffic model found decreases in traffic of 11 percent at the Kalauao screenline and the Salt Lake screenline, in the Koko Head direction. At the Pearl Harbor Naval Base Station, increased activity could occur due to transfers between buses and trains, passengers being dropped off or picked up,

and pedestrians crossing the street to reach the station or nearby destinations such as the Navy Base. The traffic analysis found no significant effect from the Project at this location.

2. Navy Real Property

DTS continues to coordinate with the Navy regarding project right-of-way requirements and its impacts. The Navy has been provided a map of areas required for the Project. Coordination with the Navy for use of Navy lands is ongoing. Current information regarding station design and right-of-way needs was presented to the Navy on June 12, 2009.

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

The Alternatives Analysis phase, which preceded the EIS process, is documented in Chapter 2 of the Final EIS. It evaluated a range of modal and general alignment alternatives, in terms of their costs, benefits, and impacts. The scoping process for the Alternatives Analysis involved a presentation of the viable alternatives to the public and interested public agencies and officials to receive comments on the Purpose and Need, alternatives, and scope of the analysis. Scoping for the EIS followed the FTA process that provides for a culling of alternatives studied in the EIS through an Alternatives Analysis. The scoping process initiated for the Alternatives Analysis included a variety of highway, bus and fixed guideway options for consideration. During the later scoping effort for the EIS, the public was requested to propose alternatives that would satisfy the purpose and need at less cost or with greater effectiveness, less environmental or community impact and to propose alternatives that were not previously studied and eliminated for good cause. The only alternative that emerged that met these criteria was a fixed-guideway alternative following several alternative alignments. All reasonable alternatives that emerged from these processes were ultimately evaluated in the Draft and Final EISs.

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

3. Impacts to Navy Housing

DTS has coordinated with the Navy regarding project right-of-way requirements. As shown in Figure 4-25 of the Final EIS, the Project will be visible to some residential areas.

In response to concerns expressed by the Department of the Navy, the Final EIS, Section 4.10.3, contains additional noise analysis of Navy housing areas. As shown on Figure 4-55, the noise monitoring was conducted at Betio Place, Makalapa Guest House, Makalapa Drive, Community Center, and MWR Youth Field for the Final EIS. Moderate noise impacts were predicted to occur at Makalapa Guest House and Belto Place; however, wheel skirts on transit vehicles will be included as noise mitigation in project design. As a result, with mitigation, the Project will cause no noise impacts in this area.

With the selection of the Airport Alternative, there would not be an Ala Lilikoi Station; therefore, substantial traffic effects on Camp Catlin Drive are not expected.

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

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

DEPARTMENT OF THE NAVY
COMMANDING OFFICER
NAVAL STATION
850 TICONDEROGA ST STE 100
PEARL HARBOR HI 96860-5102

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05 FEB 2009

CERTIFIED MAIL NO. 7007 3020 0002 3044 3834

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

Dear Mr. Yoshioka:

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

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

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

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

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

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

Sincerely,

R. W. KITCHENS

Enclosures (2)

Copy to:
COMNAVREG HI (N3, N4, N9)
FISC PH (Code 700)
HICKAM AFB (15 CES/CEV - R. Lanier)
NAVFAC HI (ARE1, EV, OPHAM, OPHAM1GW, PRP)
PACFLT (N01CE)
PHNSY&IMF (Code 900 - D. Webber)

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

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

General Comments / Concerns:

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

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

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

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

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

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

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

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

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

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

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

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

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

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

AR00000919

Specific Comments:

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

2) Section 4.11 Hazardous Waste and Materials:

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

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

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

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

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

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

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

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

h) Additional IR Site information:

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

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

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

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

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

AR00000921

coordination during the planning and design phases of each undertaking.

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

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

AR00000922

LEGEND:
MONITORING WELL LOCATION FROM REMEDIAL INVESTIGATION (EARTH TECH, 2003)
NEW MONITORING WELL LOCATION
LOCATION OF ACTIVE 8-INCH OIL PIPELINE
SEGMENT OF INACTIVE NAVY 16-INCH FUEL OIL AND 8-INCH DIESEL OIL PIPELINES
HALAWA LANDING COMMERCIAL LEASE AREA BOUNDARY
NAVFAC PACIFIC
Shaw Environmental, Inc.
SITE LOCATION MAP
HALAWA LANDING
PEARL HARBOR NAVAL COMPLEX
OAHU, HAWAII
837626
FIGURE 2
AS SHOWN
SCALE (feet)
Approximate area of known petroleum contamination. Delineation required to the north/west.
APPROXIMATE LOCATION OF ACCESS PIT 5
KAMEHAMEHA HIGHWAY
ADMIRAL BERNARD CLAREY BRIDGE
PEARL HARBOR
U.S.S. BOWFIN SUBMARINE MUSEUM
HALAWA STREAM
EXISTING FOOT BRIDGE
PARKING
BUS PARKING

ENCLOSURE(2)

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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

MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT2/09-299171R

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

Dear Commander Kitchens:

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

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

Cover Letter

The Navy has been provided a map of areas required for the Project. Property for the Pearl Harbor Station will be needed in the vicinity of the Little Makalapa Housing Area, and a small portion of Hickam Air Force Base property will be needed in the vicinity of Nimitz Field for the guideway. DTS has coordinated with the Navy throughout the development of the Project.

General Comments/Concerns:

1) Navy and Air Force land: As described above, the Navy has been provided a map of areas required for the Project. Coordination with the Navy for use of Navy lands is ongoing. The most recent information regarding station design and right-of-way needs was presented to the Navy on June 12, 2009.

2) Navy utilities: As presented in Section 4.18.2 of this Final EIS, "Design criteria will govern all new utility construction outside of buildings, as well as the support, maintenance, relocation, and restoration of utilities encountered or affected by project construction." In addition, coordination will occur with property owners on factors including, but not limited to, underground utility service connections, access or driveway reconstruction, utility disruption, water service, grounding work, demolition, landscape protection, landscape restoration, fencing, mail delivery, and garbage collection. This will include notifying and working with the Navy regarding non-State roadways and roadway rights-of-way on Navy property.

3) Navy roadways and traffic patterns adjacent to Navy property: There will be no substantial additional wear and tear on Navy roadways as a result of commuter traffic to fixed guideway stations or park-and-ride lots. Any wear and tear resulting from construction will be repaired by the contractor upon completion of construction.

As shown in Table 5-40 in Addendum 02 to the Honolulu High-Capacity Transit Corridor Project Transportation Technical Report (DTS 2009i), the analysis of the effect of the park-and-ride trips to the Aloha Stadium Station was conducted at nine intersections adjacent to the proposed station. The access to and from Ford Island to the proposed park-and-ride station would be via the intersections of Kamehameha Highway at Salt Lake Boulevard (makai bound) and Kamehameha Highway at Ford Island Boulevard at Admiral Clarey Bridge/Salt Lake Boulevard (mauka bound). The analysis indicated that neither of these two intersections near the Aloha Stadium Station park-and-ride will experience an increase in delay compared to No Build Alternative.

4) Noise impacts to Navy housing areas: Additional noise measurement sites have been added between Aloha Stadium and Hickam Air Force base based on Navy concerns. The Project noise levels in this area have been added to Section 4.10 of the Final EIS. As discussed in this section, the noise monitoring was conducted at Betlo Place, Makalapa Guest House, Makalapa Drive, Community Center, and MWR Youth Field for the Final EIS. Moderate noise impacts will occur at Makalapa Guest House and Belto Place. However, the Project will include an integrated parapet wall at the edge of the guideway structure that extends three feet above the top of rail. The parapet wall with substantially reduce ground-level noise. Wheel skirts will increase the benefit from the parapet wall at locations above the elevation of the track. As a result, the Project will cause no noise impacts in this area. Once the Project is operating, noise levels will be remeasured to confirm that there are no noise impacts from the Project.

5) Construction impacts: As the Project proceeds to construction in the vicinity of Navy and Air Force facilities, the DTS will coordinate construction timing. The selected construction contractor will be required to keep the Navy and other neighbors informed of upcoming activities.

6) Impacts to Navy permits: As detailed in Section 4.14 of the Final EIS, the fixed guideway will not generate water pollution nor will it add to impervious surface. In the vicinity of Pearl Harbor, it will run above a currently paved area. DTS will continue to work with the Navy so that the Project will not impair Navy permit conditions.

7) Security concerns including proximity to Pearl Harbor Naval Station fenceline and housing/parking impacts: DTS is coordinating with the Navy regarding base security concerns. Section 2.5.4 of the Final EIS provides an overview of Safety and Security features of the Project. Specific security concerns have been addressed with the Navy through inter-governmental coordination beginning with the April 17, 2009 meeting. Appendix B, Preliminary Alignment Plans and Profiles, of this Final EIS includes the location and height of the system and stations.

The park-and-ride lot at Aloha Stadium will be located closer to a station than any of the listed areas above; therefore, users are likely to use the authorized parking at that location. Nonetheless, DTS has committed in the Final EIS to work with local property owners around stations to develop measures to limit the effects of potential spillover parking. As stated in Section 3.4.7 of the Final EIS, the approach to mitigating the effects of spillover parking will be unique to each station area. The City will conduct surveys to determine the extent of spillover parking demand near stations and implement one or more mitigation strategies as needed. Strategies include, but are not limited to, parking restrictions, parking regulations, permit parking, and/or shared parking arrangements. The specific mitigation strategies and the schedule for implementation will be determined as stations are opened. Parking surveys will be conducted prior to starting construction of a station, and again within six months after opening of the station.

Increased pedestrian traffic near Aloha Stadium station will primarily consist of residents accessing nearby residential communities and people walking to/from the stadium during events. In addition, some Arizona Memorial visitors will likely walk from the Aloha Stadium station along Kamehameha Highway (about a 10-minute walk) to reach the memorial. The primary users of the Pearl Harbor Navy Base station will be Base workers and some nearby residents or visitors. After getting off at the station, most pedestrians will walk directly to the Base.

8) Integration of public transportation with transit corridor stations: Chapter 3 in the Final EIS states: "The bus network will also be restructured to provide access from surrounding communities to the fixed guideway with more frequent bus service. Bus routes serving guideway stations will typically be shorter and will operate in less congested residential communities. These operations will help maintain service reliability compared to operations of longer-distance routes."

The restructured bus network serving the stations includes connections to the major employment centers on Oahu, including Pearl Harbor Naval Base and Hickam Air Force Base. These locations are currently served by TheBus routes and are frequently delayed due to traffic conditions outside of the military facilities. With the Project, these two employment areas will be served with all-day shuttles connected to the guideway. The Pearl Harbor shuttle (Route 312) is planned to provide 8-minute service in the peak hour with 30-minute mid-day frequency directly serving Pearl Harbor from the Aloha Stadium Station and Transit Center. The Hickam Air Force Base shuttle (Route 313) is planned to provide 15-minute service in the peak hour with 30-minute mid-day service. Future transit routes and frequencies are shown in a table and series of maps in Appendix D, Bus Transit Routes, of the Final EIS.

Other planned service improvements include:

1. *Reconfigured Route 314 will provide service to the entire island.*

2. *Reconfigured Route 312 will operate via Aloha Stadium Station to EB Kamehameha, right on Arizona to serve Pearl Harbor via Halawa Gate. The route will continue left on Neches, right on North Road, left on Kuahua, right on Jarvis, right on Northampton to Simms, right on Vincennes serving the Fleet and Industrial Supply Center. The route will continue along its current alignment and would enter/exit Pearl Harbor via Halawa Gate.*

3. *The Fleet and Industrial Supply Center will be served as described above.*

4. *Kuahua Avenue will be served as described above.*

5. *Although South Avenue will not be directly served under this plan, many of the buildings along South Avenue are served by Route 312 operating along Central Avenue.*

6. *New Route 315 will provide peak period weekday service to the office buildings in Makalapa Crater. The route will operate via Aloha Stadium to EB Kamehameha, left on Halawa Drive to Luapele Drive with a turnaround. Route 315 is approximately 1.35 miles roundtrip from Aloha Stadium Station and will offer 4:00 a.m. and 4:00 p.m. peak period trips.*

Shuttle service frequencies will be adjusted based upon passenger demand experience as the guideway is developed. Guideway connections for military residential and shopping areas have been designed based upon the same travel demand and access information as other areas on Oahu.

All of the transit centers (Aloha Stadium, Pearl Highlands, West Loch, and University of Hawaii at West Oahu) serving the guideway are being planned with space for bus shuttles not operated by the City, including the military's bus service, to pick up and drop off passengers.

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

9) Hazardous waste and materials and Installation Restoration (IR) sites: The Project will not affect the golf course site. No Navy property between Elliot Street and Moanalua Stream will be affected. This is shown in Appendix C, Preliminary Right-of-Way Plans, of the Final EIS. The individual issues in this comment are addressed to the "Specific Comments" section below. No impact to Navy hazardous materials/waste facilities are anticipated.

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

11) Archaeological, Cultural, and Historic Properties: DTS has consulted with the Navy on the Programmatic Agreement for the Project.

Specific Comments:

1) Section 4.5 Neighborhoods: The section discussing Aliamanu-Salt Lake Boulevard has been removed from the Final EIS. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with FTA's NEPA regulations that state that the Final EIS should focus on the Preferred Alternative (23 CFR § 771.125 (a)(1)). As stated previously, DTS does not anticipate substantial increased traffic by persons not affiliated with the Navy on Navy streets as a result of the Project.

2) Section 4.11 Hazardous Waste and Materials

a) In response to your comment, the second paragraph of Section 4.11.1 of the Draft EIS has been modified in Section 4.12.1 of this Final EIS to read "Hazardous waste in the City is primarily regulated by the Solid and Hazardous Waste Branch of the HDOH. The Solid and Hazardous Waste Branch is responsible for overseeing the Office of Solid Waste Management, the Underground Storage Tank Program, and the Hazardous Waste Program. The HDOH Office of Hazard Evaluation and Emergency Response is responsible for implementing the Hawaii Environmental Response Law (HRS 128D), the State Contingency Plan (HAR 11-451), and the Hawaii Emergency Planning and Community Right-to-Know Act (HRS 128E)."

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

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

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

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

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

g) The interior passenger area of the transit vehicles will use fluorescent light bulbs. Fluorescent light bulbs would also likely be used in station areas and other Project areas.

h i - iii) The information provided is noted. This has been reviewed during planning and design efforts to address potential contaminated soil and groundwater in these areas.

3) Section 4.15 Archaeological, Cultural, and Historic Resources

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

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

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

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

UNITED STATES DISTRICT COURT

CHAMBERS OF
HELEN GILLMOR
CHIEF UNITED STATES DISTRICT JUDGE

DISTRICT OF HAWAII
300 ALA MOANA BOULEVARD, C-400
HONOLULU, HAWAII 96850-0400

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November 18, 2008

08 NOV 21 P3:56
DTS
RAPID TRANSIT

Mr. Leslie T. Rogers
Regional Administrator
Federal Transit Administration
FTA Region IX
201 Mission Street
Suite 1650
San Francisco, CA 94105-1839

Re: Honolulu Rail Transit System (Honolulu High - Capacity Transit Corridor Project, 2008/PIM-1); Security Risk for Federal Court Building

Dear Mr. Rogers:

The undersigned Judges, being all of the United States Judges of the District of Hawaii, write to strongly voice our opposition to the proposed route of the Honolulu Rail Transit System on Halekauwila Street immediately adjacent to the Federal Court Building. The proposed Halekauwila Street route, or any route similarly close to the Federal Courthouse, raises unacceptable severe security concerns - exposing our Courthouse to potential terrorists' gunfire and/or bombing such as occurred in Oklahoma City and within trains in Madrid, or to a lone attack by an individual holding a grudge against a particular Judge. We understand that you have reviewed the initial draft Environmental Impact Statement submitted by the City and County of Honolulu. We believe there are suitable alternative routes other than Halekauwila Street.

On October 16th of this year we met with the Chief of the Rapid Transit Division of the Dept. of Transportation Services of the City and County of Honolulu, Mr. Kenneth Toru Hamayasu, to express our concern of the high security risk to which the Federal

Courthouse would be exposed should the rail transit system run on Halekauwila Street. He informed us that he did not feel there are any viable alternatives to Halekauwila Street and that any change would be highly unlikely and would require Honolulu City Council approval.[1/] We disagree that there are no reasonable alternatives.

We believe that Queen Street, King Street, Beretania Street, and possibly other streets could be utilized instead. We recognize, as does Mr. Hamayasu, that any route (including Halekauwila Street) presents problems.

We understand from our discussion with Mr. Hamayasu that the guideway structure will be 45 feet above street level and will pass within a mere 45 feet of the Federal Courthouse building. Our Court building is 4 stories high, so the guideway structure will be at the same level as the windows of three Judges' chambers. The guideway structure will be 25 feet wide, providing 2 sets of tracks for trains proceeding in either direction. There will be approximately 50 trains, with a train passing by our Courthouse during rush hours every 3 minutes in each direction. As noted in the draft Environmental Impact Statement, Halekauwila Street is an unusually narrow street. Morever, currently there is no public transport system along this street.

Subsequent to our meeting with Mr. Hamayasu, we met with the City's security committee. The security committee presented us with its security analysis entitled "Honolulu Rail Transit Project Potential Threats to Federal Court Building from Transit Viaduct", a copy of which is enclosed. The City's security committee acknowledged that this security analysis was prepared only after our earlier meeting with Mr. Hamayasu, and that previously no consideration had been given to the Federal Courthouse's unique security concerns. It was also noted that neither the U.S. Marshal nor any other federal court security representative was previously consulted or even contacted regarding a proposed transit line running along Halekauwila Street adjacent to the Federal Courthouse. The City's security committee also acknowledged that none of the security specialists who participated in preparing its analysis was familiar with security standards for Federal Courthouses.

[1/] You may be aware that the City Council is considering initially re-routing the rail transit system to run by the Honolulu Airport rather than the Salt Lake community.

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The City's security analysis concludes that "the possibility of an assault from the viaduct to the Courthouse is deemed to be most improbable for many reasons"; yet the analysis fails to effectively address our concerns. As an example, our primary concern is detonation of explosives placed inside a train triggered by a cell phone operated by terrorists from a far distance (similar to what occurred in the Madrid attacks). This could be accomplished in a number of ways; such as, several people carrying sufficient explosives boarding a train several stops before the Federal Courthouse and exiting one or two stops before the Courthouse after leaving the explosives on board, or simply by several suicide bombers. Further, the security enhancements suggested by the City's analysis would afford little, if any, protection from a major bomb blast within a passing train.

After the Oklahoma City bombing and the terrorists attacks of September 11, certain security issues affecting the Federal Courthouse were recognized, and concrete berms and planters were placed along Halekauwila Street to impede trucks with bombs from destroying our Court building as happened in Oklahoma City and Lebanon. A cable secured fence was constructed around the lawn area on the northwest side of the Courthouse, and security patrols were implemented.

We are still at war with terrorists who want to destroy us - and will be for years to come. Federal buildings have been prime targets.

Now the proposed rail transit system on Halekauwila Street would expose the Federal Courthouse to a much greater risk, similar to the train bombings which occurred in Madrid. We urge that you consider this security risk thoroughly, and we request that you require the transit system to utilize a street other than Halekauwila Street.

Please do not hesitate to contact us should you have any questions concerning the above.

Very truly yours,

Chief Judge Helen Gillmor

Judge Susan Oki Mollway

AR00000932

Judge J. Michael Seabright

Judge Samuel P. King

Judge Alan C. Kay

Magistrate Judge Barry M. Kurren

Magistrate Judge Leslie E. Kobayashi

Magistrate Judge Kevin S.C. Chang

Judge David A. Ezra has recused himself from consideration of this issue.

AR00000933

As the U.S. Marshal for the District of Hawaii, I concur with the above assessment of the Judges of this District that the proposed route of the Honolulu Rail Transit System on Halekauwila Street presents a severe security risk to the Federal Court building, and I join in opposing this route.

Dated: November 18, 2008.

Very truly yours,

Mark M. Hanohano
U.S. Marshal for the
District of Hawaii

cc: Kenneth Toru Hayamayu, P.E.
Chief, Rapid Transit Division
Department of Transportation Services
City and County of Honolulu

Ms. Sherry Little
Deputy Administrator
Federal Transit Administration

Potential Threats to Federal Court Building from Transit Viaduct

The construction of a transit viaduct in close proximity to the court house has been evaluated by security specialists for potential security vulnerabilities. As a result of this evaluation, the possibility of an assault from the viaduct to the court house is deemed to be most improbable for many reasons, including: lack of access to viaduct, easy detection of trespassers, lack of sufficient time to plan an attack, lack of time to carry out an attack, lack of a plausible escape route by a perpetrator, challenge of coordination between train schedules and target availability, and alternatives for accomplishing such an assault which would have significantly less risk of failure.

The evaluation team included a PB Force Protection Specialist with extensive DOD experience, a PB Senior Security Specialist who was a former DHS/TSA executive for Mass Transit and a PB Senior Safety and Security Specialist who was the former DOT/FTA Director of Safety and Security. All of these specialists have conducted numerous vulnerability assessments for transit systems, and maintain high security clearances and liaisons with their prior agencies for current threats, threat trends and security best practices.

Part of the evaluation process was examining similar systems the team is familiar with: the Miami Dade People Mover, Detroit People Mover and Seattle Monorail all travel within close proximity of buildings and in some cases within 50 feet. The Detroit People Mover is adjacent to the federal court house. There have never been any threats or incidents from the People Mover.

The evaluation team contacted the intelligence community regarding this possible threat. Factors considered that would dissuade this type of an assault are: lack the ability of "dry runs", challenged by timing of the target versus train schedules, possibility of being detected (during planning and execution of the attack) and the lack of a good escape method. The team also checked for new or existing current threats that would affect this situation; none were identified.

Significant challenges for anyone attempting an assault from the viaduct include an intrusion detection system protecting entrances to the track area, complemented with CCTVs specifically pointed from platform ends to track area. Trespassers will be detected and a response generated, making it very difficult for a sniper to carry out surveillance or an attack successfully.

Security standards for federal buildings are published by the US General Services Administration. After 9/11, the standards were categorized listed as sensitive security information (SSI) and are no longer available without a specific need to know. The US Protective Services and the US Marshals have access to this information. Judges need to confer with them for any guidance in this matter.

A requirement in the System Safety Management Plan (SSMP) is the development of a Security Plan for the construction phase of the project. The construction contractor will be required to develop the plan and address security issues such as this one. There are a variety of measures that can be implemented, including security fencing to restrict access to the guideway, lighting to aid in detection, intrusion detection systems, and security patrols.

Though the evaluation team found this threat to be most improbable, the following security enhancements for the courthouse can be taken:

- Obscure the direct line of view from the viaduct. Installing a screening wall along the viaduct in the areas of access where there is a direct line of view to the courthouse will reduce opportunities for surveillance of the building and access to areas where a direct fire event could be launched.

- Window glass film/frame anchoring. Attaching a clear or tinted composite film over the window's glass to resist a direct fire or blast overpressure; also, it keeps the glass panel together as a single unit, thus reducing flying glass shards (Kobar Towers). However, window frames require anchoring to the building structure and a horizontal catch bar should be installed on the inside of the window to 'catch' the glass panel if the frame fails, thus, preventing the glass panel from becoming a missile hazard.

- Relocate the Judges Chambers. Relocating the judges' chambers to an area of the building that has limited or no direct line of view and limited entry, multi-level access controls. Remove any public, external, or internal identification, signs, boards, menu's, entrances, etc that list directions or locations to Chambers.

- Tint Chamber windows. Prevent the public from seeing into the Chambers to determine if they are occupied by applying a reflective film over the windows. This may also provide environmental conditioning savings to the building and prevent ultra-violet damage to office property.

AR00000936

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT11/08-288564R

The Honorable Helen Gillmor, Chief Judge
U.S. District Court
District of Hawaii
300 Ala Moana Boulevard, C-400
Honolulu, Hawaii 96850-0400

Dear Judge Gillmor:

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

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Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

DEPARTMENT OF TRANSPORTATION SERVICES

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT11/08-288564R

The Honorable Susan Oki Mollway, Judge
U.S. District Court
District of Hawaii
300 Ala Moana Boulevard
Honolulu, Hawaii 96850-0400

Dear Judge Mollway:

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

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

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Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT11/08-288564R

The Honorable J. Michael Seabright, Judge
U.S. District Court
District of Hawaii
300 Ala Moana Boulevard
Honolulu, Hawaii 96850-0400

Dear Judge Seabright:

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

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Director

Enclosure

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT11/08-288564R

The Honorable Samuel P. King, Judge
U.S. District Court
District of Hawaii
300 Ala Moana Boulevard
Honolulu, Hawaii 96850-0400

Dear Judge King:

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

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT11/08-288564R

The Honorable Alan C. Kay, Judge
U.S. District Court
District of Hawaii
300 Ala Moana Boulevard
Honolulu, Hawaii 96850-0400

Dear Judge Kay:

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

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WAYNE Y. YOSHIOKA
Director

Enclosure

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT11/08-288564R

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

Dear Judge Kurren:

Subject: Honolulu High-Capacity Transit Corridor Project
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Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Governor of the State of Hawaii are the next anticipated actions and will conclude the environmental review process for this Project.

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT11/08-288564R

The Honorable Leslie E. Kobayashi, Magistrate Judge
U.S. District Court
District of Hawaii
300 Ala Moana Boulevard
Honolulu, Hawaii 96850-0400

Dear Judge Kobayashi:

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

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

The City has received documents from the U. S. General Services Administration (GSA) related to the security needs of the Federal Building. Representatives from the Project's Safety and Security Department have met with GSA and Court staff to address security concerns on October 16 and November 10, 2008, and on February 3 and March 31, 2009, and will continue to work with GSA staff on security concerns. The Project has been working with property management staff from the GSA. We will commit to meet all applicable setback requirements in addition to other security measures as discussed directly with the GSA to safeguard the Department of Justice and other federal staff. A safety and security plan is being developed for the Project, which will take into account the unique security concerns of the Federal Building.

Queen Street, King Street, and Beretania Street were previously evaluated during the Alternatives Analysis process for either an elevated or underground alignment and determined to be inferior to Halekauwila Street based on a number of considerations. An alignment that avoided Halekauwila Street was evaluated at two stages of the Alternatives Analysis process. This alignment had significant visual impacts, impacts on historic properties, evidence of burials within the vicinity of Queen Street near Kawaiahao Church, impacts on street traffic patterns, and severe engineering constraints, and was not

brought forward into the Draft EIS for these reasons. As stated in the Alternatives Screening Memo (Chapter 6), an alignment along Queen Street, rather than Halekauwila Street, had been proposed for screening. Following initial scoping of the alternatives and further engineering analysis, however, it was determined that the Queen Street alignment might not prove to be feasible. As noted in the Alternatives Screening Memo (Page 6-3), "The elevated alignment [along Queen Street] would have to pass very near high-rise buildings in some locations. Locating stations within the physical constraints of this alignment is a particular challenge." Both the Queen Street and the Halekauwila Street alignments were advanced to the Alternatives Analysis. While the Halekauwila Street alignment was acknowledged to have the potential for visual impacts on the Aloha Tower, this impact was evaluated in the context of the fact that the Queen Street alignment would have the same impact to Aloha Tower and would have impacts on a number of historical resources. The Queen Street alignment would have significant visual impacts. As noted in the Alternatives Analysis (Pages 6-4 to 6-5), "The Queen Street alignment would have somewhat greater negative visual impact because the narrow available right-of-way would require a stacked alignment in the Downtown area and because it would cross between Hale Auhau and the rest of the Hawaii Capital Historic District. The Nimitz Highway/Halekauwila Street/Kapiolani Boulevard alignment would be the best alignment option within Section V." The Capital Historic District is not affected by the Halekauwila alignment. As a result, the Queen Street alignment did not advance from the Alternatives Analysis to the Draft EIS.

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

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

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

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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

MUFI HANNEMANN
MAYOR

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June 11, 2010

RT11/08-288564R

The Honorable Kevin S.C. Chang, Magistrate Judge
U.S. District Court
District of Hawaii
300 Ala Moana Boulevard
Honolulu, Hawaii 96850-0400

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RT11/08-288564R

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WAYNE Y. YOSHIOKA
Director

Enclosure

UNITED STATES DISTRICT COURT

CHAMBERS OF
HELEN GILLMOR
CHIEF UNITED STATES DISTRICT JUDGE

DISTRICT OF HAWAII
300 ALA MOANA BOULEVARD, C-400
HONOLULU, HAWAII 96850-0400

TELEPHONE
(808) 541-3502
FACSIMILE
(808) 541-3579

January 22, 2009

The Honorable Todd K. Apo, Councilmember
Honolulu City Council
530 S. King Street, Room 202
Honolulu, HI 96913

Re: Honolulu Rail Transit System (Honolulu High Capacity Transit Corridor Project, 2008/PIM-1); Security Risk for Federal Court Building

Dear Councilman Apo:

I write on behalf of the Judges of the United States District Court to strongly voice our opposition to the proposed route of the Honolulu Rail Transit System on Halekauwila Street immediately adjacent to the Federal Court Building. The proposed Halekauwila Street route, or any route similarly close to the Federal Courthouse, raises unacceptable severe security concerns - exposing our Courthouse to potential terrorists' gunfire and/or bombing such as occurred in Oklahoma City and within trains in Madrid, or to a lone attack by an individual holding a grudge against a particular Judge. We believe there are suitable alternative routes other than Halekauwila Street (such as Queen Street, which we understand from Mr. Kenneth Toru Hamayasu, Chief of the Rapid Transit Division of the Department of Transportation Services of the City and County of Honolulu, was the City's initial choice for this route).

We previously expressed our deep concern over this matter by letter dated November 28, 2008, to Mr. Leslie T. Rogers, Regional Administrator of the Federal Transit Administration. We reiterated our position by letter dated December 9, 2008, addressed to The Honorable Nestor Garcia, Chairman of the City Council Transportation and Public Works

Committee. Copies of both of these letters were sent to Mr. Hamayasu.

We received a response dated December 24, 2008 from Mr. Wayne Y. Yoshioka, Director of the Department of Transportation Services of the City and County of Honolulu, informing us that any changes to the rail transit system route on Halekauwila Street would require City Council action. Accordingly, we are now addressing our concerns directly to the City Council.

We understand from an article in the Honolulu Advertiser on January 3, 2009, that the City intends to pursue an "aggressive schedule," including such steps as promptly issuing requests for proposals on design/build contracts for the project's first phase, and revising a final Environmental Impact Statement for Federal approval. An article in the Honolulu Advertiser on January 11, 2009, reports that a risk management feasibility study contract will be awarded next month, and that the City has introduced Bill 63 to allow the City administration to seek construction proposals without Council approval. We urge the City Council to consider relocating the rail transit system route to avoid Halekauwila Street before making any costly commitments as to this route prior to the final review by the Federal Transit Administration.

On October 16 of last year we met with Mr. Hamayasu to express our concern about the high security risk to which the Federal Courthouse would be exposed should the rail transit system run on Halekauwila Street. He informed us that he did not feel there are any viable alternatives to Halekauwila Street, and that any change would be highly unlikely and would require Honolulu City Council approval. We disagree that there are no reasonable alternatives. We believe that Queen Street, King Street, Beretania Street, and possibly other streets could be utilized instead. We recognize, as does Mr. Hamayasu, that any route (including Halekauwila Street) presents problems.

We understand from our discussion with Mr. Hamayasu that the guideway structure will be 45 feet above street level and will pass within a mere 45 feet of the Federal Courthouse building. Our Court building is 4 stories high, so the guideway structure will be at the same level as the windows of three Judges' chambers. The guideway structure will be 25 feet wide, providing 2 sets of tracks for trains proceeding in either direction. There will be approximately 50 trains, with a train passing by our Courthouse during rush hours every 3 minutes in

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each direction. As noted in the draft Environmental Impact Statement, Halekauwila Street is an unusually narrow street. Morever, currently there is no public transport system along this street.

Subsequent to our meeting with Mr. Hamayasu, we met with the City's security committee. The security committee presented us with its security analysis entitled "Honolulu Rail Transit Project Potential Threats to Federal Court Building from Transit Viaduct". The City's security committee acknowledged that this security analysis was prepared only after our earlier meeting with Mr. Hamayasu, and that previously no consideration had been given to the Federal Courthouse's unique security concerns. It was also noted that neither the U.S. Marshal nor any other federal court security representative was previously consulted or even contacted regarding a proposed transit line running along Halekauwila Street adjacent to the Federal Courthouse. Nor was the owner of the Federal Building and Courthouse given any notice of the proposed Halekauwila Street route. We enclose a copy of letter dated December 15, 2008, from Michael D. Larson, Property Manager, U.S. General Services Administrator, Public Building Service, PJKK Federal Building, 300 Ala Moana Boulevard, expressing concerns over the Halekauwila Street route and the lack of any notice. The City's security committee also acknowledged that none of the security specialists who participated in preparing its analysis was familiar with security standards for Federal Courthouses.

The City's security analysis concludes that "the possibility of an assault from the viaduct to the Courthouse is deemed to be most improbable for many reasons;" yet the analysis fails to effectively address our concerns. As an example, our primary concern is detonation of explosives placed inside a train triggered by a cell phone operated by terrorists from a far distance (similar to what occurred in the Madrid attacks). This could be accomplished in a number of ways; such as, several people carrying sufficient explosives boarding a train several stops before the Federal Courthouse and exiting one or two stops before the Courthouse after leaving the explosives on board, or simply by several suicide bombers. Further, the security enhancements suggested by the City's analysis would afford little, if any, protection from a major bomb blast within a passing train.

After the Oklahoma City bombing and the terrorists attacks of September 11, certain security issues affecting the Federal Courthouse were recognized, and concrete berms and

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planters were placed along Halekauwila Street to impede trucks with bombs intent on destroying our Court building as happened in Oklahoma City and Lebanon. A cable secured fence was constructed around the lawn area on the northwest side of the Courthouse, and security patrols were implemented.

We are still at war with terrorists who want to destroy us - and will be for years to come. Federal buildings have been prime targets.

The proposed rail transit system on Halekauwila Street would expose the Federal Courthouse to a much greater risk, similar to the train bombings which occurred in Madrid. We urge that you consider this security risk thoroughly, and we request that the City re-route the transit system to utilize a street other than Halekauwila Street.

Please do not hesitate to contact us should you have any questions concerning the above. Our judges would be pleased to meet with you and show you the close proximity of the proposed guideway structure to our chambers.

Very truly yours,

Chief Judge Helen Gillmor

AR00000959

As the U.S. Marshal for the District of Hawaii, I concur with the above assessment of the Judges of this District that the proposed route of the Honolulu Rail Transit System on Halekauwila Street presents a severe security risk to the Federal Court building, and I join in opposing this route.

Dated: January 23, 2009.

Very truly yours,

Mark M. Hanohano
U.S. Marshal for the
District of Hawaii

Enclosure

cc: Mr. Leslie T. Rogers
Regional Administrator
Federal Transit Administration

Ms. Sherry Little
Deputy Administrator
Federal Transit Administration

Kenneth Toru Hamayasu, P.E.
Chief, Rapid Transit Division
Department of Transportation Services
City and County of Honolulu

Mr. Wayne Yoshioka
Director of the Department
of Transportation Services

Mr. Harry Berliner
Department of Transportation Services

AR00000960

DEPARTMENT OF TRANSPORTATION SERVICES

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June 11, 2010

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

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Since the publication of the Draft EIS, DTS has coordinated directly with the U. S. General Services Administration (GSA) on safety and security concerns at the Federal Courthouse building. GSA has provided documents allowing a more comprehensive determination of security needs. The Project's Safety and Security experts will continue to work with GSA staff on security concerns. Project staff have been working with property management staff from the GSA. We will commit to meet all applicable setback requirements in addition to other security measures as discussed directly with the GSA to safeguard the Department of Justice and other federal staff. DTS met with representatives of the Court and GSA on October 16 and November 10, 2008, and on February 3 and March 31, 2009. A threat and vulnerability assessment was developed for the Federal Building, including the Federal Courthouse. The assessment was provided to GSA.

An alignment that avoided Halekauwila Street was evaluated at two stages of the Alternatives Analysis process. A Queen Street alignment had significant visual impacts, impacts on historic properties, evidence of burials within the vicinity of Queen Street near Kawaiahao Church, impacts on street traffic patterns, and severe engineering constraints, and was not brought forward into the Draft EIS for these reasons. As stated in the Alternatives Screening Memo (Chapter 6), an alignment along Queen Street, rather than Halekauwila Street, had been proposed for screening. Following initial

scoping of the alternatives and further engineering analysis, however, it was determined that the Queen Street alignment might not prove to be feasible. As noted in the Alternatives Screening Memo (Page 6-3), "The elevated alignment [along Queen Street] would have to pass very near high-rise buildings in some locations. Locating stations within the physical constraints of this alignment is a particular challenge." Both the Queen Street and the Halekauwila Street alignments were advanced to the Alternatives Analysis. While the Halekauwila Street alignment was acknowledged to have the potential for visual impacts on the Aloha Tower, this impact was evaluated in the context of the fact that the Queen Street alignment would have the same impact to Aloha Tower and would have impacts on a number of historical resources. The Queen Street alignment would have significant visual impacts. As noted in the Alternatives Analysis (Pages 6-4 to 6-5), "The Queen Street alignment would have somewhat greater negative visual impact because the narrow available right-of-way would require a stacked alignment in the Downtown area and because it would cross between Hale Auhau and the rest of the Hawaii Capital Historic District. The Nimitz Highway/Halekauwila Street/Kapiolani Boulevard alignment would be the best alignment option within Section V." The Capital Historic District is not affected by the Halekauwila alignment. As a result, the Queen Street alignment did not advance from the Alternatives Analysis to the Draft EIS.

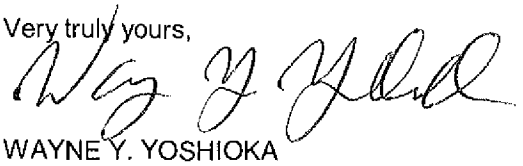
The City Council received the letter provided by the Courts. It was forwarded to DTS Rapid Transit Division, for response in the Final EIS.

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

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

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

Very truly yours,



WAYNE Y. YOSHIOKA
Director

Enclosure

Governor of the State of Hawaii are the next anticipated actions and will conclude the environmental review process for this Project.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105-3901

February 12, 2009

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

Subject: Draft Environmental Impact Statement for the Proposed Honolulu High-Capacity Transit Corridor Project, Oahu, Hawaii (CEQ #20080469)

Dear Mr. Matley:

The Environmental Protection Agency (EPA) has reviewed the above-referenced document pursuant to the National Environmental Policy Act (NEPA), Council on Environmental Quality (CEQ) regulations (40 CFR Parts 1500-1508), and Section 309 of the Clean Air Act. Our detailed comments are enclosed.

While EPA supports the goal of providing transportation choices to the communities of Oahu, we have some concerns related to wetlands, water quality, environmental justice, and noise impacts. EPA has rated this document EC-2, *Environmental Concerns, Insufficient Information*. Please see the attached *Rating Factors* for a description of our rating system.

We are particularly concerned that the Draft Environmental Impact Statement (DEIS) does not contain any quantitative information about the location, acreage, and potential impacts to aquatic resources, hydrology, and waters of the United States in the project area. Impacts to waters of the United States will be subject to Clean Water Act (CWA) Section 404 (b)(1) Guidelines (40 CFR 230). If it is determined that an Individual Permit is required, only the Least Environmentally Damaging Practicable Alternative (LEDPA) can be permitted pursuant to the 404 (b)(1) Guidelines. In addition, without any data regarding potential impacts to hydrologic flows and potential downstream impacts, it is difficult to determine whether significant impacts may occur and what mitigation commitments are needed. EPA recommends that a meeting be scheduled with our wetlands staff and staff of the U.S. Army Corps of Engineers Regulatory Branch to discuss CWA requirements and potential project impacts to hydrology in the area.

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We are also concerned that required consultation processes, such as 1) Section 106 consultation for potential impacts to historic and archaeological resources, 2) the water quality assessment associated with the sole source aquifer, and 3) the determination of consistency with the Hawaii Coastal Zone Management Program, have not been completed. These processes should be completed prior to publication of the Final Environmental Impact Statement (FEIS) in order to determine whether or not significant impacts will result. The FEIS should document the specific consultation processes, any additional impacts identified through this coordination, and all resulting mitigation commitments.

Finally, while we believe that most of the alternatives eliminated prior to the DEIS are documented sufficiently, we have remaining questions about why light rail or bus rapid transit in an exclusive right-of-way were not considered as reasonable alternatives in the DEIS. Additional information should be included in the FEIS explaining why these technologies were not considered to be reasonable alternatives and were therefore not reviewed in the DEIS.

We appreciate the opportunity to review this DEIS and look forward to future coordination on the project. When the FEIS is released for public review, please send two copies to the address above (mail code: CED-2). If you have any questions, please contact Connell Dunning, Transportation Team Leader, at 415-947-4161, or Carolyn Mulvihill, the lead reviewer for this project, at 415-947-3554 or mulvihill.carolyn@epa.gov.

Sincerely,

Connell Dunning

FOR Kathleen M. Goforth, Manager
Environmental Review Office (CED-2)

Enclosures:
Summary of EPA Rating Definitions
EPA's Detailed Comments

cc: Wayne Y. Yoshioka, Department of Transportation Services, City and County of Honolulu
Susan Meyer, U.S. Army Corps of Engineers

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Alternatives Analysis

EPA recognizes that a significant amount of analysis of alternatives has taken place and has been documented prior to the Draft Environmental Impact Statement (DEIS). While we believe that most of the alternatives eliminated prior to the DEIS are documented sufficiently, we have remaining questions about why light rail or bus rapid transit in an exclusive right-of-way were not considered as reasonable alternatives in the DEIS. The Final Environmental Impact Statement (FEIS) should identify the specific rationale behind the elimination of these technologies from consideration.

Recommendation:

- Include additional information in the FEIS explaining why light rail or bus rapid transit in an exclusive right-of-way were not considered to be reasonable alternatives and were therefore not reviewed in the DEIS. If these technologies may have resulted in fewer environmental impacts, further justification is warranted to substantiate why those less damaging alternatives were not carried through for consideration.

It is also our understanding that modifications to the alignment described in the DEIS are being considered in order to avoid federal facilities in the current project area. These changes and the impacts associated with them should be described in the FEIS, along with the reasons for considered modifications. If significant variations from the analyzed alternatives are proposed, the Federal Transit Administration (FTA) and the Department of Transportation Services (DTS) should consider preparing a Supplemental DEIS for public review. EPA is available to discuss with FTA and DTS the appropriate level of environmental documentation needed should new information be incorporated into the document.

Recommendation:

- Include information in the FEIS about any changes to the proposed alignment and impacts associated with those changes. Consult EPA regarding the appropriate level of documentation.

We understand that the project will eventually include extensions of the proposed project on both ends of the initial segment. However, the extensions to the project were not analyzed in this DEIS. It is critical that selection of the alternative for the initial segment not preclude a reasonable range of alternatives for those future extensions. Given that the proposed project is an elevated structure, there are few remaining alternative sites where the subsequent extension projects can "link" to the project. The extensions should be viewed as reasonably foreseeable future actions and, as such, should be analyzed thoroughly in the cumulative impact analysis. Specifically, what additional

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resources of concern will be affected should the proposed action be carried forward and should the proposed extensions be built?

Recommendation:

- Ensure that selection of the alternative for the initial segment will not preclude a reasonable range of alternatives for future extensions. Include an analysis of potential impacts, and mitigation for those impacts, that would occur should the extensions to the project be built. Identify all reasonably foreseeable future actions associated with the placement of the proposed project as well as the impacts to resources from those future actions. Provide any mitigation for these identified cumulative effects.

Wetlands and Waters

In our January 6, 2006 and April 13, 2007 scoping comments, EPA stated that the DEIS should disclose the approximate area of waters of the United States that occur within the study area of the proposed project, including permanent and intermittent streams and wetlands. The Clean Water Act (CWA) Section 404(b)(1) Guidelines at 40 CFR Part 230.10(a) state that "... no discharge of dredged or fill material shall be permitted if there is a practicable alternative to the proposed discharge which would have less adverse impact on the aquatic ecosystem, so long as the alternative does not have other significant adverse environmental consequences." While the DEIS states that "no direct impacts to wetlands are expected" (page 4-134), EPA believes that it is likely that the project will have both direct and indirect impacts to waters of the United States. FTA and DTS will have to demonstrate that potential impacts to waters of the United States have been avoided and minimized to the maximum extent practicable prior to obtaining a CWA Section 404 permit (40 CFR 230.10(a) and 230.10(d)). Our scoping comments further recommended that the following information be included in the DEIS, and we reiterate that this information should be included in the FEIS.

We also recommend that DTS meet with EPA wetlands staff and staff of the U.S. Army Corps of Engineers to discuss Section 404(b)(1) requirements. Please contact Wendy Wiltse of EPA's Honolulu office at 808-541-2752 to arrange a meeting.

Recommendations:

- Work with EPA and the Corps to acquire a *jurisdictional delineation* of waters of the United States and impacts to those waters in the project area.
- Demonstrate that all potential impacts to waters of the United States have been avoided and minimized. If these resources cannot be avoided, clearly demonstrate how cost, logistical, or technological constraints preclude avoidance and minimization of impacts.
- Quantify the benefits from measures and modifications designed to avoid and minimize impacts to water resources; for example, number of stream crossings avoided, acres of waters of the United States avoided, etc.

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- Identify all protected resources with special designations and all special aquatic sites[1] and waters within state, local, and federal protected lands. Additional steps should be taken to avoid and minimize impacts to these areas.
- Identify and commit to mitigation for any unavoidable impacts. Include a timeframe for implementation of mitigation commitments along with the responsible party.

Water Quality

The DEIS states that a Water Quality Impact Assessment is underway, as required in areas that depend upon a sole source aquifer for drinking water. The results of this assessment should be included in the FEIS.

The DEIS also states that the project's consistency with the objectives and policies of the Hawaii Coastal Zone Management Program will be reviewed by the Department of Business, Economic Development & Tourism (DBEDT) Office of Planning. This review should be completed and documented in the FEIS.

While we support DTS's plan to implement permanent best management practices (BMPs) to manage stormwater runoff, we do not believe that there is sufficient information in the DEIS to document that the project will have no adverse impacts on water quality due to increased pollutants in stormwater. Additional information is needed in the FEIS to support the conclusion that there will be no adverse impacts to water quality. Where the proposed project will widen existing roads, the current stormwater detention basins and structures should be evaluated to determine if they will continue to be effective. We also recommend the use of green infrastructure as part of stormwater management. Detailed information about green infrastructure approaches is available at http://cfpub.epa.gov/npdes/greeninfrastructure/technology.cfm.

The FEIS should also include a discussion of other impacts the project may have on local hydrology, such as sediment transport, groundwater recharge, and flood attenuation, and how these impacts would be minimized or mitigated.

Recommendations:

- Include the results of the sole source aquifer water quality assessment in the FEIS and confirm that no significant impacts will result. Identify specific mitigation measures for any potential impacts.
- Include a discussion of the DBEDT Office of Planning review of the project's consistency with the Coastal Zone Management Program and confirm that the project is consistent with the program.

[1] Special aquatic sites are defined at 40 CFR 230.40 – 230.45 and include wetlands, mud flats, vegetated shallows, coral reefs, and riffle and pool complexes.

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- Consider including green infrastructure in the permanent BMPs for stormwater management and document the BMPs in the FEIS.
- Identify the project's impacts on local hydrology, such as sediment transport, groundwater recharge, and flood attenuation in the FEIS rather than waiting to analyze these impacts at a future date. Include specific mitigation commitments in the FEIS and identify how these mitigation actions will reduce impacts to surface hydrology. Include an analysis of potential hydrological impacts due to the reasonably foreseeable future extensions of the proposed project.

Noise Impacts

The DEIS, including the visual impact simulations, indicate that residents in a number of areas may experience significant noise impacts due to the proximity of the project to homes. EPA encourages DTS to consider noise abatement measures not specified in the DEIS, such as noise insulation of receptor sites.

EPA also recommends that particular attention be given to potential noise impacts and mitigation in the vicinity of Pearl Harbor and the USS Arizona Memorial.

Recommendations:

- Consider additional noise abatement measures, such as noise insulation of receptor sites, for residences and other sensitive receptors that would experience noise impacts. Provide quantitative information in the FEIS on the decrease in noise impacts from additional mitigation strategies.
- Provide additional noise mitigation in the vicinity of Pearl Harbor and the USS Arizona Memorial, if necessary to preserve the contemplative nature of the site.

Environmental Justice

EPA previously provided feedback on the environmental justice (EJ) analysis methodology proposed for this project, which was based on the Oahu Metropolitan Planning Organization's method for determining EJ areas. While we believe that the DEIS appropriately identifies EJ areas, we have concerns about the proposed relocation of residents of the Banana Patch community, which is identified in the DEIS as an EJ area of concern. We encourage DTS to choose an alternative alignment that would avoid relocation of this community. If no reasonable avoidance alternative exists, EPA recommends that extensive efforts be made to communicate and consult with the community in planning and implementing the project, and that all past and future consultation activities with this community be documented in the FEIS.

In addition, EPA recommends that additional assistance be provided to any other residents of environmental justice communities who will be relocated.

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Recommendations:

- Identify an alternative alignment that would avoid the Banana Patch community and alter the proposed action to accommodate this modification.
- Document the content and outcomes of the community meeting held with the Banana Patch community, as well as any other past or planned communication with the community, in the FEIS.
- Identify and commit to specific mitigation measures to minimize the impacts of relocation on low-income and minority populations.
- Conduct interviews with all potential displacees who have special needs to ensure that issues are fully identified and a plan for assistance is prepared. Based on the results from these interviews, identify and commit to additional measures to minimize the impacts of relocation, such as providing translation services, transportation to visit potential replacement housing, and/or additional relocation specialists to work with these communities.

Section 106 Consultation

The DEIS states that Section 106 consultation is ongoing. The consultation process should be completed prior to release of the FEIS and the process and required mitigation should be documented. This is critical to the determination of whether the project will have significant impacts on historical resources.

Recommendation:

- Complete the Section 106 process and document all related mitigation commitments in the FEIS. Confirm in the FEIS that the Section 106 consultation process included analysis of potential impacts from the reasonably foreseeable future action of the proposed extension of the project. Identify what, if any, additional impacts to historical properties may occur with future extensions of the project.

Invasive Species

EPA's January 6, 2006 and April 13, 2007 scoping comments included recommendations for minimizing the spread of invasive species. The islands of Hawaii are particularly vulnerable to invasive species, and construction associated with the project has the potential to aid in the establishment of invasive plants along any newly disturbed corridors. We reiterate our recommendations below and request that they be addressed in the FEIS.

Recommendations:

- In accordance with Executive Order 13112, identify proposed methods to minimize the spread of invasive species and utilize native plant and tree species where revegetation is planned.

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- Coordinate invasive species management with local agencies and organizations, such as the Oahu Invasive Species Committee: a voluntary partnership organized to prevent new invasive species infestations on the island of Oahu, to eradicate incipient invasive species, and to stop established invasive species from spreading on Oahu (http://www.hear.org/oisc/).
- Coordinate measures to reduce the potential for the spread of invasive species with other ongoing planning efforts. Additional resources related to Federal and State programs to address invasive species can be found at: http://www.invasivespeciesinfo.gov/

Visual Impacts

The DEIS indicates that there may be significant visual impacts resulting from the project. Context sensitive design can be used to mitigate these impacts.

Recommendation:

- Utilize context sensitive design, including neighborhood-based design guidelines and community input, as much as possible to mitigate the project's visual impacts.

Climate Change

Research on global climate change indicates that many coastal areas may be impacted in the future by sea level rise. The IPCC projects that global sea level will rise between 7 and 23 inches by the end of the century (2090–2099) relative to the base period (1980–1999). According to the IPCC, the average rate of sea level rise during the 21st century is very likely to exceed the 1961–2003 average rate. Storm surge levels are also expected to increase due to projected sea level rise. Combined with non-tropical storms, rising sea level extends the zone of impact from storm surge and waves farther inland, and will likely result in increasingly greater coastal erosion and damage.[2]

Recommendation:

- Include a discussion in the FEIS of the potential impacts of climate change on the proposed project and identify adaptive management strategies to protect the project area from those impacts.

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[2] IPCC, 2007b: Summary for Policymakers. In: *Climate Change 2007: Impacts, Adaptation and Vulnerability. Contribution of Working Group II to the Fourth Assessment Report of the Intergovernmental Panel on Climate Change* [Parry, M.L., O.F. Canziani, J.P. Palutikof, P.J. van der Linden and C.E. Hanson (eds.)]. Cambridge University Press, Cambridge, United Kingdom and New York, NY, USA.

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DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT10/09-338276

Ms. Kathleen M. Goforth, Manager
Environmental Review Office
U.S. Environmental Protection Agency
75 Hawthorne Street
San Francisco, California 94105-3901

Dear Ms. Goforth:

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

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

Alternatives Analysis

The Transportation System Management Alternative that was evaluated in the Alternatives Analysis included aspects of bus rapid transit. As summarized in Chapter 2 of the Draft EIS, while the alternative had merit for cost-ffectiveness, its overall system benefit would be very low. Light rail technology was not eliminated; however, at-grade light-rail would not meet Project speed and reliability requirements. Additional clarification has been included in Chapter 2 in this Final EIS regarding the Alternatives Analysis. These alternatives were not advanced for further environmental analysis since they did not meet the purpose and need.

The Alternatives Screening Memorandum (DTS 2006a) recognized the visually sensitive areas in Kakaako and Downtown Honolulu, including the Chinatown, Hawaii Capital, and Thomas Square/Academy of Arts Special Design Districts. To minimize impacts on historic resources, visual aesthetics, and surface traffic, the screening process considered 15 combinations of tunnel, at-grade, or elevated alignments between Iwilei and Ward Avenue. Five different alignments through Downtown Honolulu were advanced for further analysis in the Alternatives Analysis, including an at-grade portion along Hotel Street, a tunnel under King Street, and elevated guideways along Nimitz Highway and Queen Street.

The Alternatives Analysis Report (DTS 2006b) evaluated the alignment alternatives based on transportation and overall benefits, environmental and social impacts, and cost considerations. The report found that an at-grade alignment along Hotel Street would require the acquisition of more parcels and affect more potential burial sites than any of the other alternatives considered. The alignment with at-grade operation Downtown and a tunnel through the Capital Historic District, in addition to the environmental effects such as impacts to cultural resources, reduction of street capacity, and property acquisition requirements of the at-grade and tunnel sections, would cost an additional $300 million.

The Project's purpose is "to provide high-capacity rapid transit" in the congested east-west travel corridor (see Section 1.7 of the Final EIS). The need for the Project includes improving corridor mobility and reliability. The at-grade alignment would not meet the Project's Purpose and Need because it could not satisfy the mobility and reliability objectives of the Project (see bullets below). Some of the technical considerations associated with an at-grade versus elevated alignment through Downtown Honolulu include the following:

- ***System Capacity, Speed, and Reliability:*** *The short, 200-foot (or less) blocks in Downtown Honolulu would permanently limit the system to two-car trains to prevent stopped trains from blocking vehicular traffic on cross-streets. Under ideal operational circumstances, the capacity of an at-grade system could reach 4,000 passengers per hour per direction, assuming optimistic five minute headways. Based on travel forecasts, the Project should support approximately 8,000 passengers in the peak hour by 2030. Moreover, the Project can be readily expanded to carry over 25,000 in each direction by reducing the interval between trains (headway) to 90 seconds during the peak period. To reach a comparable system capacity, speed, and reliability, an at-grade alignment would require a fenced, segregated right-of-way that would eliminate all obstacles to the train's passage, such as vehicular, pedestrian, or bicycle crossings. Even with transit signal priority, the at-grade speeds would be slower and less reliable than an elevated guideway. An at-grade system would travel at slower speeds due to the shorter blocks, tight and short radius curves in places within the constrained and congested Downtown street network, the need to obey traffic regulations (e.g., traffic signals), and potential conflicts with other at-grade activity, including cars, bicyclists, and pedestrians. These effects mean longer travel times and far less reliability than a fully grade-separated system. None of these factors affect an elevated rail system. The elevated rail can travel at its own speed any time of the*

day regardless of weather, traffic or the need to let cross traffic proceed at intersections.

- ***Mixed-Traffic Conflicts:*** *The planned three-minute headways on the guideway will prevent effective coordination of traffic signals in the delicately balanced signal network in Downtown Honolulu. A three minute cycle of traffic lights would affect traffic flow and capacity of cross-streets. Furthermore, there would be no option to increase the capacity of the rail system by reducing the headway to 90 seconds, which would only exacerbate the signalization problem. An at-grade system would require removal of two or more existing traffic lanes on affected streets. This effect is significant and would exacerbate congestion. Congestion would not be isolated to the streets that cross the at-grade alignment but, instead would spread throughout Downtown. The Final EIS shows that the Project's impact on traffic will be isolated and minimal with elevated rail, and in fact will reduce system-wide traffic delay by 18 percent compared to the No Build Alternative (Table 3-14 in the Final EIS). The elevated guideway will require no removal of existing travel lanes, while providing a reliable travel alternative. When traffic slows, or even stops due to congestion or incidents, the elevated rail transit will continue to operate without delay or interruption.*

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

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

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

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

For the Kapolei future extension, the alignment may continue in the North-South Road median. The extension could either follow the alignment discussed in the Draft EIS, or diverge from North-South Road at any point. The alignment decision would be made as part of a separate environmental evaluation if an extension is proposed and funded for implementation. Impacts will be analyzed at that time, and appropriate mitigation measures will be developed. At the Koko Head end of the Project, the Project has been designed to allow for an extension to climb over the Ala Moana Center parking garage that is immediately beyond the end of the Project. The alignment would follow Kona Street and is anticipated to cross to Kapiolani Boulevard at a point prior to Mahukona Street. The alignment decision would be made as part of a separate environmental evaluation if an extension is proposed for implementation and receives future funding. Impacts will be analyzed at that time, and appropriate mitigation measures will be developed.

Construction of the Project will not preclude future development of the planned extensions. The planned extensions will be evaluated through a separate NEPA and HRS 343 environmental review process. The Indirect Effects, 4.19.2and Cumulative Effects analysis in Section 4.19.3 Cumulative Effects, in this Final EIS has been expanded since the Draft EIS to include a more comprehensive list of the planned and foreseeable development and includes evaluation of the planned extensions. No mitigation for the impacts of the extensions would be provided by the Project. Additional analysis will be undertaken before action is taken on the proposed extensions.

Wetlands and Waters

Coordination with Federal, State, and Local agencies with water resource expertise and responsibilities has been ongoing to provide input and guidance on the resources, design, and construction of the Project. Coordination will continue as appropriate with regulatory agencies throughout final design and construction. Since publication of the Draft EIS, several meetings have been held. On December 9, 2008, the USACE, HDOH, Hawaii's CZM Program, Hawaii Commission on Water Resource Management, and EPA met with project staff to clarify water resource requirements for the Project. As materials were completed to support this section for the Final EIS, follow-up meetings with the EPA were held on March 10, 2009, and July 10, 2009. Meetings were held with the USACE on January 15, February 25, May 13, July 3, and August 10, 2009. Additional coordination between technical staff and the USACE has occurred. Input from these agencies has directed the analysis included in this Final EIS.

USACE guidance permits the use of a preliminary jurisdictional determination (JD) approach to satisfy NEPA requirements. The "preliminary JD" approach is being followed for this Project. Under this approach, areas that are potentially waters of the U.S. are considered to be waters of the U.S. For the purposes of this document, all waters (including intermittent and ephemeral streams) are considered waters of the U.S. if they fit the definitions of tidal, wetland, RPW, or non-RPW waters, unless otherwise stated. The Wetland and Waters of the U.S. Study (RTD 2009b) provides additional information on areas being covered under preliminary JDs which is also documented in Section 4.14 of the Final EIS. The Final EIS also includes an evaluation of impacts to waters of the U.S. to meet the requirement of the Clean Water Act Section 404(b)(1) analysis (See Section 4.14.4 in this Final EIS).

On September 15, 2009, the Army Corps of Engineers stated that its substantive concerns relating to Section 404 of the Clean Waters Act had been addressed and that the scope and intensity of impacts to jurisdictional waters of the United States are now relatively minor due to the extent of avoidance and minimization of impacts on the aquatic environment resulting from project site selection and design. There will be impacts to waters of the U.S by the Project. Transit guideway support columns will be placed in Waiawa, Moanalua, and Nuuanu Streams. In addition, the Project will be widening the existing Dillingham Boulevard Bridge at Kapalama Stream which will require extension of the existing piers and abutments. The total permanent impacts from structural elements of the Project is 0.02 acres. An existing stormwater outfall in Waiawa Springs will be extended at the Pearl Highlands Station to reduce ponding (total impact is 0.06 acres). For all work in waters of the U.S., the City will apply for USACE Section 404 nationwide permits for impacts to waters under the jurisdiction of the Corps where impacts could not be avoided. As discussed in Section 4.18, during construction of the linear transportation features of the Project, it is anticipated that there will also be a temporary effect of up to 0.13 acre of waters of the U.S.

A "functional assessment" was also performed for each location where the Project is adjacent to or crosses waters of the U.S., as identified in the Wetland and Waters of the U.S. Study (RTD 2009b). Given this level of impact to water resources within Honolulu's urban core, the intent of the functional assessment was to analyze impacts of the aquatic ecosystem to develop mitigation concepts for those waters of the U.S. where impacts could not be avoided and only after impacts were minimized to the extent feasible.

Water resource mitigation is being proposed to compensate for the 0.06 acre of permanent encroachment into waters of the U.S from the linear transportation features of the Project and 0.06 acre of impact from other Project elements (culvert improvement at Waiawa Springs). The Project will temporarily impact 0.13 acre in waters of the U.S. during construction. The mitigation measures presented here satisfy the requirements established by 33 CFR 325 and 332, and 40 CFR 230 (Subpart J: Compensatory Mitigation for Losses of Aquatic Resources). These mitigation measures are presented only after measures to fully avoid the water feature have not been possible and only after all measures have been taken to minimize encroachment.

Permanent mitigation features are proposed at Waiawa Stream, within the Pearl Highlands Station. Mitigation proposed for the Waiawa Stream mitigation site may include the following:

- *Enhancement of the stream to restore and/or improve ecological and aquatic function.*
- *Establishment of water quality basins or wetlands.*
- *Enhancement of floodway capacity conveyance to achieve zero rise in flood zone by removal of fill and an increase in stream area.*
- *Relocation of Waiawa Stream to its original location.*
- *Extension of existing culvert to Waiawa Stream to correct existing ponding situation.*
- *Ecological restoration with native Hawaiian plantings and use of non-invasive species.*

Construction phase mitigation measures are discussed in Section 4.18. Mitigation details will be developed during the permitting phase. The City will obtain Section 404 nationwide permits for the Project prior to construction and will comply with the conditions of the Section 404 permit.

Water Quality

Results of the sole source aquifer water quality assessment are included in Section 4.14, Water, in this Final EIS. A Water Quality Impact Assessment for the Project was received by EPA, and they agreed that contamination of the Southern Oahu Basal Aquifer would not occur, based on the construction methods that would be employed and the presence of an upward hydraulic gradient in the study corridor.

DTS is coordinating with Hawaii DBEDT Office of Planning to certify compliance with the Hawaii Coastal Zone Management Program. There is no requirement to have the certification completed before the Final EIS is published. FTA and the Hawaii CZM Program have concurred with DTS's approach.

The discussion of permanent Best Management Practices (BMPs) has been refined in Section 4.14.3, Environmental Consequences and Mitigation [Water], in this Final EIS. Permanent BMPs addressing stormwater runoff and water quality for the park-and-ride lots and the maintenance and storage facility will be prepared during design. The permanent storm water BMPs will be designed, installed, and maintained in accordance with the criteria and guidelines described in the respective authority having jurisdiction's storm water management plan. Types and sizes of permanent storm water BMPs will depend upon the runoff quality and water quality requirements of each receiving water body.

There are minimal hydrological impacts associated with an elevated guideway. The Project creates little new impervious surface, and therefore, there is negligible new stormwater. Groundwater recharge for the water table or caprock aquifer will not be affected as most of the

runoff will be returned to the groundwater system close to where it originates by the permanent BMPs. Permanent BMPs would include vegetated swales, retention ponds, and sediment removal structures and are discussed in Section 4.13.3, Environmental Consequences and Mitigation [Ecosystems], in this Final EIS. Groundwater recharge for the Southern Oahu Basal Aquifer is mostly unaffected since the Project generally overlies the caprock as discussed in the Honolulu High-Capacity Transit Corridor Water Resources Technical Report (RTD 2008k). No increases in sediment transport should occur during the operation of the Project. Mitigation during construction for sediment transport impacts will be detailed in the required NPDES Construction Stormwater permit and will include silt fences, stabilized entrances, covered stockpiles and other standard methods to control stormwater runoff at construction sites.

Since the Project is linear, it traverses several flood zones. As required by floodplain regulations, there will be no rise in the base flood elevations in the flood zones. The hydrological impacts for the future extensions would be studied in separate environmental evaluations should those projects become funded in the future.

Noise Impacts

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

The project design includes an integrated noise-blocking parapet wall at the edge of the guideway structure that extends three feet above the top of the rail. The parapet wall will substantially reduce ground-level noise.

Wheel skirts will increase the benefit from the parapet wall at locations above the elevation of the track. The use of sound-absorptive materials below the tracks in the areas that will experience moderate noise impacts will reduce the Project noise levels from the upper floors to below the impact level. Once the Project is operating, noise levels will be re-measured to confirm that there are no noise impacts from the Project.

Additional noise analyses were performed in the area of Pearl Harbor and the USS Arizona Memorial for the Final EIS. Three additional noise sensitive receptor sites were modeled for noise impacts from the Project. As a result of this analysis, it was determined that there are no noise impacts at these receptors. The results of the noise analysis are presented in Section 4.10.3, Figure 4-55 in this Final EIS.

Environmental Justice

There is no reasonable alternative to avoid impact to the Banana Patch community. An avoidance alternative was evaluated in the Draft EIS to avoid the Solmirin House, which at that time was thought to be a historic property eligible for the NRHP. Since the release of the Draft EIS, the SHPD determined that this property is not eligible. Based on the analysis in Chapter 5 (Section 4(f)) of the Draft EIS, there is no feasible alternative.

DTS has been coordinating with residents of the Banana Patch community since October 2008. Every household has been visited by DTS staff, Right-of-Way staff, and Engineering staff to discuss the Project, special needs, and relocation assistance.

A meeting was held at the Alpha Omega Christian Fellowship Church specifically for this community. Invitations were sent to each Banana Patch community household. At this meeting, a brief presentation was given on the Project and public testimony was recorded by a court reporter. A complete transcript is included in Appendix A in this Final EIS. The transcript of the community meeting held March 2009 is presented in Appendix A, Comments Received on the Draft EIS and Responses, in this Final EIS.

The Project will not result in disproportionately high and adverse impacts within OahuMPO EJ Areas. Therefore, no specific mitigation measures to reduce impacts are warranted. The mitigation measures related to acquisitions, displacements, and relocations are presented in Section 4.4.3, Environmental Consequences and Mitigation, in this Final EIS. The City's right-of-way managers will be working with individual property owners to provide relocation services to all affected business and residential property owners and tenants without discrimination; persons, businesses, or organizations that are displaced as part of the Project would be treated fairly and equitably. The Final EIS provides mitigation measures for property acquisition in accordance with the requirements of the Federal Uniform Relocation Assistance and Real Property Acquisition Policies Act and the USDOT's implementing regulations of 49 CFR Part 24.

Section 4.7.4 in this Final EIS presents a summary of all of the public outreach activities that have been performed. During the public outreach effort for the Project, particular attention has been paid to identifying and reaching low-income and minority populations that are traditionally underserved and underrepresented in the public involvement process. An update to the community outreach activities that have occurred since the publishing of the Draft EIS, including for the Banana Patch community, is also presented in this section of this Final EIS.

Section 106 Consultation

Potential Project impacts to historic resources listed in or eligible for listing in the National Register of Historic Places were evaluated and addressed in the Historic Effects Report: Honolulu High-Capacity Transit Corridor Project (April 2009). This report contains information detailing the methodology used to evaluate these resources. The status of the final determinations of effect is documented in this Final EIS, Section 4.16. As part of these effects determinations, direct, indirect, and cumulative effects were analyzed. To mitigate these adverse effects, a Programmatic Agreement was developed and is included in Appendix H. Impacts from any future extensions will be assessed when the Section 106 process is completed for that work.

Consultation with Section 106 consulting parties will continue for the duration of the Project to accommodate post-Record of Decision discoveries. This consultation will consist primarily of interagency meetings and contacts with individuals and groups. Additional coordination regarding archaeological sampling, surveying, and construction techniques will be

ongoing after the Record of Decision is issued and throughout construction. The stipulations of this consultation are described in the Project's Programmatic Agreement.

Invasive Species

The Project specifications will ensure any construction equipment or material imported to Oahu from the mainland, neighbor islands, or foreign countries, be free of dirt, vegetative matter, and animals. Construction equipment from other parts of the island or other counties will have to be washed before being brought to the Project site. On-site workers will be trained to recognize common invasive species growing in the construction area. Criteria for cleaning, inspection, and treatment of plants that are at risk of harboring pests is part of the Landscape Architecture Design Criteria. Species that can be harmful invaders or contribute to existing problems will not be used for Project plantings. The design criteria includes the American Society of Landscape Architects' Invasive Species List shall serve as a "do not plant" list.

DTS has met with the Oahu Invasive Species Council for this Project. The Oahu Invasive Species Council has provided the Project with specific construction procedures that are presented in Section 4.18.9, in this Final EIS and will be incorporated into construction contract documents.

Hawaii DOT is developing construction standard specifications for Invasive Species Management (Hawaii Chapter of the ASLA Maintenance Specifications Section 665). Once adopted by Hawaii DOT as a standard specification, this Project will comply with it through incorporation into the construction contract documents.

Visual Impacts

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

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

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

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

- *Develop and apply design guidelines that will establish a consistent design framework for the Project with consideration of local context.*
- *Coordinate the project design with City TOD planning and DPP.*
- *Consult with the communities surrounding each station for input on station design elements.*
- *Consider specific sites for landscaping and trees during the final design phase when plans for new plantings will be prepared by a landscape architect. Landscape and streetscape improvements will serve to mitigate potential visual impacts.*

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

Climate Change

The minimum elevation for any Project feature is five feet above sea level; therefore, a rise of up to two feet would not directly affect any Project feature. Any evaluation of indirect effects, such as changes in ridership as a result of residents moving from low-lying areas, would be speculative based on available information.

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

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
Creation Date :	2/4/2009
Creator Affiliation :	
First Name :	Moses
Last Name :	Akana
Business/Organization :	Federal Aviation Administration, Honolulu Control Facility
Address :	760 Worchester Avenue
Alternative Preference :	
Apt./Suite No. :	
City :	Honolulu
State :	HI
Zip Code :	96818
Email :	moses.akana@faa.gov
Telephone :	808.840.6135
Telephone Extension :	
Add to Mailing List :	Both
Submission Method :	Website
Other Submission Method :	
Submission Date :	02/04/2009
Submission Content/Notes :	The height of the platform station along Aolele Street should not alter the flight path of aircraft landing or taking off from Honolulu International Airport. Prior to construction, an aeronautical study must be performed to ensure there is no impact to flight operations.

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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

MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT10/09-337446

Mr. Moses Akana
Honolulu Control Facility
Federal Aviation Administration
760 Worchester Avenue
Honolulu, Hawaii 96818

Dear Mr. Akana:

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

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

The City is coordinating with HDOT Airport Operations and the FAA Honolulu office to ensure the design of the Project is consistent with flight operation requirements for runways 22L/4R and 22R/4L. With the design modifications that were made in coordination with HDOT Airports and the FAA and are included in the Final EIS, the Lagoon Drive Station location and guideway are compliant with the Runway Protection Zone requirements. The City will continue to coordinate with HDOT and FAA to ensure the Project is consistent with the Airport Master Plan and flight operation requirements.

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

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
Creation Date :	12/15/2008
Creator Affiliation :	
First Name :	Jeff
Last Name :	Neely
Business/Organization :	GSA
Address :	450 Golden Gate Avenue (9P)
Alternative Preference :	
Apt./Suite No. :	
City :	San Francisco
State :	CA
Zip Code :	94012
Email :	jeffrey.neely@gs.agov
Telephone :	4155223100
Telephone Extension :	
Add to Mailing List :	Email
Submission Method :	Website
Other Submission Method :	
Submission Date :	12/15/2008
Submission Content/Notes :	I have questions and concerns about the proposed routing, the proximity of the proposed line to the United States Courthouse and the lack of involvement or coordination with my agency.

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, 3RD FLOOR
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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT10/09-336953

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

Dear Mr. Neely:

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

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

Since the publication of the Draft EIS, DTS has coordinated directly with GSA on safety and security concerns at the Federal Courthouse building. GSA has provided documents allowing a more comprehensive determination of security needs. The Project's Safety and Security experts will continue to work with GSA staff on security concerns. Project staff have been working with property management staff from the GSA. We will commit to meet all applicable setback requirements in addition to other security measures as discussed directly with the GSA to safeguard the Department of Justice and other federal staff. We are confident that we can adequately address your concerns without moving the proposed alignment. Section 2.5.4, Safety and Security Measures, of this Final EIS contains additional details on security measures being incorporated into the project.

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

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

U S General Services Administration
Public Buildings Service
PJKK Federal Building
300 Ala Moana Boulevard, Suite 1-338
Honolulu, Hawaii 96850
(808) 541-1950
Fax: (808) 541-3601

December 15, 2008

Wayne Yoshioka, Director
Department of Transportation
City and County of Honolulu
650 S King Street, 3rd Floor
Honolulu, Hawaii 96813

Dear Mr Yoshioka:

The purpose of this letter is to express our concerns over the proposed Honolulu High Capacity Transit Corridor Project

The United States General Services Administration is the record owner of the Prince Jonah Kuhio Kalanianaole Federal Building and Courthouse located at 300 Ala Moana Boulevard ("PJKK Building") We have never received any notice from the City and County of Honolulu Department of Transportation Services Rapid Transit Division (DOT) about this project As such, we were surprised to learn that the proposed project entails the construction and operation of an elevated transit system along a narrow street directly abutting the PJKK Building on Halekawila Street. As a federal agency and property owner significantly impacted by the proposed project, DOT is required to invite us to participate in the scoping process which appears to have occurred in late Dec 2005 and January 2006. Nor have we received any of the multiple notices of intent issued for this project and the draft Environmental Impact Statement. See List of Draft EIS recipients attached to the Draft EIS

We hope that this project has not proceeded so far that any possibility of our providing meaningful comment at this time has been eliminated Our obvious concerns include noise, vibration, security and apparent site easement We are hereby requesting an immediate meeting with DOT in order that we may be briefed as to the proposed project and its particular impact upon the PJKK Building We would caution DOT not to proceed on the basis that that any property necessary for this project (including air rights) along Halekawila can be obtained through the eminent domain process since this process is not available against the United States.

We trust that DOT will immediately correct its notice procedures and now include us on the mailing list for this project and provide all documents prepared and invitations of public meetings for the proposed project to the United States of America. Please note that all information should be sent to the PJKK Building as follows:

Michael D. Larson, Property Manager
Public Buildings Service
US General Services Administration
Prince Kuhio Federal Building & US Courthouse
300 Ala Moana Blvd., Suite 1-336
Honolulu, HI 96850-4992
(808) 541-3632
michael.larson@gsa.gov

We look forward to hearing from you at your earliest convenience. Thank you.

Sincerely,

Michael D. Larson
Property Manager

cc: Carrie Okinaga, Corporation Counsel
Faith Miyamoto, Chief of Transportation Planning
Leslie T. Rogers, Regional Administrator

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, 3RD FLOOR
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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT10/09-292266R

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

Dear Mr. Larson:

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

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

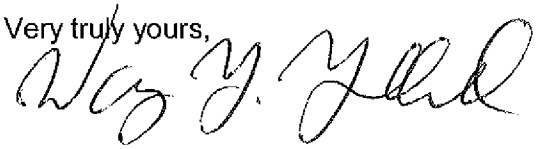
The General Services Administration (GSA) did not receive a scoping notice for the March and April 2007 NEPA scoping period, nor an invitation to be a participating agency because, at that time, the need for use of federal land at the Prince Jonah Kuhio Kalanianaole (PJKK) Federal Building had not been identified. Nor was any other required permit or approval from the GSA identified. The GSA will receive all relevant notices and documents regarding the Project in the future. The DTS met with the GSA and Court staff to determine courthouse security requirements and address security concerns on October 16 and November 10, 2008, and on February 3 and March 31, 2009. In addition, DTS staff will continue to work with the GSA to address safety and security concerns associated with location of the alignment near the PJKK Federal Building. DTS will commit to meet all applicable setback requirements in addition to other security measures as discussed directly with the GSA to safeguard the Department of Justice and other federal staff.

An alignment that avoided Halekauwila Street was evaluated at two stages of the Alternatives Analysis process. This alignment had significant visual impacts, impacts on historic properties, evidence of burials within the vicinity of Queen Street near Kawaiahao Church, impacts on street traffic patterns, and severe engineering constraints, and was not brought forward into the Draft EIS for these reasons. As stated in the Alternatives Screening Memo (Chapter 6), an alignment along Queen Street, rather than Halekauwila Street, had been proposed for screening. Following initial scoping of the alternatives and further engineering analysis, however, it was determined that the Queen Street alignment might not prove to be feasible. As noted in the Alternatives Screening Memo (page 6-3), "The elevated alignment [along Queen Street] would have to pass very near high-rise buildings in some locations. Locating stations within the physical constraints of this alignment is a particular challenge." Both the Queen Street and the Halekauwila Street alignments were advanced to the Alternatives Analysis. While the Halekauwila Street alignment was acknowledged to have the potential for visual impacts on the Aloha Tower, this impact was evaluated in the context of the fact that the Queen Street alignment would have the same impact to Aloha Tower and would have impacts on a number of historical resources. The Queen Street alignment would have significant visual impacts. As noted in the Alternatives Analysis (pages 6-4 to 6-5), "The Queen Street alignment would have somewhat greater negative visual impact because the narrow available right-of-way would require a stacked alignment in the Downtown area and because it would cross between Hale Auhau and the rest of the Hawaii Capital Historic District. The Nimitz Highway/Halekauwila Street/Kapiolani Boulevard alignment would be the best alignment option within Section V." The Capital Historic District is not affected by the Halekauwila alignment. As a result, the Queen Street alignment did not advance from the Alternatives Analysis to the Draft EIS.

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

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

Very truly yours,



WAYNE Y. YOSHIOKA
Director

Enclosure

General Services Administration, Region 9
Public Buildings Service
Hawaii Field Office, San Diego Service Center - 9PDH
300 Ala Moana Blvd, Suite 1-336
Honolulu, HI 96850-0001
Phone (808) 541-1950
Fax (808) 541-3601

February 6, 2009

Wayne Yoshioka, Acting Director
Department of Transportation
City and County of Honolulu
650 S. King Street, 3rd Floor
Honolulu, Hawaii 96813

Dear Mr. Yoshioka:

The purpose of this letter is to bring to your attention the following issues for the Draft Environmental Impact Statement for the Honolulu High-Capacity Transit Corridor Project (the Project) proposed by the Department of Transportation, City and County of Honolulu (DOT). The United States General Services Administration is the owner and property manager of the Prince Jonah Kuhio Kalanianaole Federal Building and Courthouse located at 300 Ala Moana Boulevard ("PJKK Building"). The PJKK Building houses approximately 2,000 federal employees from tenants such as the United States District Courts, Marshals Service, Federal Bureau of Investigation, Secret Service, Drug Enforcement Agency, Coast Guard, Department of Homeland Security, Internal Revenue Service, and Social Security Administration. Further, the PJKK has approximately 500 to 700 public visitors per day.

We understand that DOT is proposing an elevated light rail transportation system which will travel on Halekauwila Street, including a portion of the site of the PJKK Federal Building. On December 15, we wrote to DOT to advise them that GSA, an affected property owner, had not received an invitation to participate in the scoping process. Nor have we received any of the multiple notices of intent issued for this project and the draft Environmental Impact Statement. (A copy of our December 15 letter is attached).

DOT's January 22 response was silent on the absence of required notice. DOT only expressed that GSA should have commented during the alternatives screening held in 2006 without explaining how GSA could have participated since we were never notified of the alternatives screening. The result of this screening process was that DOT decided to place the route on Halekauwila Street requiring the loss of a portion of the site. DOT stated that any changes to the route at this stage would need city council approval thereby implying that opportunity for meaningful comment has been foreclosed which is in direct contravention of the National Environmental Policy Act (NEPA).

DOT's excuse for failure to notify GSA was that there was opportunity to comment on proposed routes prior to the issuance of the Draft EIS. However, the fact that there was a screening process prior to the issuance of the Draft EIS does not relieve the DOT of its legal obligation to notify interested parties of the EIS process.

Further, as stated above, GSA was never notified of the screening process. Also, the fact that the alternatives screenings process was a public process does not meet the notice requirements of NEPA.

The fact that the proposed project is public knowledge provides only information from the government to the citizens and does not allow information to flow from the citizens to the government. *Natural Resources Defense Council v. Morton*, 388 F.Supp. 829 (D.D.C. 1974).

Since GSA is a property owner whose property is proposed for acquisition, GSA is an "interested party" under NEPA. *See Colony Federal Savings and Loan Association*, 482 F.Supp. 296 (W.D. PA 1980). DOT is legally required to notify interested parties of the proposed project. By failing to do so, DOT has precluded GSA from raising environmental issues prior to its selection of Halekauwila as part of the preferred alternative.

We believe that there are important issues critical to DOT's ability to make an informed decision about the Halekauwila Street portion of the route. GSA would have been able to provide DOT information about the possible significant adverse impact of the proposed project. We are very concerned that the presence of an elevated rail transit system in close proximity to the PJKK will create security problems.

In our February 3, 2009 meeting with Faith Miyamoto, Chief of Transportation Planning, and City consultants we discussed some of these security concerns. After the bombing of the federal building in Oklahoma, all federal buildings were classified according to necessary security level. Minimum security standards were established for each security level. Due to high volume public contact and the presence of the US District courts and other agencies, the PJKK Federal Building has been classified at a security level necessitating stringent security requirements. As a result, the PJKK building must be setback to the maximum extent possible from any potential point of explosion. Introduction of the light rail along the Halekauwila Street and/or reducing our current setback will adversely impact the security of the occupants of the PJKK Federal Building and may limit the agencies that can occupy this building.

During this meeting, we also shared other possible impacts and asked for additional information. We were informed that an Ala Moana route had been the preferred alternative for rapid transit in the past, but was ruled out during the current DEIS process primarily because of prior opposition from the federal community. Frankly, we are perplexed that "federal concerns" were cited as the primary reason that the Ala Moana alternative was abandoned, yet we were not consulted during the process of selecting Halekauwila Street as the preferred local alternative. It should have been obvious to DOT that GSA and the federal community would have similar issues on either side of the PJKK Building; and in fact, our concerns are more serious regarding the Halekauwila Street alternative given its more limited set-back.

During our meeting we also discussed serious concerns about the shortfalls in the development and analysis of the City's in-house security evaluation titled, "Potential Threats to Federal Court Building from Transit Viaduct (copy attached). This security evaluation was prepared last year and was not shared with GSA. In fact, we only learned of the existence of this report by second hand sources on February 2, 2009, the day before our meeting. However, we do appreciate DOT's willingness to provide considerable background information regarding the subject report. First, it was confirmed during our meeting that the report was prepared by the City's in-house security staff without any consultation with GSA as the PJKK Building's owner or any federal executive agency tenants such as FBI, DHS, DEA and Secret Service. Second, it was confirmed that the PJKK Building had been inadvertently overlooked as a building with a high risk security rating, and would have otherwise been considered for a compressive and participatory security study similar to those conducted at Pearl

Harbor Navy Yard, Hickam Air Force Base, and Fort Shafter. We were told that DOT acknowledges that a comprehensive security evaluation is in order. Subsequent to our meeting, we received a telephone call from DOT's security consultant, Peter Loverso of Parsons Brinckerhoff, who has requested a kick-off meeting with GSA regarding a security evaluation scheduled for March 31, 2009.

It appears that it is not too late for route changes from a cost standpoint, as evidenced by a recent change approved by the City Council from a routing along Salt Lake Blvd. to an alternative route closer to the Honolulu International Airport. Further, we were informed during the meeting that the alternatives to Halekauwila (Ala Moana and Queen Street) are still considered to be feasible routes from environmental impact, constructability and cost standpoints.

In *Oregon Environmental Council v. Kunzman*, 817 f.2d 484.(9th Cir. 1987), the 9Th Circuit held that the form, content and preparation of an EIS should foster both informed decision-making and informed public participation. Certainly, a security evaluation which accurately assesses the true security risks of the Project on PJKK will provide DOT with the ability to make an informed decision about the proposed route on Halekauwila Street in accordance with NEPA.

In conclusion, we look forward to working with the City DOT and its consultants during the process of a comprehensive and participatory security evaluation of the Halekauwila Street route relative to the PJKK Building. However, there should be no foregone conclusion that mitigation of our security concerns should stop short of a possible route change.

Sincerely,

Michael D. Larson
Property Manager

Attachments: December 15, 2008 Letter to DOT
DOT – Potential Threats to Federal Court Building from Transit Viaduct

Cc: Carrie Okinaga, Corporation Counsel
Faith Miyamoto, Chief of Transportation Planning
Leslie T. Rogers, Regional Administrator

Received by: _____

Date: _____

U. S. General Services Administration
Public Buildings Service
PJKK Federal Building
300 Ala Moana Boulevard, Suite 1-336
Honolulu, Hawaii 96850
(808) 541-1950
Fax: (808) 541-3601

December 15, 2008

Wayne Yoshioka, Director
Department of Transportation
City and County of Honolulu
650 S. King Street, 3rd Floor
Honolulu, Hawaii 96813

Dear Mr. Yoshioka:

The purpose of this letter is to express our concerns over the proposed Honolulu High Capacity Transit Corridor Project.

The United States General Services Administration is the record owner of the Prince Jonah Kuhio Kalanianaole Federal Building and Courthouse located at 300 Ala Moana Boulevard ("PJKK Building"). We have never received any notice from the City and County of Honolulu Department of Transportation Services Rapid Transit Division (DOT) about this project. As such, we were surprised to learn that the proposed project entails the construction and operation of an elevated transit system along a narrow street directly abutting the PJKK Building on Halekawila Street. As a federal agency and property owner significantly impacted by the proposed project, DOT is required to invite us to participate in the scoping process which appears to have occurred in late Dec 2005 and January 2006. Nor have we received any of the multiple notices of intent issued for this project and the draft Environmental Impact Statement. See List of Draft EIS recipients attached to the Draft EIS.

We hope that this project has not proceeded so far that any possibility of our providing meaningful comment at this time has been eliminated. Our obvious concerns include noise, vibration, security and apparent site easement. We are hereby requesting an immediate meeting with DOT in order that we may be briefed as to the proposed project and its particular impact upon the PJKK Building. We would caution DOT not to proceed on the basis that that any property necessary for this project (including air rights) along Halekawila can be obtained through the eminent domain process since this process is not available against the United States.

We trust that DOT will immediately correct its notice procedures and now include us on the mailing list for this project and provide all documents prepared and invitations of public meetings for the proposed project to the United States of America. Please note that all information should be sent to the PJKK Building as follows:

Michael D. Larson, Property Manager
Public Buildings Service
US General Services Administration
Prince Kuhio Federal Building & US Courthouse
300 Ala Moana Blvd., Suite 1-336
Honolulu, HI 96850-4992
(808) 541-3632
michael.larson@gsa.gov

We look forward to hearing from you at your earliest convenience. Thank you.

Sincerely,

Michael D. Larson
Property Manager

cc: Carrie Okinaga, Corporation Counsel
Faith Miyamoto, Chief of Transportation Planning
Leslie T. Rogers, Regional Administrator

Potential Threats to Federal Court Building from Transit Viaduct

The construction of a transit viaduct in close proximity to the court house has been evaluated by security specialists for potential security vulnerabilities. As a result of this evaluation, the possibility of an assault from the viaduct to the court house is deemed to be most improbable for many reasons, including: lack of access to viaduct, easy detection of trespassers, lack of sufficient time to plan an attack, lack of time to carry out an attack, lack of a plausible escape route by a perpetrator, challenge of coordination between train schedules and target availability, and alternatives for accomplishing such an assault which would have significantly less risk of failure.

The evaluation team included a PB Force Protection Specialist with extensive DOD experience, a PB Senior Security Specialist who was a former DHS/TSA executive for Mass Transit and a PB Senior Safety and Security Specialist who was the former DOT/FTA Director of Safety and Security. All of these specialists have conducted numerous vulnerability assessments for transit systems, and maintain high security clearances and liaisons with their prior agencies for current threats, threat trends and security best practices.

Part of the evaluation process was examining similar systems the team is familiar with: the Miami Dade People Mover, Detroit People Mover and Seattle Monorail all travel within close proximity of buildings and in some cases within 50 feet. The Detroit People Mover is adjacent to the federal court house. There have never been any threats or incidents from the People Mover.

The evaluation team contacted the intelligence community regarding this possible threat. Factors considered that would dissuade this type of an assault are: lack the ability of "dry runs", challenged by timing of the target versus train schedules, possibility of being detected (during planning and execution of the attack) and the lack of a good escape method. The team also checked for new or existing current threats that would affect this situation; none were identified.

Significant challenges for anyone attempting an assault from the viaduct include an intrusion detection system protecting entrances to the track area, complemented with CCTVs specifically pointed from platform ends to track area. Trespassers will be detected and a response generated, making it very difficult for a sniper to carry out surveillance or an attack successfully.

Security standards for federal buildings are published by the US General Services Administration. After 9/11, the standards were categorized listed as sensitive security information (SSI) and are no longer available without a specific need to know. The US Protective Services and the US Marshals have access to this information. Judges need to confer with them for any guidance in this matter.

AR00000999

A requirement in the System Safety Management Plan (SSMP) is the development of a Security Plan for the construction phase of the project. The construction contractor will be required to develop the plan and address security issues such as this one. There are a variety of measures that can be implemented, including security fencing to restrict access to the guideway, lighting to aid in detection, intrusion detection systems, and security patrols.

Though the evaluation team found this threat to be most improbable, the following security enhancements for the courthouse can be taken:

- Obscure the direct line of view from the viaduct. Installing a screening wall along the viaduct in the areas of access where there is a direct line of view to the courthouse will reduce opportunities for surveillance of the building and access to areas where a direct fire event could be launched.

- Window glass film/frame anchoring. Attaching a clear or tinted composite film over the window's glass to resist a direct fire or blast overpressure; also, it keeps the glass panel together as a single unit, thus reducing flying glass shards (Kobar Towers). However, window frames require anchoring to the building structure and a horizontal catch bar should be installed on the inside of the window to 'catch' the glass panel if the frame fails, thus, preventing the glass panel from becoming a missile hazard.

- Relocate the Judges Chambers. Relocating the judges' chambers to an area of the building that has limited or no direct line of view and limited entry, multi-level access controls. Remove any public, external, or internal identification, signs, boards, menu's, entrances, etc that list directions or locations to Chambers.

- Tint Chamber windows. Prevent the public from seeing into the Chambers to determine if they are occupied by applying a reflective film over the windows. This may also provide environmental conditioning savings to the building and prevent ultra-violet damage to office property.

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT2/09-298749R

Mr. Michael D. Larson, Property Manager
Public Buildings Service
U.S. General Services Administration, Region 9
Hawaii Field Office, San Diego Service Center – 9PDH
300 Ala Moana Boulevard, Suite 1-336
Honolulu, Hawaii 96850-0001

Dear Mr. Larson:

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

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

Your December 15, 2008 letter is addressed in an individual response letter to the General Service Administration (GSA) that is included in Appendix A to the Final EIS.

The GSA did not receive a scoping notice for the March and April 2007 NEPA scoping period, nor an invitation to be a participating agency because, at that time, the need for use of federal land at the PJKK Federal Building had not been identified. Nor was any other required permit or approval from the GSA identified.

Since the publication of the Draft EIS, DTS has coordinated directly with GSA on safety and security concerns at the Federal Courthouse building. GSA has provided documents allowing a more comprehensive determination of security needs. The Project's Safety and Security experts will continue to work with GSA staff on security concerns. Project staff has been working with property management staff from the GSA. We will commit to meet all applicable setback requirements in addition to other security measures as discussed directly with the GSA to safeguard the Department of Justice and other federal staff. We are confident that we can adequately address your concerns without moving the proposed alignment. Section 2.5.4, Safety and Security Measures, of this Final EIS contains additional details on security measures being incorporated into the project.

An alignment that avoided Halekauwila Street was evaluated at two stages of the Alternatives Analysis process. A Queen Street alignment had significant visual impacts, impacts on historic properties, evidence of burials within the vicinity of Queen Street near Kawaiahao Church, impacts on street traffic patterns, and severe engineering constraints, and was not brought forward into the Draft EIS for these reasons. As stated in the Alternatives Screening Memo (Chapter 6), an alignment along Queen Street, rather than Halekauwila Street, had been proposed for screening. Following initial scoping of the alternatives and further engineering analysis, however, it was determined that the Queen Street alignment might not prove to be feasible. As noted in the Alternatives Screening Memo (Page 6-3), "The elevated alignment [along Queen Street] would have to pass very near high-rise buildings in some locations. Locating stations within the physical constraints of this alignment is a particular challenge." Both the Queen Street and the Halekauwila Street alignments were advanced to the Alternatives Analysis. While the Halekauwila Street alignment was acknowledged to have the potential for visual impacts on the Aloha Tower, this impact was evaluated in the context of the fact that the Queen Street alignment would have the same impact to Aloha Tower and would have impacts on a number of historical resources. The Queen Street alignment would have significant visual impacts. As noted in the Alternatives Analysis (Pages 6-4 to 6-5), "The Queen Street alignment would have somewhat greater negative visual impact because the narrow available right-of-way would require a stacked alignment in the Downtown area and because it would cross between Hale Auhau and the rest of the Hawaii Capital Historic District. The Nimitz Highway/Halekauwila Street/Kapiolani Boulevard alignment would be the best alignment option within Section V." The Capital Historic District is not affected by the Halekauwila alignment. As a result, the Queen Street alignment did not advance from the Alternatives Analysis to the Draft EIS.

Queen Street, King Street, and Beretania Street were previously evaluated during the Alternatives Analysis process for either an elevated or underground alignment and determined to be inferior to Halekauwila Street based on a number of considerations. The effects from a Queen Street alignment are discussed previously in this letter. In addition, Queen Street is narrower than Halekauwila Street. An elevated system on either Beretania Street or King Street would run in front of either the State Capitol or Iolani Palace and would require removal of traffic lanes. The Ala Moana Boulevard to Pohukaina Street alignment was eliminated during the project screening process partially because the alignment would cross a substantial portion of the Federal Building property. The Halekauwila Street alignment is entirely within the City's street right-of-way as it passes in front of the Federal Building. The only encroachment from the Halekauwila Street alignment is to the open area Ewa of the Federal Building.

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

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

State Agencies

AR00001004

27214

HOUSE OF REPRESENTATIVES

STATE OF HAWAII
STATE CAPITOL
HONOLULU, HAWAII 96813

December 12, 2008

The Honorable Wayne Y. Yoshioka
Director, Department of Transportation Services
650 South King Street, 3rd Floor
Honolulu, HI 96813

Comments on Rail Draft Environmental Impact Statement

Dear Wayne,

We are writing to express our support for allowing bicycles and luggage on the Honolulu rail system. Making provision for bicycles and luggage on rail cars will increase ridership of the new system.

The draft EIS indicates (page 3-35) that accommodation for bicycles on rail cars is being contemplated during off-peak hours. We believe allowing bicycles on rail cars only during off-peak hours would be a mistake. As you know, integrating the various modes of transportation is essential to maximizing the benefits of rail. Prohibiting bicycles during rush hour would discourage the use of bicycles as a commuting vehicle. Some commuters may not wish to leave their bicycles at a station due to fears of theft. Others may need the bicycle to complete their commute once off the train. Either way, in a climate where bicycles can be ridden year-round, we should encourage their use not put up barriers to it.

With regard to luggage, whether the airport route or the Salt Lake route is ultimately chosen, we strongly support allowing luggage on the train including suitcases, backpacks, duffel bags and any other hand-carried containers. While there are important advantages to riding the train, there are disadvantages as well. One disadvantage is that a rider can only bring on what he/she can carry. Putting any further limit on luggage discourages ridership.

Some may argue that allowing suitcases poses a security risk, but a suitcase carried to the checkpoint of an airport poses just as great a threat. It could also be argued that a person weighted down with luggage will impede other passengers. While this is true to an extent, it is outweighed by the fact that every person who rides the train will alleviate traffic congestion.

Mahalo for considering our comments.

With warmest aloha,

Representative Karl Rhoads
District 28

Representative Karen Awana
District 44

Representative Joey Manahan
District 29

Representative Blake Oshiro
District 33

Representative Marilyn Lee
District 38

Representative Jon Karamatsu
District 41

cc: Mr. Ted Matley, Federal Transit Administration

AR00001006

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT10/09-336210

The Honorable Karl Rhoads
House of Representatives
Hawaii State Capitol, Room 326
Honolulu, Hawaii 96813

Dear Representative Rhoads:

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

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

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

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

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT10/09-336220

The Honorable Karen Leinani Awana
House of Representatives
Hawaii State Capitol, Room 403
Honolulu, Hawaii 96813

Dear Representative Awana:

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

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

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

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT10/09-336213

The Honorable Joey Manahan
House of Representatives
Hawaii State Capitol, Room 421
Honolulu, Hawaii 96813

Dear Representative Manahan:

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

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

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Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT10/09-336225

The Honorable Blake K. Oshiro
House of Representatives
Hawaii State Capitol, Room 439
Honolulu, Hawaii 96813

Dear Representative Oshiro:

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

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

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

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT10/09-336216

The Honorable Marilyn B. Lee
House of Representatives
Hawaii State Capitol, Room 434
Honolulu, Hawaii 96813

Dear Representative Lee:

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

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

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

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

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT10/09-336236

The Honorable Jon Riki Karamatsu
House of Representatives
Hawaii State Capitol, Room 302
Honolulu, Hawaii 96813

Dear Representative Karamatsu:

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

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WAYNE Y. YOSHIOKA
Director

Enclosure

City and County of Honolulu • State of Hawaii

February 5, 2009

RECEIVED
09 FEB 10 P 2:34
DIRECTOR'S OFFICE
DEPT. OF
TRANSPORTATION SERVICES

Mr. Ted Matley, Community Planner
Federal Transit Administration - Region IX
201 Mission Street, Suite 1650
San Francisco, California 94105

Mr. Wayne Yoshioka, Director
Department of Transportation Services
City and County of Honolulu
650 So. King Street, 3rd Floor
Honolulu, Hawaii 96813

Dear Messrs. Matley and Yoshioka:

Subject: Honolulu High Capacity Transit Corridor Project
City and County of Honolulu Draft EIS 4(f) Evaluation (November 2008)

Thank you for the opportunity to provide comments on the City's high-capacity transit corridor project. We represent the Ala Moana-Sheridan, central Kaka'ako and McCully communities whose residents and small businesses are located within a 7-block radius of the Honolulu High-Capacity Transit Corridor project route between Halekauwila to Kona Street.

With respect to the central Kaka'ako and Ala Moana-Sheridan neighborhoods most directly impacted by the HHCTCP route, we have the following concerns regarding displacement of existing businesses and older residents, as well as further congestion of heavily-trafficked thoroughfares:

Transit Impacts upon Central Kaka'ako business district
In 2006, the Kaka'ako mauka portion of Kaka'ako included 1,479 businesses with 16,931 employees (representing 3.7% of Honolulu's non-agriculture workers), and generating $2.02 billion in annual sales.

Of this amount, central Kaka'ako businesses in 2007 employed about 1,971 people and generated estimated sales of $259 million dollars (source: *Final Report and Quarterly Report No. 4 for Contract entitled "Transit Oriented Community-based Development Project", Honolulu City Council, March 2008*).

1. Central Kaka'ako transit right-of-way acquisitions: The City's HHCTCP DEIS identifies nine private properties for acquisition in their entirety, with an

estimated 20 small businesses that generate at least $14.4 million in annual income being directly displaced. An additional 28 properties (with roughly 30 small businesses) are proposed for partial acquisition (*source: HHCTCP DEIS, Appendix B, November 2008*), with various properties subject to loss of on-street parking, business visibility and aesthetics due to transit columns. Central Kaka'ako service businesses are especially vulnerable to transit displacement because they are subject to multiple layers of regulation – rapidly-escalating property taxes imposed by the City & County of Honolulu, combined with zoning/property assessments designed for larger landholdings imposed by the Hawaii Community Development Authority. The nature of small businesses also means that their needs and unique requirements cannot readily be addressed by a one-size-fits-all approach.

Of the remaining 54 partial acquisitions and 15 full acquisitions of house numbers (portions within a single TMK parcel) identified by the HHCTCP DEIS for the central Kaka'ako route, a large number of home owners and residents in the area will be displaced as a result of the current alignment.

2. Mitigation measures for businesses and residents displaced or impacted by transit route alignments in central Kaka'ako: Section 4-42 of the DEIS, covering impacts of the HHCTCP route upon neighborhoods, glosses over the likely impacts in the Ala Moana-Kaka'ako region through this observation:

   "[t]he transition between...[Downtown] and Ala Moana Center would require acquisitions and displacements...Because Kaka'ako has been designated a redevelopment area, changes in land uses to transit-oriented development is likely, ***which may result in a change in character along the alignment, especially near stations (emphasis added)."***

   With a total of 82 partial acquisitions and 24 full acquisitions in this area alone, the HHCTCP discussion of mitigation measures and ways to address the needs of those being displaced is woefully inadequate.

We believe the following questions, which are not addressed in the HHCTCP DEIS document, must be addressed by the City & County of Honolulu for heavily-impacted neighborhoods like Ala Moana-Kaka'ako:

- What steps has the City & County of Honolulu taken in notifying property owners, residents and businesses of their likely displacement (through full and partial property acquisitions), and what assistance has been offered to property owners, residents and businesses to compensate for their losses?

- What kinds of displacement assistance and/or relocation assistance, financial aid or tax relief will property owners, residents and businesses be provided in order to address business disruption/termination? What is

the City & County of Honolulu's timeline for notifying affected property owners, residents and businesses and offering assistance with relocation, financial aid or tax relief?

- What steps will the City & County of Honolulu take to help maintain service businesses in central Kaka'ako, especially where those businesses' strategic location near major employment centers (Downtown, Civic Center, Makiki, Ala Moana and Waikiki) equals over $250 million in annual sales?

  For example, central Kaka'ako houses over 25% of Honolulu's auto repair, mechanical repair/auto body and repainting businesses, as well as a substantial number of businesses providing wholesale and direct service support to Waikiki, Ala Moana hotels, restaurants and retail outlets. Where will residents, employees in urban Honolulu and Ala Moana/Waikiki businesses have to go to obtain these services?

- What actions will the City & County of Honolulu take to address displacement of property owners and residents on fixed incomes or with limited means? What programs will the City & County of Honolulu provide to assist senior citizens and elderly property owners with relocation financing, alternative housing and transit assistance as development of TODs "of a different character" emerge in their neighborhoods?

Transit Impacts upon the Ala Moana/Sheridan community

In its cursory observation of the impacts that the proposed transit route will have upon the Ala Moana/Kaka'ako area cited in Section 4-42 of the DEIS, the HHCTCP DEIS fails to incorporate recommendations from community planning and traffic studies conducted over the past decade for this area.

For example, the City & County of Honolulu's Ala Moana-Sheridan Draft Community Plan (*Department of Planning and Permitting, 2006*) and Transit Oriented Community-based Development Project, Phase I Report (*Honolulu City Council, March 2008*) have characterized this area as one with a rapidly-growing percentage of elderly residents – 65-and older residents comprise 20% of today's population, and the number is increasing.

Recognizing the high percentage of elderly residents in the Ala Moana and Kaka'ako area, the Ala Moana-Sheridan Draft Community Plan recommended a series of changes to improve pedestrian safety in the Kapiolani corridor (e.g., Kapiolani/Keeaumoku, Kapiolani/Atkinson Drive, Atkinson/Ala Moana Boulevard).

It also identified the Kapiolani/Keeaumoku intersection as one of the most dangerous intersections in Honolulu. It sought to reduce the level of through-traffic through Sheridan streets by proposing that Piikoi Street and Pensacola

Street be changed from one-way streets to two-way streets that utilized a landscaped median to provide a means for pedestrians and bicyclists to safely cross these two multi-lane streets.

We believe that the following should also be addressed as part of the HHCTCP DEIS mitigation measures for the Ala Moana/Kaka'ako community:

- What steps will the City & County of Honolulu take to address the existing level of high traffic volume along the Kapiolani corridor and use transit station locations and services along its mass transit route to provide a safer transit travel alternative for elderly residents?

- What steps will the City & County of Honolulu take to reduce pedestrian safety hazards in the Kapiolani/Keeaumoku intersection, especially with respect to the elevated transit station planned for the Ala Moana Center at Nordstrom's?

- What design alternatives is the City & County of Honolulu evaluating to make it safe and easy for elderly, immigrant and very young transit-riders and pedestrians to navigate between the elevated transit station and street-level buses departing/arriving at Ala Moana Center?

- What alternatives has the City & County of Honolulu considered in identifying the best solutions for separating pedestrian traffic from vehicular traffic in the Kapiolani corridor? For example, has the City & County of Honolulu considered construction of a pedestrian overpass between the Ala Moana Center transit station at Nordstrom's and mauka side of Kapiolani Boulevard?

- What steps has the City & County of Honolulu taken to evaluate pedestrian-friendly alternatives for mauka-makai traffic in the Kapiolani corridor (e.g., Kalakaua, Atkinson, Keeaumoku, Piikoi, Pensacola, Ward), such as modifying the one-way directions for Piikoi/Pensacola Streets into two-way streets?

- What alternatives has the City & County of Honolulu considered in identifying the best means of enhancing the use of NBC Exhibition Hall and Arena and its existing parking facilities with close proximity to a mass transit station?

We strongly endorse the benefits that can accrue to our neighborhoods as a result of transit development; and seek to work proactively with our city and federal partners. Although the draft EIS has not addressed some of these issues in sufficient detail to provide appropriate mitigation, we are confident these issues can be dealt with in the months ahead as we complete our review of the Final EIS.

We look forward to working with the City & County in addressing these concerns during this important year for transit planning and community development.

Sincerely,

Senator Carol Fukunaga
District 11
Makiki/Tantalus, Ala Moana, McCully

Senator Brickwood Galuteria
District 12
Iwilei, Chinatown,
Downtown, Kakaako, Ala Moana,
Waikiki

Representative Tom Brower
District 23
Waikiki, Ala Moana

Representative Karl Rhoads
District 28
Palama, Chinatown, Downtown,
Lower Makiki, Sheridan

Councilmember Duke Bainum
District 5
Manoa, Palolo, Makiki, McCully/Moiliili,
St. Louis, Kapahulu, Kaimuki

cc: Congressman Neil Abercrombie, District 1
Congresswoman Mazie Hirono, District 2

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SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT2/09-299621R

The Honorable Carol Fukunaga
The Senate
Hawaii State Capitol, Room 216
Honolulu, Hawaii 96813

Dear Senator Fukunaga:

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

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Central Kakaako Business District

Regarding your comments on the Central Kakaako District, DTS has considered the complexities and interdependencies of the Kakaako district. Overall the Project is expected to strengthen the district's function as an employment center. The Project also could bring in new customers for businesses and services because of the increased mobility and access the new transit mode will provide to a wider region.

According to Appendix C of the Final EIS, there will be 28 partial acquisitions and 6 full acquisitions, resulting in 18 business displacements between Bishop Street and Ala Moana Center. Of these displacements, 11 will occur along the alignment between South Street and

Kamakee Street. In addition, 12 of the 28 partial acquisitions will occur between South Street and Kamakee Street, but these acquisitions are not expected to displace any businesses. There are not any residential displacements in this area of the corridor.

Acquisitions, displacements, and relocations will be addressed on a case-by-case basis as discussed in Section 4.4 of the Final EIS, and property that will be directly affected by the Project will be purchased at market rates. As stated in Section 4.4.3 of the Final EIS, "... compensation will be provided to affected property owners, businesses, or residents in compliance with all applicable Federal and State laws and will follow the Federal Uniform Relocation Assistance and Real Property Acquisition Policies Act (49 CFR 24)." Specific mitigation measures are listed in Section 4.4 of the Final EIS.

Your bulleted points are addressed separately below.

- *Owners of properties where an acquisition is required have all been individually contacted to discuss right-of-way options. Those from whom property is to be acquired will be treated according to the requirements of the Federal Uniform Relocation Assistance and Real Property Acquisition Policies Act. It provides for purchase at fair market value and includes relocation assistance to those affected. The Act requires that those in need of relocation be placed in comparable quarters for living or for business. It should be noted that because of the design of the system, it impacts fewer properties compared to other projects of this size and requires full acquisition of only 33 properties throughout the entire alignment, as indicated in Section 4.4 of the Final EIS.*

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- *Section 4.18 of the Final EIS discusses the temporary and limited construction effects of the Project. Coordination will occur with all businesses and residents adjacent to the study corridor who may be affected by construction regarding business and home-life activities that need to be maintained during construction. Details are available in Section 4.18.1 of the Final EIS, which includes proposed mitigation.*

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Ala Moana/Sheridan Community

To address your comments on the Ala Moana/Sheridan communities, the analysis conducted for the Draft and Final EISs considered the committed transportation projects that are identified in the Oahu Regional Transportation Plan (OahuMPO 2007). Congestion-relief projects are described in Table 2-3 of the Final EIS. Projects not related to the transit project are not addressed in the Draft and Final EISs.

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- *The Project provides a safe, reliable high-speed transit system that will reduce traffic volume and delay in the study corridor compared with the No Build Alternative in 2030. Near stations, however, there could be additional traffic caused by vehicles (buses, cars, taxis, etc.) trying to access the stations. Traffic analysis conducted for the EIS found that the Project will not affect Kapiolani Boulevard, and therefore the Project does not propose any changes to Kapiolani Boulevard. DTS is working with appropriate State and City agencies to prioritize improvements to pedestrian and bicycle facilities and to encourage construction of safe and convenient connections to the rail stations.*

- *All transit stations will be fully accessible and comply with the Americans with Disabilities Act (ADA) and other relevant regulations. Stations are being designed to allow safe and convenient access to adjacent areas. There are no proposed changes to Kapiolani Boulevard or the intersection of Kapiolani Boulevard and Keeaumoku Street as part of the Project. However, as discussed above, DTS is working with appropriate State and City agencies to prioritize improvements to pedestrian and bicycle facilities near rail stations.*

- *Facilities at all guideway stations will be designed in a manner that accommodates persons with disabilities consistent with ADA requirements. Each station will have escalators and elevators to allow access between platforms and the street. The majority of transit passengers will be familiar with the process of entering and using the system. However, by using identical or similar station access as well as concourse and platform configurations, all passengers, regular users, newcomers, tourists, the elderly, and persons with disabilities will find the system user-friendly and inviting.*

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- *Pedestrian planning along those roadways is outside the focus of the Project.*

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT2/09-299621R

The Honorable Brickwood Galuteria
The Senate
Hawaii State Capitol, Room 208
Honolulu, Hawaii 96813

Dear Senator Galuteria:

Subject: Honolulu High-Capacity Transit Corridor Project
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Director

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
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SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT2/09-299621R

The Honorable Tom Brower
House of Representatives
Hawaii State Capitol, Room 326
Honolulu, Hawaii 96813

Dear Representative Brower:

Subject: Honolulu High-Capacity Transit Corridor Project
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Regarding your comments on the Central Kakaako District, DTS has considered the complexities and interdependencies of the Kakaako district. Overall the Project is expected to strengthen the district's function as an employment center. The Project also could bring in new customers for businesses and services because of the increased mobility and access the new transit mode will provide to a wider region.

According to Appendix C of the Final EIS, there will be 28 partial acquisitions and 6 full acquisitions, resulting in 18 business displacements between Bishop Street and Ala Moana Center. Of these displacements, 11 will occur along the alignment between South Street and

Kamakee Street. In addition, 12 of the 28 partial acquisitions will occur between South Street and Kamakee Street, but these acquisitions are not expected to displace any businesses. There are not any residential displacements in this area of the corridor.

Acquisitions, displacements, and relocations will be addressed on a case-by-case basis as discussed in Section 4.4 of the Final EIS, and property that will be directly affected by the Project will be purchased at market rates. As stated in Section 4.4.3 of the Final EIS, "... compensation will be provided to affected property owners, businesses, or residents in compliance with all applicable Federal and State laws and will follow the Federal Uniform Relocation Assistance and Real Property Acquisition Policies Act (49 CFR 24)." Specific mitigation measures are listed in Section 4.4 of the Final EIS.

Your bulleted points are addressed separately below.

- *Owners of properties where an acquisition is required have all been individually contacted to discuss right-of-way options. Those from whom property is to be acquired will be treated according to the requirements of the Federal Uniform Relocation Assistance and Real Property Acquisition Policies Act. It provides for purchase at fair market value and includes relocation assistance to those affected. The Act requires that those in need of relocation be placed in comparable quarters for living or for business. It should be noted that because of the design of the system, it impacts fewer properties compared to other projects of this size and requires full acquisition of only 33 properties throughout the entire alignment, as indicated in Section 4.4 of the Final EIS.*

- *As stated in Section 4.4.3 of the Final EIS, "... compensation will be provided to affected property owners, businesses, or residents in compliance with all applicable Federal and State laws and will follow the Federal Uniform Relocation Assistance and Real Property Acquisition Policies Act (49 CFR 24)." As stated previously, owners of properties where an acquisition is required have all been individually contacted to discuss right-of-way options.*

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- *Section 4.18 of the Final EIS discusses the temporary and limited construction effects of the Project. Coordination will occur with all businesses and residents adjacent to the study corridor who may be affected by construction regarding business and home-life activities that need to be maintained during construction. Details are available in Section 4.18.1 of the Final EIS, which includes proposed mitigation.*

As stated in Section 4.4.3 of the Final EIS, "... compensation will be provided to affected property owners, businesses, or residents in compliance with all applicable Federal and State laws and will follow the Federal Uniform Relocation Assistance and Real Property Acquisition Policies Act (49 CFR 24)."

Ala Moana/Sheridan Community

To address your comments on the Ala Moana/Sheridan communities, the analysis conducted for the Draft and Final EISs considered the committed transportation projects that are identified in the Oahu Regional Transportation Plan (OahuMPO 2007). Congestion-relief projects are described in Table 2-3 of the Final EIS. Projects not related to the transit project are not addressed in the Draft and Final EISs.

Your bulleted points are addressed separately below.

- *The Project provides a safe, reliable high-speed transit system that will reduce traffic volume and delay in the study corridor compared with the No Build Alternative in 2030. Near stations, however, there could be additional traffic caused by vehicles (buses, cars, taxis, etc.) trying to access the stations. Traffic analysis conducted for the EIS found that the Project will not affect Kapiolani Boulevard, and therefore the Project does not propose any changes to Kapiolani Boulevard. DTS is working with appropriate State and City agencies to prioritize improvements to pedestrian and bicycle facilities and to encourage construction of safe and convenient connections to the rail stations.*

- *All transit stations will be fully accessible and comply with the Americans with Disabilities Act (ADA) and other relevant regulations. Stations are being designed to allow safe and convenient access to adjacent areas. There are no proposed changes to Kapiolani Boulevard or the intersection of Kapiolani Boulevard and Keeaumoku Street as part of the Project. However, as discussed above, DTS is working with appropriate State and City agencies to prioritize improvements to pedestrian and bicycle facilities near rail stations.*

- *Facilities at all guideway stations will be designed in a manner that accommodates persons with disabilities consistent with ADA requirements. Each station will have escalators and elevators to allow access between platforms and the street. The majority of transit passengers will be familiar with the process of entering and using the system. However, by using identical or similar station access as well as concourse and platform configurations, all passengers, regular users, newcomers, tourists, the elderly, and persons with disabilities will find the system user-friendly and inviting.*

- *Pedestrians will use the existing network of sidewalks in the Kapiolani corridor. A pedestrian overpass at this location is not proposed as part of the Project, but the Project does not preclude future projects such as this by others.*

- *Pedestrian planning along those roadways is outside the focus of the Project.*

- *Use of the Neal Blaisdell Center for station area parking is not being considered as part of the Project. However, as stated in Section 3.4.7 of the Final EIS, the approach to mitigating the effects of spillover parking will be unique to each station area. The City will conduct surveys to determine the extent of spillover parking near stations and implement one or more mitigation strategies as needed. Strategies to be considered include, but are not limited to, parking restrictions (where parking causes safety or congestion problems) and shared parking arrangements (at locations where parking is available but dedicated to another purpose, such as retail centers, office uses, or places of worship). Implemented strategies will be monitored, and necessary adjustments will be made as needed.*

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

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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

MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT2/09-299621R

The Honorable Karl Rhoads
House of Representatives
Hawaii State Capitol, Room 326
Honolulu, Hawaii 96813

Dear Representative Rhoads:

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

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

Central Kakaako Business District

Regarding your comments on the Central Kakaako District, DTS has considered the complexities and interdependencies of the Kakaako district. Overall the Project is expected to strengthen the district's function as an employment center. The Project also could bring in new customers for businesses and services because of the increased mobility and access the new transit mode will provide to a wider region.

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Your bulleted points are addressed separately below.

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

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
Creation Date :	1/6/2009
Creator Affiliation :	
First Name :	K. Mark
Last Name :	Takai
Business/Organization :	State House
Address :	State Capitol
Alternative Preference :	
Apt./Suite No. :	
City :	Honolulu
State :	HI
Zip Code :	96813
Email :	reptakai@capitol.hawaii.gov
Telephone :	8085868455
Telephone Extension :	
Add to Mailing List :	None
Submission Method :	Website
Other Submission Method :	
Submission Date :	01/06/2009

Submission Content/Notes : January 5, 2009

The Honorable Wayne Yoshioka
City Department of Transportation Services
650 South King Street, 3rd Floor
Honolulu, Hawaii 96813

Dear Director Yoshioka:

The Kamehameha Highway Improvements Project Task Force is a group of elected officials, business leaders, and community groups that have a common goal to make traffic, safety and aesthetic improvements to the highway while still maintaining a sense of culture and place. The project focuses on the highway from Waihona Street (Sam's Club in Pearl City) to Center Drive (Pearl Harbor Naval Base).

This group began formally meeting since February 2005 after the State Legislature appropriated an initial $1.2 million for this effort. Since our initial meeting, we have continued to meet quarterly to discuss our plans for the corridor and identify short-, mid- and long-term projects that will improve and enhance this stretch of the highway.

At our December 10, 2008 meeting, a presentation was made on the Honolulu High-Capacity Transit Corridor Project. We learned that the rail project would utilize the median of Kamehameha Highway through the Aiea-Pearl City area.

While we continue to support the City's effort to provide reliable and effective mass transportation options to meet our City's growing needs, we are wary of becoming merely a corridor for travel for non-residents of Aiea-Pearl City. For example, we are quite concerned about the impacts that a visually-intrusive viaduct may have on our plans to improve the aesthetics of the area, our sense of community pride, and our community's cohesiveness.

At the December 10 meeting, the Task Force reached a consensus on several issues that we would like you, Mayor Mufi Hannemann, your Transit Team, and the City Council to carefully consider when evaluating the mass transit options. The issues the Task Force would like you to consider are:

• We request that remaining overhead utility lines on both the mauka and makai sides of the corridor (such as the mammoth 138 kV lines) be incorporated into
the transit viaduct structure. The removal of these massive overhead power lines would help mitigate the further visual degradation that would result from the transit viaduct. Using the transit viaduct to carry all overhead utility lines may provide some aesthetic mitigation at a cost far cheaper than undergrounding the overhead utilities.

• Placement of the transit viaduct down the median of Kamehameha

Highway through our community should be accompanied by meaningful beautification improvements at grade within the median. A cohesive median beautification program would help mitigate the visual intrusion of the viaduct while fostering community pride and cohesiveness.

Attached please find a list of the Kamehameha Highway Improvements Task Force membership. Those members who were present at the December 10, 2008 Task Force meeting are noted. Thank you for considering this input.

With warmest aloha,

Representative K. Mark Takai
Co-Chair, Kamehameha Hwy Improvements Task Force

cc: Mayor Mufi Hannemann
/Attachment

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, 3RD FLOOR
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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT1/09-295442

The Honorable K. Mark Takai
House of Representatives
State Capitol, Room 305
Honolulu, Hawaii 96813

Dear Representative Takai:

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

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

Visual effects along the Kamehameha Highway are discussed under the "Fort Weaver Road to Aloha Stadium Landscape Unit" and the "Aloha Stadium to Kalihi Landscape Unit" in Section 4.8.3 of the Final EIS. The Project will be set in an urban context where visual change is expected and differences in scales of structures are typical. Noticeable changes to views will occur where the Project elements will be near existing views or in the foreground of these views. Viewpoints not located near the alignment or stations will generally be less affected by changes in the visual environment because they will take in a longer, more expansive landscape. Medians will be landscaped where appropriate to soften the effect of the guideway and create an attractive environment along the alignment.

The assessment of visual effect due to the Project as described in Section 4.8.3 of the Final EIS considers changes to the visual landscape and viewer responses to those changes. This includes the existing development along the Project alignment. Within the Project corridor

the environment changes from rural at the Wai'anae end of the corridor to dense high-rise development at the Koko Head end.

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

Other measures to address visual impacts of the Project are being developed through the station design and planning process. The initial station area plans and design guidelines were first developed with coordination between DTS and the Department of Planning and Permitting (DPP). The next level of transit station design focuses on integrating individual neighborhood characteristics of the communities served by the stations. The following mitigation framework will be included in the Project to minimize negative visual effects and enhance the visual and aesthetic opportunities that it creates:

- *Develop and apply design guidelines that will establish a consistent design framework for the Project with consideration of local context.*
- *Coordinate the project design with City TOD planning and DPP.*
- *Consult with the communities surrounding each station for input on station design elements.*
- *Consider specific sites for landscaping and trees during the final design phase when plans for new plantings will be prepared by a landscape architect. Landscape and streetscape improvements will serve to mitigate potential visual impacts.*

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

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

To address your first concern, current plans do not include incorporating utility lines into the transit structure. In addition, to address your second concern, current plans show the Project placed in the median of Kamehameha Highway.

As stated in the discussion of mitigation in Section 4.8 of the Final EIS, DTS has developed specifications and Design Criteria to address the City's requirements for the Project. Landscaping and streetscape improvements will mitigate potential visual impacts. Existing trees will be retained where practical and some new vegetation will be provided. DTS will continue to consult with communities surrounding each station for input on station design elements.

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

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

HOUSE OF REPRESENTATIVES

STATE OF HAWAII
STATE CAPITOL
HONOLULU, HAWAII 96813

Representative James Kunane Tokioka
415 S. Beretania Street Rm. 322
Honolulu, Hawaii 96813

December 16th, 2008

Mr. Wayne Yoshioka, Director
Department of Transportation Services
City and County of Honolulu
650 South King Street, 3rd Floor
Honolulu, Hawai'i 96813

RECEIVED
2008 DEC 18 P 3:40

RE: HNL High-Capacity Corridor Project Draft Environmental Impact Statement/Section 4(f) Evaluation

Dear Director Yoshioka,

Thank you for the copy of the draft Environmental Impact Statement on the Honolulu High-Capacity Transit Corridor Project. Upon review I would like to offer the following comment:

As an outer-island legislator, myself and residents from neighboring counties are forced to pay the GET while visiting Oahu. If the City is using the GET tax to fund this project it would only be fair to include a route to the airport so that our outer-island residents can also enjoy the benefits of a transportation system that they helped fund.

Thank you for the opportunity to comment on this project. If you need further information, please contact me at 808-586-6270, or by email at reptokioka@capitol.hawaii.gov.

Sincerely,

James Kunane Tokioka
District 15, State Representative

c: Mr. Ted Matley
OEQC

Representative James Kunane Tokioka
State Capitol, Room 322 • Honolulu, HI 96813
Phone: (808) 586-6270 • Fax: (808) 586-6271
Email: reptokioka@capitol.hawaii.gov

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT10/09-336209

The Honorable James Kunane Tokioka
House of Representatives
State Capitol, Room 322
Honolulu, Hawaii 96813

Dear Representative Tokioka:

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

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

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

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

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

LINDA LINGLE
GOVERNOR

RUSS K. SAITO
COMPTROLLER

BARBARA A. ANNIS
DEPUTY COMPTROLLER

(P)1388.8

STATE OF HAWAII
DEPARTMENT OF ACCOUNTING AND GENERAL SERVICES
P.O. BOX 119, HONOLULU, HAWAII 96810

DEC 18 2008

RECEIVED
08 DEC 19 P 3:20
DIRECTOR'S OFFICE
TRANSPORTATION SERVICES

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

Dear Mr. Yoshioka:

Subject: Honolulu High-Capacity Transit Corridor Project
Draft Environmental Impact Statement (DEIS) / Section 4(f) Evaluation

Thank you for your letters of November 12 and November 25, 2008. The Department of Accounting and General Services remains prepared to work with the Department of Transportation Services but questions the *de minimus* determination you made with regard to the Aloha Stadium (Table 5-1, Pages 5-4, 5-10). Your project, including the park-and-ride, will take approximately 6.2 acres of our Aloha Stadium site. This diminishes our use of the site as a recreation facility, particularly the loss of parking during events. The new offsite park-and-ride parking connected to the Aloha Stadium by this project may not compensate for our on-site parking loss. As a reminder, comments in our September 8, 2008 letter still apply, especially Items 1 thru 5. (See attachment or Pages 95-96 of Appendix D of this DEIS).

If you have any questions, please call me at 586-0400 or have your staff call Mr. Bruce Bennett of the Public Works Division at 586-0491.

Sincerely,

RUSS K. SAITO
State Comptroller

Attachment
c: Ms. Katherine Puana Kealoha, Esq. DOH-OEQC
Mr. Ted Matley, FTA Region IX
Mr. Scott Chan, Aloha Stadium Manager

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT12/08-293027R

Honorable Russ K. Saito, State Comptroller
Department of Accounting and General Services
State of Hawaii
P.O. Box 119
Honolulu, Hawaii 96810

Dear Mr. Saito:

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

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

DTS has met with the Aloha Stadium Manager and the Department of Accounting and General Services since the selection of the Airport Alignment as the preferred alternative. DTS reviewed the impacts of the Project, and the Department of Accounting and General Services has been consulted regarding a de minimis determination.

Potential project impacts to listed and eligible historic properties were evaluated and addressed in the Honolulu High-Capacity Transit Corridor Project Historic Effects Report (RTD 2009). This report contains information detailing the methodology used to evaluate these resources. The State Historic Preservation Division (SHPD) has concurred with the majority of effect determinations and the Project team agreed to accept additional adverse effect

determinations based on the SHPD's analysis. Final determinations of effect are presented in this Final EIS, Section 4.16.

The Project follows Kamehameha Highway on the Airport alignment and does not affect Aloha Stadium parking as substantially as the Salt Lake alignment, considered in the Draft EIS. Only three parking spaces in the main parking lot will be affected by the Airport Alternative, where columns need to be placed to support the guideway. The Project will pave and stripe the existing gravel overflow lot to accommodate a park-and-ride facility to be used by commuters on weekdays and available for use by Stadium attendees at any time. . Improved access provided by the fixed guideway station and bus transit center will reduce parking demand. Thus, a multi-level parking structure at Aloha Stadium is not necessary to mitigate Project impacts. Coordination with the Aloha Stadium Manager and the Department of Accounting and General Services to minimize the permanent loss of parking has occurred and will continue during final design.

The City has identified the Airport Alternative as the Preferred Alternative. This selection was based on consideration of the benefits of each alternative, public input on the Draft EIS, and City Council Resolution 08-261 identifying the Airport Alternative. The selection is described in Chapter 2 in this Final EIS.

As indicated in Section 3.5.7, in this Final EIS, a Maintenance of Traffic (MOT) Plan and Transit Mitigation Program will identify measures to mitigate temporary construction related effects on transportation. The MOT Plan will address effects on streets and highways, businesses and residences, and pedestrians and bicyclists for each construction phase. Construction activity at Aloha Stadium will be focused primarily on the overflow parking lot area, for construction of the station, bus transit center and resurfacing of the parking lot. There will also be temporary construction activity in the main parking lot, adjacent to Kamehameha Highway as columns are erected to support the guideway. Construction will not directly affect Stadium activities, and access to the Stadium will be available during construction.

There will be no direct connection from the fixed guideway station to the Stadium or primary Stadium parking lot. Stadium patrons will cross Salt Lake Boulevard at-grade using the existing crosswalk to reach the station entrance. Stations entrances will be securable from the station. DTS has coordinated with the Aloha Stadium Manager and Department of Accounting and General Services with regard to station features. Safety and security are discussed in this Final EIS.

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

The project design includes an integrated noise-blocking parapet wall at the edge of the guideway structure that extends three feet above the top of the rail. The parapet wall will substantially reduce ground-level noise. Wheel skirts will increase the benefit from the parapet wall at locations above the elevation of the track. The use of sound-absorptive materials below

the tracks in the areas that will experience moderate noise impacts will reduce the Project noise levels from the upper floors to below the impact level. Once the Project is operating, noise levels will be re-measured to confirm that there are no noise impacts from the Project.

Noise during construction is discussed in Section 4.18.5, Noise and Vibration [Construction Phase Effects] in this Final EIS.

Future traffic conditions in the Aloha Stadium area were analyzed in the Draft EIS, both with and without the Project. Analysis revealed that the Project would not have an effect on future traffic conditions in that location. Therefore, no major changes to traffic patterns are proposed.

The proposed traction power substation, shown on Figure 2-10, Fixed Guideway Transit Alternative Features, Aloha Stadium to Kalihi, in the Final EIS, is on a parcel (TMK 1-5-8:9) owned by the City and County of Honolulu. The proposed traction power substation will not impact the Liliha Civic Center property.

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

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

LINDA LINGLE
Governor

SANDRA LEE KUNIMOTO
Chairperson, Board of Agriculture

DUANE K. OKAMOTO
Deputy to the Chairperson

State of Hawaii
DEPARTMENT OF AGRICULTURE
1428 South King Street
Honolulu, Hawaii 96814-2512

February 3, 2009

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

Dear Mr. Yoshioka:

Subject: Draft Environmental Impact Statement/Section 4(f) Evaluation and Supplemental Information

The Department of Agriculture has reviewed the subject draft environmental impact statement (DEIS) and offers the following comments that are limited to the East Kapolei – Pearl City Highlands segment.

The Honolulu High-Capacity Transit Corridor Project (Project) right-of-way and proposed maintenance facility will use approximately 88 acres of "Prime" and "Other Important" agricultural land, of which approximately 70 acres are actively cultivated (Chapter 4, pages 4-19, -20). The DEIS states that pursuant to the Ewa Development Plan, the larger agricultural area situated on both sides of the Project right-of-way is to be eventually developed into urban uses (see Figure 4-3, Chapter 4, page 4-15). The entire Ewa plain makai of the H-1 Freeway, including the Project, adjacent planned urban development and the existing agricultural activities is within the City's Urban Growth Boundary.

The Project site has many of the attributes that would likely qualify it as candidate Important Agricultural Lands, pursuant to Chapter 205, Hawaii Revised Statutes. The loss of these highly productive agricultural lands and any relocation of the affected farming operations northward make it critical that the agricultural lands, north of the H-1 Freeway and along Kunia Road, designated as "Agricultural Land Preservation" in the Ewa Development Plan and Central Oahu Sustainable Communities Plan remain in agriculture.

The DEIS states that the project will displace less than one-tenth of one percent of the 70,000 acres of agricultural land in cultivation on Oahu. Obviously the impact on agricultural lands in central Oahu is much greater. We recommend that the DEIS

include information on the scale of the agricultural activities affected within the vicinity of the Project. For instance, the DEIS for the Hoopili development through which the Project right-of-way passes through, identified four farming operations that are leased or licensed to occupy agricultural lands in the vicinity of the Project – Aloun Farms (1,000 acres of which 301 were planted), Fat Law's Farm (100 acres of which 80 were planted), Sugarland Farms (197 acres of which 64 were planted), and Syngenta Seeds (200 acres of which 59 were planted). These four farms had $6 million in farmgate revenues, or 4.4% of Oahu revenue from sales of all crops (2006 Statistics of Hawaii Agriculture, page 81), or 14.3% of the farmgate value of vegetables and melons produced on Oahu (ibid., page 80). The farms employed 77 people represents about 3.9% of all the farm workers on Oahu (ibid., page 156).

Furthermore, we recommend that the affected farm operations be made aware and kept informed of the phasing of development, and that they be allowed transit of farm personnel and equipment for fields to be affected by the Project right-of-way so as to maximize their productive use of the leased/licensed lands for as long as possible.

Sincerely,

Sandra Lee Kunimoto
Chairperson, Board of Agriculture

RECEIVED
09 FEB 4 P12:21
DIRECTOR'S OFFICE
DEPT. OF
TRANSPORTATION SERVICES

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT2/09-298279R

Honorable Sandra Lee Kunimoto, Chairperson
Department of Agriculture
State of Hawaii
1428 South King Street
Honolulu, Hawaii 96814-2512

Dear Ms. Kunimoto:

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

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

In Section 4.2.3, Environmental Consequences and Mitigation, of the Final EIS, agricultural lands currently in cultivation as well as agricultural lands designated by the U.S. Department of Agriculture (USDA), the Natural Resources Conservation Service (NRCS), or the State of Hawaii as prime, unique, or of statewide importance, are noted. Some of the designated lands are not currently in active cultivation. The 2002 Census of Agriculture reported that there are more than 70,000 acres of agricultural land in cultivation on Oahu. The use of agricultural land by the Project represents less than one-tenth of one percent of available agricultural land on Oahu.

As further described in Section 4.2.3, approximately 80 acres of prime farmland and 8 acres of statewide-important farmlands will be acquired by the Project, of which 70 acres are actively cultivated. About half of the agricultural property that could be used for the Project is located at the Hoopili maintenance and storage facility option. The site is currently used for agricultural purposes by Aloun Farms, which is leased from a private developer, and is proposed for development in the future as a mixed use development as discussed in Section 4.19.3 of the Final EIS. Total potential effects to agricultural lands is presented in the Final EIS; however, the preferred alternative

for the maintenance and storage facility is the former Navy fuel storage and delivery facility near Leeward Community College. If the Project can acquire this site, only about 47 agricultural acres of land designated prime or of statewide importance will be used for the Project.

The Adopted Ewa Development Plan (DPP 2000) outlines the use of some areas for dense development while preserving other areas for agriculture. While this area is designated for agriculture use by County zoning, it is outside of the Agricultural and Preservation Area identified in the Ewa Development Plan as illustrated in on Figure 4-2 of the Final EIS. Designation of lands for "Agricultural Land Preservation" is the responsibility of the City's Department of Planning and Permitting (DPP).

As provided in Section 4.19.2, Indirect Effects, in this Final EIS: It is not expected that the Project would lead to an increase in the overall level of growth allowed or expected in the study corridor. Rather, it will influence the distribution rate, density, and intensity of development in the study corridor. It would also support transit-oriented development (TOD) making it more likely that growth would be focused into patterns that would increase the number of viable travel options available to corridor residents and employees, including transit, walking, and bicycling. As an additional benefit, compact TOD would reduce the cost of providing utilities, facilities, and services to new residential and commercial developments.

Operating farms that are affected by the transit project will be given information so they can plan their productive use of the leased lands. There will be a public information program to keep the public (including businesses) informed of construction areas and plans. This program will involve information dissemination and education through the various techniques discussed in Section 8.7, Continuing Public Involvement through Construction, in this Final EIS. Further, as stated in Section 3.5.7, Mitigation of Construction-related Effects, in this Final EIS, the Maintenance of Traffic (MOT) Plan will be developed by the contractor for each phase of construction, and coordinated with and subject to approval by Hawaii Department of Transportation and the City. The Project is committed to such a plan; however, the MOT Plan cannot be developed until final design for the Project is completed to account for all facets of the design. As discussed in Section 4.4 Acquisitions, Displacements, and Relocations, relocation services will be provided to all affected business and residential property owners and tenants without discrimination; and persons, businesses, or organizations that are displaced as a result of the Project will be treated fairly and equitably.

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

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

LINDA LINGLE
GOVERNOR

GEORGINA K. KAWAMURA
DIRECTOR

ROBERT N. E. PIPER
DEPUTY DIRECTOR

EMPLOYEES' RETIREMENT SYSTEM
HAWAII EMPLOYER-UNION HEALTH BENEFITS TRUST FUND
OFFICE OF THE PUBLIC DEFENDER
PUBLIC UTILITIES COMMISSION

STATE OF HAWAII
DEPARTMENT OF BUDGET AND FINANCE
P.O. BOX 150
HONOLULU, HAWAII 96810-0150

ADMINISTRATIVE AND RESEARCH OFFICE
BUDGET, PROGRAM PLANNING AND
MANAGEMENT DIVISION
FINANCIAL ADMINISTRATION DIVISION

February 6, 2009

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

Dear Mr. Yoshioka:

Your request for comments on the Honolulu High-Capacity-Capacity Transit Corridor Project Draft Environmental Impact Statement/Section 4(f) Evaluation and Supplemental Information, has been reviewed. In accordance with Chapter 343, HRS, we have no substantive comment to provide at this time.

If you should have any questions regarding this matter, please contact Mr. Neal Miyahira, Administrator of the Budget, Program Planning and Management Division at (808) 586-1530.

Aloha,

GEORGINA K. KAWAMURA
Director of Finance

c: Mr. Barry Fukunaga

RECEIVED
09 FEB 11 P3:01
TRANSPORTATION SERVICES
CITY & COUNTY OF HONOLULU

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT2/09-299499R

Honorable Georgina K. Kawamura, Director
Department of Budget and Finance
State of Hawaii
P.O. Box 150
Honolulu, Hawaii 96810-0150

Dear Ms. Kawamura:

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

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

Review by your agency has been noted.

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

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

LINDA LINGLE
GOVERNOR
THEODORE E. LIU
DIRECTOR
MARK K. ANDERSON
DEPUTY DIRECTOR

DEPARTMENT OF BUSINESS, ECONOMIC DEVELOPMENT & TOURISM

No. 1 Capitol District Building, 250 South Hotel Street, 5th Floor, Honolulu, Hawaii 96813
Mailing Address: P.O. Box 2359, Honolulu, Hawaii 96804
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Telephone: (808) 586-2355
Fax: (808) 586-2377

298155

February 3, 2009

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

RECEIVED
09 FEB 5 P12:34
DIRECTOR'S OFFICE
DEPARTMENT OF TRANSPORTATION SERVICES
CITY & COUNTY OF HONOLULU

Dear Mr. Yoshioka:

Subject: Honolulu High Capacity Transit Corridor Project
Draft Environmental Impact Statement (EIS)

Thank you for sending the State Department of Business, Economic Development & Tourism (DBEDT) a copy of the subject document for review. Following are the recommendations of my department by division.

Research and Economic Analysis Division

DBEDT's Research and Economic Analysis Division, the departmental lead for economic research, methodology, data collection and tracking, has the following recommendations.

1. Page 4-154, Employment: The description on indirect and induced jobs is not clear. We recommend the following wording: "Indirect employment is the jobs created in the supporting industries such as building suppliers, wholesale and retail trade, and transportation, as a result of the rail construction. Induced employment results from the increase in spending by the employees of the construction and other supporting industries from income derived from the rail construction."

2. Table 4-33: The employment impacts are over estimated for the following reasons:

   A) Total costs were used in estimating the jobs impact, which is equivalent to the assumption that all funds are coming from out of state. Most of the funding comes from the 0.5% County Surcharge Tax. Oahu residents will reduce their consumption on other goods and services due to the increase in the total tax rate. The job loss due to the reduction in resident spending should be taken into account.

B) The assumption that all funds will be spent on construction is not accurate. A portion of the funds will be used for importing equipment and conducting other studies like the one under review. When calculating the employment impact, it is better to itemize the spending by sector rather than assume that it will all be spent on one industry - construction.

Strategic Industry Division

The Strategic Industries Division of DBEDT, the departmental lead on energy, science and technology issues, has the following recommendations.

1. Page 4-108: With respect to the amount of power the system is projected to consume, the report states, "The Project would consume approximately 1 to 2 percent of the total projected electricity generated in 2030." This is open to some interpretation. What is the actual amount of power the rail will need to operate, and will that demand coincide with the utility's peak electrical demand? Will the City and County develop any type of renewable energy or energy storage projects to meet the requirements for the system? The report goes on to state, "Integration of photo-voltaic cells into stations and other project features could reduce net project electricity demaod." How much PV are they estimating they will install, and what percentage of station or system energy requirements will be met by these additions? What other alternatives are they considering as primary or backup power for the system? The bottom line is that more specific details should be provided.

2. In addition, we would like to call your attention to the following considerations:

   A) **State energy conservation goals.** Project buildings, activities, and site grounds should be designed and/or retrofit with energy saving considerations. The mandate for such consideration is found in Chapter 344, HRS ("State Environmental Policy") and Chapter 226 ("Hawaii State Planning Act"). In particular, we would like to call to your attention HRS 226 18(c) (4) which includes a State objective of promoting all cost-effective energy conservation through adoption of energy-efficient practices and technologies.

   B) **Energy and resource efficiency.** We encourage a leadership commitment to implement innovative and resource efficient operations and management, and to design and construct related buildings to meet and receive certification for U.S. Green Building Council's Leadership in Energy and Environmental Design (LEED), among others. We also

encourage planning for or installing energy reduction, energy savings, or energy producing efforts and technologies to lessen electrical consumption or to increase efficiencies in using electrical energy.

Thank you for allowing us to provide these recommendations and we look forward to receiving a copy an updated Final EIS.

Sincerely,

Theodore E. Liu

c: Barry Fukunaga, Office of the Governor

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT2/09-298455R

Honorable Theodore E. Liu
State of Hawaii
Department of Business, Economic Development
and Tourism
P.O. Box 2359
Honolulu, Hawaii 96804

Dear Mr. Liu:

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

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

Research and Economic Development Division

The recommended definitions regarding indirect employment and induced employment in Section 4.18.1 of the Draft EIS have been integrated into this Final EIS, Section 4.19.1, Background and Methodology [Indirect and Cumulative Effects].

The employment figures presented in Table 4-33 of the Draft EIS were based upon total capital costs associated with the Project. The construction employment analysis did not consider the proposed capital funding sources as presented in

Section 6.2.2 of the Draft EIS to calculate the net employment increase. The net increase in employment will be that portion of the capital cost that is paid by funding sources outside of the State (sometimes referred to as "new money"). Since about one-fifth of the total funding source comes from FTA New Starts funding, the net increase in construction employment from "new money" is about one-fifth of the total presented in Table 4-33.

Note that the employment effects shown in Table 4-35, Employment Effects, in this Final EIS are slightly different from those shown in the Draft EIS. The Draft EIS was based on the 2008 State of Hawaii multiplier rate for heavy civil construction, while the Final EIS used the updated 2009 multipliers.

DTS's analysis indicates that the 0.5 percent surcharge is small enough that it is unlikely to have significant impacts on consumers' discretionary spending habits.

The amount of project capital costs related to additional engineering (final design) and construction management are a very small percentage of the overall budget for project capital costs. While the employment multipliers may be different for engineering and construction management than for heavy civil construction, the differences are not that great to change the overall analysis of employment impacts associated with the Project.

Strategic Industries Division

As discussed in Section 4.10.3 of the Draft EIS, the elevated guideway transit system will require about 1,224 million BTUs per day; this corresponds to about 358 megawatt hours per day. Given that the trains will be running 20 hours per day, this means that the demand load of the transit system on HECO's grid will be 17.9 megawatts. HECO and the independent power producers on Oahu have a firm generating capacity of 1,727 megawatts. Note that projected energy demand shown in Table 4-21, 2030 Summary of Average Daily Transportation Energy Demand in this Final EIS are slightly higher than those reported in the Draft EIS. Since release of the Draft EIS the energy demand was updated based on new vehicle miles traveled data.

HECO and the independent power producers generate about 11 percent of their generating capacity through renewable energy sources. HECO is currently requesting proposals for additional non-firm renewable-energy generating capacity up to 100 megawatts to be in service between 2010 and 2014.

Because of the large current and voltage demands for the propulsion systems for the trains, the transit system cannot directly use alternative energy sources to power the transit system but has to receive power from HECO's grid.

Within the Architecture Design Criteria for the stations, the station design goals includes the following, "Reduce energy consumption and consider the generation of a portion of each station's and support facility's energy requirements through incorporation of new generation integrated photovoltaic technology in canopy structures and roofs." At

this time the station designs, along with their electrical needs that can be met with photovoltaic technology, have not been advanced to provide additional specificity. However, renewable sources, including photovoltaic will be incorporated where feasible.

Sustainability Design Criteria have been prepared to be included in the Project contract documents. The Sustainability Design Criteria reference the City and County of Honolulu Ordinance 06-06 – Green Building Standards for City Facilities. HRS 226 18(c) (4) will be added to the applicable codes and standards of the Sustainability Design Criteria. The Sustainability Design Criteria commit the Project to the following LEED Certification: "Project buildings over 5,000 square feet in area shall be designed to achieve a LEED Silver certification level as defined by the U.S. Green Building Council (USGBC) LEED Green Building Rating System for New Construction and Major Renovation." This will apply to the maintenance and storage facility.

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

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

LINDA LINGLE
GOVERNOR
THEODORE E. LIU
DIRECTOR
MARK K. ANDERSON
DEPUTY DIRECTOR
ABBEY SETH MAYER
DIRECTOR
OFFICE OF PLANNING

DEPARTMENT OF BUSINESS, ECONOMIC DEVELOPMENT & TOURISM

OFFICE OF PLANNING

235 South Beretania Street, 6th Floor, Honolulu, Hawaii 96813
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Ref. No. P-12371

December 24, 2008

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

Dear Mr. Yoshioka:

Subject: Honolulu High-Capacity Transit Corridor Project
Draft Environmental Impact Statement (EIS)

Thank you for sending the Office of Planning the Draft EIS for the above referenced project. The action triggering the environmental review is the requested use of federal and State funds and land to implement the project.

The project's purpose is to provide high-capacity rapid transit in the highly congested east-west transportation corridor between Kapolei and the University of Hawaii at Manoa, as specified in the Oahu Regional Transportation Plan 2030 (Oahu Metropolitan Planning Organization 2007).

The Office of Planning recommends that the Final EIS sufficiently cover areas of State concern. The Final EIS should consider the impacts of the proposed project and appropriate mitigation measures covering the following issues:

1. **Agricultural Lands** – Preservation of important agricultural lands is a priority for the State and counties. The Draft EIS has a discussion of the issue in Section 4.1.3 but concludes that the effect would not be significant. These lands are currently in agricultural use and represent a significant percentage of prime agricultural lands on Oahu. Please discuss how the loss of these lands can be justified, how other lands of equal importance on Oahu can be protected, and the impact to the specific farm operations and whether they will be able to relocate.

2. **Cultural/Historic Resources** – The Department of Land and Natural Resources, State Historic Preservation Division (SHPD) reviewed the technical reports prepared for the project and did not have any questions or comments regarding the

methodology used to determine National Register eligibility. SHPD has reviewed the preliminary determination of effects presented in the Draft EIS but has not completed concurrence on determination of adverse effects. SHPD has raised concerns regarding indirect effects to several resources and the magnitude of the effects to the Chinatown Historic District. The Final EIS should include an inventory survey of cultural and historic sites, with monitoring and preservation plans approved by SHPD.

3. **Coastal Zone Management (CZM)** – The proposed project site is entirely within the State Coastal Zone Management Area. The State oversees protection of natural, cultural, and economic resources within the coastal zone. The project as proposed appears to generally conform to the State CZM objectives and policies.

The Office of Planning looks forward to receiving an updated Final EIS with the potential impacts and mitigation measures for the above issues clarified and addressed. If you have any questions, please call Scott Derrickson, AICP, in the Land Use Division at 587-2805.

Sincerely,

Abbey Seth Mayer
Director

c: Mr. Barry Fukunaga, Office of the Governor
Office of Environmental Quality Control
Mr. Theodore E. Liu, DBEDT
Mr. Chris Baron, DBEDT

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT12/08-293186R

Mr. Abbey Seth Mayer, Director
Office of Planning
Department of Business, Economic Development
and Tourism
State of Hawaii
P.O. Box 2359
Honolulu, Hawaii 96804

Dear Mr. Mayer:

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

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

Agricultural Land

In Section 4.2.3, Environmental Consequences and Mitigation, of the Final EIS, agricultural lands currently in cultivation agricultural lands designated by the U.S. Department of Agriculture (USDA), the Natural Resources Conservation Service (NRCS), or the State of Hawaii as prime, unique, or of statewide importance, are noted. Some of the designated lands are not currently in active cultivation. The 2002 Census of Agriculture reported that there are more than

70,000 acres of agricultural land in cultivation on Oahu. The use of agricultural land by the Project represents less than one-tenth of one percent of available agricultural land on Oahu.

As described in Section 4.2.3, Environmental Consequences and Mitigation, in this Final EIS, approximately 80 acres of prime farmland and 8 acres of statewide-important farmlands will be acquired by the Project, of which 70 acres are actively cultivated. About half of the agricultural property that could be used for the Project is located at the Hoopili maintenance and storage facility option. The site is currently used for agricultural purposes by Aloun Farms, which is leased from a private developer, and is proposed for development in the future as a mixed use planned development as discussed in Section 4.19.3, Cumulative Effects, of this Final EIS.

The Adopted Ewa Development Plan (DPP 2000) outlines the use of some areas for dense development while preserving other areas for agriculture. While this area is designated for agriculture use by County zoning, it is outside of the Agricultural and Preservation Area identified in the Ewa Development Plan as discussed in Section 4.19.3, Cumulative Effects, of this Final EIS.

Total potential effects to agricultural lands is presented in the Final EIS; however, the preferred alternative for the maintenance and storage facility is the former Navy fuel storage and delivery facility near Leeward Community College. If the Project can acquire this site, only about 47 acres of agricultural land designated prime or of statewide importance will be used for the Project.

As provided in Section 4.19.2, Indirect Effects, in this Final EIS: It is not expected that the Project would lead to an increase in the overall level of growth allowed or expected in the study corridor. Rather, it will influence the distribution rate, density, and intensity of development in the study corridor. It would also support transit-oriented development (TOD) making it more likely that growth would be focused into patterns that would increase the number of viable travel options available to corridor residents and employees, including transit, walking, and bicycling. As an additional benefit, compact TOD would reduce the cost of providing utilities, facilities, and services to new residential and commercial developments.

Cultural/Historic Resources

Section 4.16, Archaeological, Cultural, and Historic Resources, in this Final EIS contains a complete inventory of historic resources and analysis of impacts to such resources. The eligible or listed historic resources (individual or districts) contained in the Area of Potential Effects are listed in Section 4.16.3 of the Final EIS. State Historic Preservation Division (SHPD) effect determinations as provided in correspondence dated May 21, 2009, and July 22, 2009, were accepted by the FTA. Coordination and consultation with the SHPD and other Section 106 consulting parties has continued since release of the Draft EIS. The status of the final effects determinations and a summary of the consultation process and mitigation are presented in this Final EIS. Mitigation of adverse impacts to historic resources is included in the Programmatic Agreement (Appendix H).

Coastal Zone Management (CZM)

Table 4-40 in this Final EIS, identifies the permits, approvals, and agreements for this Project including the need for a Coastal Zone Management Program consistency determination. The application approval will be submitted to DEBDT following the submittal of FTA New Starts of FFGA application.

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

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

LINDA LINGLE
GOVERNOR

MAJOR GENERAL ROBERT G. F. LEE
DIRECTOR OF CIVIL DEFENSE

EDWARD Y. TEIXEIRA
VICE DIRECTOR OF CIVIL DEFENSE

PHONE (808) 733-4300
FAX (808) 733-4287

STATE OF HAWAII
DEPARTMENT OF DEFENSE
OFFICE OF THE DIRECTOR OF CIVIL DEFENSE
3949 DIAMOND HEAD ROAD
HONOLULU, HAWAII 96816-4495

February 10, 2008

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

Dear Mr. Yoshioka:

Draft Environmental Impact Statement
Honolulu High-Capacity Transit Corridor Project, Oahu, Hawaii

Thank you for the opportunity to comment on this important and historic development. After careful review of the documents provided for this project, we wish to propose the following recommendations:

- Relating to Hazardous Materials sites, we feel that the right of way acquisition and site remediation for displaced hazardous materials operations are not fully addressed. If it has not already been done, the Department of Health should be consulted to review this area.

- Mitigation and flood plain management to control storm water quality and quantity may need to be more adequately addressed. If not already done, the Department of Land and Natural Resources should be consulted to review this area.

- When planning the location of transit stops, it is crucial for the safety of passengers that the stops and surrounding development be built outside tsunami evacuation zones. During a destructive tsunami, the structure supporting the transit system could become part of the debris field and cause extensive damage, including the loss of the system.

- In order to alert passengers of approaching tsunamis or other hazards, we recommend that both audible and visual warning displays be included in each transit station. The warning displays should be able to provide emergency information to passengers, including hearing impaired and visually impaired personnel. This warning system should aid in instructing passengers where and how to evacuate should the need arise.

- Due to Homeland Security consideration and for critical infrastructure protection, we recommend that the transit stations and support columns for the transit system be built with blast barriers designed to prevent automobiles from approaching too closely. Items such as cement planters, etc, could be incorporated into the design and could provide a level of deterrence from attack.

- According to the draft EIS, freeway traffic lanes will be taken away, some temporarily for construction and some permanently. Questions that arise include where will these lane closures occur and what are their durations? Are there plans for traffic rerouting? Evacuation plans will be affected and first responders will need clear access to all neighborhoods. What plans have the City made or are planning to make in the future to mitigate the effects of any loss of lanes?

- What effect will a hurricane have on the new rail system? Are trains expected to operate? By way of comparison, the train system in Houston was shut down for ten days due to Hurricane Ike. What plans are in place to replace transportation lost for rail users once the system is deactivated due to damage?

- Two existing sirens in Waipahu and two in the Honolulu International Airport area are directly in the path of the proposed rail system. These four sirens will have to be relocated due to the construction. We will gladly work with the contractor to find suitable locations for all four sirens.

If you have any questions, please contact Mr. Richard Stercho, State Civil Defense Hazard Mitigation Planner, at (808) 733-4300, ext. 583.

Sincerely,

EDWARD T. TEIXEIRA
Vice Director of Civil Defense

c: Mr. Ted Manley, FTA Region IX
Office of Environmental Quality Control

DEPARTMENT OF TRANSPORTATION SERVICES

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT2/09-299638R

Mr. Edward T. Teixeira
Vice Director of Civil Defense
Department of Defense
State of Hawaii
3949 Diamond Head Road
Honolulu, Hawaii 96816-4495

Dear Mr. Teixeira:

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

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

The Project has and will continue to work with the Hawaii Department of Health to address hazardous materials/waste issues along the Project corridor as construction of the system approaches. Table 4-22 in the Final EIS identifies specific sites of concern relative to contamination. As discussed in Section 4.12.3 of the Final EIS, a Phase I Environmental Site Assessment will be performed by the City prior to right-of-way acquisitions for parcels identified as having a risk of contamination.

The State Department of Land and Natural Resources provided comments on the Draft EIS regarding mitigation and floodplain management with respect to stormwater management

and best management practices (BMP). BMPs will be implemented during construction pursuant to the NPDES Construction Stormwater permit. Permanent BMPs are being designed for the park-and-ride facilities and the vehicle maintenance and storage facility to maintain on-site infiltration and prevent polluted runoff from entering streams and near shore waters.

As stated in the introduction section of Chapter 4 in the Final EIS: "The Project will be designed to meet seismic and other design standards related to natural hazards, such as wind forces from tropical storms. The project alignment is outside the tsunami evacuation zones." Stations will be equipped with both audible and visual message systems. Civil defense alerts can be transmitted over this system to inform transit users of tsunamis or other hazards. The transit operating agency will work with Hawaii Department of Defense to develop clear messages and protocols for civil defense alerts prior to commencement of transit operations.

The system will be designed to comply with design requirements for elevated transportation facilities. Columns in roadway medians will have setbacks from the curb face and be designed to withstand an automobile collision. In addition, a safety and security plan will be developed and implemented.

Table 3-21 in the Final EIS presents information regarding column placement effects on streets and highways. The effects listed in this table are permanent. As seen, the Project would not result in any travel lanes being taken away. Some lane widths would be reduced to accommodate column placement; however, this will not affect roadway capacity. As shown in Table 3-23, six intersections will be affected by project-related traffic during the a.m. and p.m. peak hours. Planned mitigation measures to address traffic effects at these intersections are discussed in Section 3.4.7 of the Final EIS. As such, there will not be any permanent impacts on roadway capacity or emergency evacuations.

Table 3-27 in the Final EIS presents information on potential peak-period lane closures during construction. These closures will be temporary in nature. Prior to construction, a Maintenance of Traffic (MOT) Plan will be prepared and will identify the duration of lane closures and plans for traffic rerouting. The contractor will develop the MOT Plan with approval from the City DTS and Hawaii Department of Transportation. Any temporary closures to support construction will be coordinated with emergency service providers and will address emergency evacuation routes.

As discussed in the Geology, Soils, Farmlands, and Natural Hazards Technical Report (RTD 2008), the guideway and other structures will be designed and constructed to withstand wind forces from tropical storms. Some piers and stations will be located within floodplains, but no increased hazards are anticipated because the guideway and stations will be elevated. The aforementioned technical report is available on the Project website (www.honolulutransit.org). Since trains and rail stations will be electrically powered, the system's infrastructure is being designed to handle service disruptions. For example, trains will draw power from many points along the route, so an outage in a few areas should not disrupt service. If electrical power is lost systemwide, then train brakes are designed to stop the rail cars even without power, lights will stay on in trains and stations, and backup batteries will provide lighting for several hours. The train operations center will communicate with passengers via the public address system and intercom and provide guidance during any power disruptions.

If power is restored within a short time, service will resume. With a prolonged outage, the operations center will direct passengers to exit the trains and walk along a lighted emergency walkway on the guideway to the nearest station. For those unable to exit rail cars, help will be provided by emergency responders and transit staff. Passengers will be met at the train station by a coordinated response from emergency responders and City transportation workers. TheBus will be available as an alternate transit system to the Project. Capacity will be added with buses to the extent possible depending on the resources available.

DTS will work with the Office of Civil Defense to ensure any sirens affected by construction are relocated in suitable locations.

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

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

LINDA LINGLE
GOVERNOR

PATRICIA HAMAMOTO
SUPERINTENDENT

STATE OF HAWAI'I
DEPARTMENT OF EDUCATION
P.O. BOX 2360
HONOLULU, HAWAI'I 96804

OFFICE OF SCHOOL FACILITIES AND SUPPORT SERVICES

February 2, 2009

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

Dear Mr. Yoshioka:

SUBJECT: Draft Environmental Impact Statement for the Honolulu Transit Corridor Project

The Department of Education (DOE) has reviewed the Draft Environmental Impact Statement (DEIS) for the Transit Corridor Project (Project). The DEIS is comprehensive in identifying all DOE schools adjacent to the Project, however there should be certain consistencies in identification throughout the DEIS. Pearl City Elementary School is adjacent to the alignment but isn't identified as a school on all maps. Aliamanu Elementary and Aliamanu Middle are two distinct schools.

The DEIS has no information on future public school sites which are in proximity to the Project. Maps should include the sites of the elementary school on the University of Hawaii – West Oahu land, and the elementary and middle schools within the Department of Hawaiian Home Lands East Kapolei project. The DEIS also does not identify the Pohukaina block in Kakaako (adjacent to the Mother Waldron Park) as a potential school site with its own impacts.

In the maps of planned extension routes for the Project, there is no identification of the existing Barbers Point Elementary or Lunalilo Elementary.

The largest amount of land that would be given up for the Project is the estimated .16 acres at Waipahu High School, if the maintenance and storage facility is located at the former Navy Drum property. In addition to the removal, relocation and replacement of school facilities in the school area identified for acquisition, the DOE would want to see plans for landscaping since the strip of land remains a part of the face of the campus. The DOE also wants to be sure there are adequate security measures taken to prevent public access from school property.

The need for landscaping and maintenance of the landscaping also applies to Radford High School, Aliamanu Middle and Aliamanu Elementary, where the project proposes to cross along their "front yard."

The discussion of transit oriented development, which goes hand-in-hand with the development of the transit system, does not acknowledge that increased residential density in urban areas such as Waipahu could generate demand for additional public service space such as parks and school sites that cannot be met in areas already so urbanized.

The DEIS discussion on noise impacts claims there are 18 to 23 residential buildings, parks and schools that will experience adverse noise effects. The DOE would like to know which DOE schools are in that count. We would also like to know which future schools might experience adverse effects, such as a future school on the Pohukaina block of Kakaako.

The Board of Education (BOE) has a policy for when air conditioning or other noise control measures must be provided. During construction, or during the transit system's operations, if transit generated noise levels exceed the BOE standard of 55 dBA; the project will need to provide mitigation. If the mitigation includes air conditioning, it must also include electrical upgrades to support the air conditioning as well as provide ongoing maintenance.

The DEIS acknowledges schools adjacent to the project will be affected by a variety of construction issues. The DOE notes the DEIS statements that efforts will be made to mitigate these effects. The DOE seeks assurance that school principals will be consulted about construction schedules and all construction impacts when work is planned near the affected schools.

The DOE appreciates the opportunity to review the DEIS. If you have any questions, please call Heidi Meeker of the Facilities Development Branch at 377-8301.

Sincerely yours,

Duane Y. Kashiwai
Public Works Administrator

DYK:jmb

DEPARTMENT OF TRANSPORTATION SERVICES

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT2/09-298283R

Mr. Duane Y. Kashiwai, Public Works Administrator
Office of School Facilities & Support Services
Department of Education
State of Hawaii
P.O. Box 2360
Honolulu, Hawaii 96804

Dear Mr. Kashiwai:

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

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

Mahalo for clarifying the location and names of schools along the fixed guideway alignments. Pearl City Elementary School has been added to figures in Section 4.5 of the Final EIS, which illustrate community facilities. Aliamanu Elementary and Aliamanu Middle Schools are along the Salt Lake Boulevard Alignment. The Airport Alternative from East Kapolei to Ala Moana Center has been identified as the Preferred Alternative. The identification of the Airport Alternative as the Preferred Alternative was made by the City to comply with FTA's NEPA regulations that state that the Final EIS should focus on the Preferred Alternative [23 CFR 771.125 (a)(1)]. Accordingly, maps in the Final EIS do not show effects along the Salt Lake Boulevard alignment.

The Draft and Final EISs only identify existing schools adjacent to the Project. Schools that will be constructed in the future are discussed generally in Section 4.19.3 under Community Facilities and Public Services.

The Project has logical termini at East Kapolei and Ala Moana Center and independent utility from any extensions that may be constructed in the future. The future extensions to West Kapolei, Salt Lake Boulevard, Waikiki, and UH Manoa are discussed in the Cumulative Effects sections of Chapters 3 and 4 of the Final EIS. However, the future extensions are not part of this Project; thus, they are not required to be evaluated under Chapter 343 of the Hawaii Revised Statutes and NEPA. Under NEPA, environmental analysis is only required when there is a proposed action by a Federal agency. Here, because the future extensions are not proposed for implementation at this time, they are not part of the Project studied in the Final EIS. It would be premature to undertake an environmental analysis of the extensions (beyond the cumulative effects analysis) because they are not part of the proposed action to be taken by the City and FTA. If the extensions are proposed for implementation in the future, environmental analysis of the extensions and appropriate alternatives will be undertaken at that time. Thus, the impacts on schools associated with the extensions are not evaluated in the Final EIS.

Landscaping is incorporated into the Project's contract documents through design criteria for landscape architecture. The proposed maintenance and storage facility will be fenced and protected from public intrusion through school property. The landscaping plans for the maintenance and storage facility will be shared with the Department of Education once they are developed.

Regarding security, the maintenance and storage facility will be fenced and lighted. Safety personnel will patrol the site.

Radford High, Aliamanu Elementary, and Aliamanu Middle Schools are along the Salt Lake Boulevard Alignment and are not included in the Final EIS.

The indirect effects of transit-oriented development (TOD) are addressed in Section 4.19.2 of the Final EIS. This section states that if development occurs around stations, it is anticipated that City infrastructure will be improved in these areas. As an additional benefit, TOD will reduce the cost of providing utilities, facilities, and services to new residential and commercial developments.

No significant noise impacts to schools or public parks are predicted as analyzed in the Draft and Final EISs. Text has been added in Section 4.10.3 of the Final EIS stating that "No noise impacts will occur for schools, public parks…as a result of the Project."

Please see the response to the comment above regarding analysis of future schools. There are no noise impacts predicted for any schools along the Project; noise levels due to operation of the trains is not expected to be above 55 dBA Leq(h) for the classrooms during the operation of the system. The project design includes an integrated noise-blocking parapet wall at the edge of the guideway structure that extends three feet above the top of the rail. The parapet wall will substantially reduce ground-level noise. Moderate impacts will occur at upper floors of a few high-rise buildings (as shown in Table 4-18 in the Final EIS). With the

recommended mitigation in place (sound absorbing material and wheel skirts), the noise analysis indicates that the new noise generated by the Project will be lower than the existing noise levels in most places. Wheel skirts will increase the benefit from the parapet wall at locations above the elevation of the track. The use of sound-absorptive materials below the tracks in the areas that will experience moderate noise impacts will reduce the Project noise levels from the upper floors to below the impact level. Once the Project is operating, noise levels will be remeasured to confirm that there are no noise impacts from the Project.

From Section 4.18.2 Communities and Neighborhoods [Construction Phase Effects]: During development of the Construction Safety and Security Plans, measures will be identified to minimize effects on communities and their resources that address specific consequences anticipated at each location within the various communities as well as ensure the safety of the public and the environment. Schools adjacent to the project alignment may be affected by a variety of construction issues, such as noise, vibration, air quality, and visual intrusion, depending on the school's distance from the Project. In instances where schools experience a disruption in access, the effects will be mitigated as necessary and appropriate using applicable practices similar to those outlined in Business Access in Section 4.18.1 Land Use and Economics Activity. Temporary barrier walls or fences will be placed around any school, parkland, or recreational resource to clearly delimit a construction area to avoid public exposure to any possible construction hazards.

Mitigation measures for construction near schools will be finalized during the design and construction phase, when more information on the types of construction activities is determined. Coordination will continue throughout the process and advance notification of construction will be supplied when construction is planned for locations near Department of Education facilities.

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

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
Creation Date :	12/18/2008
Creator Affiliation :	
First Name :	Troy
Last Name :	Kimura
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Address :	824 Kinau St
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Telephone :	808-741-4713
Telephone Extension :	
Add to Mailing List :	Both
Submission Method :	Website
Other Submission Method :	
Submission Date :	12/18/2008
Submission Content/Notes :	The first phase of construction should serve the Downtown-Mapunapuna area, not the Kapolei-Waipahu araa. The idea is that there will be more riders who use the rail if the destination is the downtown area, and it should provide immediate traffic relief in the Salt Lake, H-1 Middle and Kalihi areas. Each of these areas are severely impacted by current traffic volume because each of them have major highway and freeway interchanges with no room to expand. As someone whos worked as a courier in that area on a daily basis I can tell you first hand that these places are the ones that back everyone else up. These areas also have a high volume of industrial traffic which will benefit greatly from less vehicles in that vicinity which in turn may curb their fuel usage, and help keep costs associated with transportation of their goods at a reasonable rate.

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT10/09-338267

Mr. Troy Kimura
Facility Development Branch
Department of Education
State of Hawaii
824 Kinau Street, #812
Honolulu, Hawaii 96813

Dear Mr. Kimura:

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

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

As described in Section 2.5.10 of the Final EIS and further in Section 8.6.9,, to support phased opening of the system, the first construction phase must be connected to a maintenance and storage facility, which requires considerable space. The first phase of the Project must be connected to the maintenance and storage facility because, in addition to maintenance of equipment and ongoing operations, the maintenance and storage facility houses the main control center for the entire Project, and the required testing and operation of the system could not be completed without access to it. No location has been identified closer to Downtown, with sufficient available space to construct a maintenance and storage facility. Therefore,

construction will begin between East Kapolei and Leeward Community College. The Project will be constructed in phases to accomplish the following:

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

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

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

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

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

LINDA LINGLE
GOVERNOR
STATE OF HAWAII

MICAH A. KANE
CHAIRMAN
HAWAIIAN HOMES COMMISSION

KAULANA H. PARK
DEPUTY TO THE CHAIRMAN

ROBERT J. HALL
EXECUTIVE ASSISTANT

STATE OF HAWAI'I
DEPARTMENT OF HAWAIIAN HOME LANDS
P.O. BOX 1879
HONOLULU, HAWAII 96805

February 6, 2009

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

Dear Mr. Yoshioka:

Subject: Comments on the Draft Environmental Impact Statement (DEIS) for the Honolulu High-Capacity Transit Corridor (HHCTC) Project

Mahalo for the opportunity to provide comments on the subject DEIS and for extending the public review period on this important project.

As stated in the DEIS, the Department of Hawaiian Home Lands (DHHL) has several new development projects in East Kapolei that would be impacted by the proposed HHCTC project. We have reviewed the document and provide the following comments.

Over the past few years DHHL has expedited the number of homestead awards to qualified native Hawaiians and have focused on ensuring that new and existing homesteads are livable and complete communities. DHHL seeks to enhance the quality of life for all its beneficiaries and to ensure that they not only have adequate shelter, but their homes are energy efficient, well served by schools, internet ready, transit ready, and pedestrian oriented. Our goal is to provide live, work, play and educational opportunities within our communities.

Kapolei/Ewa is the fastest growing region in the State of Hawai'i. There are several public and private investments driving the growth of this secondary urban center on O'ahu. Major road and utility infrastructure projects, a University of Hawai'i West O'ahu campus (UHWO), major residential clusters, and nodes of commercial development are amongst the investments being supported as the region continues to develop.

DHHL's Kapolei lands are in the middle of this prospering secondary urban center. The investments in infrastructure, employment, education, recreation, housing and commercial projects have contributed to a holistic community. These developments are leading to the actualization of Kapolei as O'ahu's Secondary Urban Center, and not just a bedroom suburb of Honolulu. Since many of DHHL's lands elsewhere in the State are located in rural or remote areas, there are few places better for DHHL to have a greater impact on meeting the needs of its beneficiaries than in Kapolei.

DHHL's East Kapolei 1 and 2 projects represent DHHL's ideal master plan community development efforts. DHHL's primary goal is to provide thriving communities where people can:

- Live (proposed single-family and multi-family residences within East Kapolei 1 and 2),
- Work (Ka Makana Ali'i regional shopping complex),
- Play (the proposed Kroc Center),
- Learn (UHWO campus, and proposed elementary and middle school sites in DHHL East Kapolei 2), and
- Shop (Ka Makana Ali'i regional shopping complex).

Additionally, DHHL has lands within Kalaeloa that would probably be best suited for industrial or industrial mixed-use development, with the potential for providing more work opportunities for its beneficiaries residing in Ewa and Waianae.

Approximately 2,650 new housing units are planned for DHHL East Kapolei 1 and 2 projects along with the headquarters for DHHL, open parks, and a preschool. Also planned for DHHL's East Kapolei 1 and 2 projects are public and community services including the Kroc Center, a new fire station site, spaces for Hawaiian organizations and a Hawaiian Homestead Heritage Center. Some of the housing will be developed by the State of Hawaii's Housing Finance and Development Corporation (HHFDC). Thus, the proposed developments on DHHL East Kapolei 1 and 2 projects will not only benefit DHHL's beneficiaries but all residents as well.

The DHHL East Kapolei 1 and 2 parcels are further surrounded and supported by other work, live, play and learn opportunities. The UHWO campus will be located immediately mauka of the East Kapolei 1 parcel providing learning opportunities (including a State Department of Education elementary school site). Recreational opportunities will be provided at proposed park sites and at the Kroc Center, which is situated within walking distance of most of the residential units in DHHL East Kapolei 2. A 1.5 million square foot regional mall is planned in the commercial parcel of DHHL East Kapolei I ("Ka Makana Ali'i regional shopping complex").

When finished, the UHWO campus is expected to have roughly 743,000 gross square feet of building space with room for expansion that could accommodate 7,600 students and 1,000 faculty and staff. DHHL supports the plans of the University of Hawai'i – West O'ahu campus to locate in East Kapolei. The proposed campus also attracts housing and commercial developments and provides opportunities to create communities where one can live, work, play, and learn.

Additionally, Kapolei's tremendous growth creates a critical mass that will attract new employment opportunities, as well as transit ridership. The UHWO campus, Kroc Center, and the planned Ka Makana Ali'i regional shopping complex on DHHL land, and other commercial and retail projects will provide future employment so that Kapolei/Ewa residents will not be forced to commute to Honolulu and Waikiki. **For this reason, DHHL is supportive of the proposed phasing of the HHCTC project to start construction between Kapolei and Waipahu.**

Our detailed comments on the DEIS follow:

On page 2-24, the key components of each transit are described in a "sidebar." We note that there is no mention of public restrooms (even automated public toilets) or what form of security will be provided (including security cameras). We would think that both types of facilities are necessary for old, young and otherwise. The impacts of including or not including such facilities should be directly addressed in the Final EIS (FEIS).

Vehicle Maintenance and Storage Facility – On page 2-38 of the DEIS, it is noted that one potential location for the required Vehicle Maintenance and Storage Facility would be located on a 43-acre site makai of Farrington Highway between Waipahu High School and Leeward Community College. While we concur that this site would allow for an efficient transit "system operation because it is more centrally located and vehicles could enter and exit the fixed guideway in either direction...", the loss of 43 acres of centrally located land will have a significant negative impact to DHHL's goals of providing either housing and/or economic benefits to its beneficiaries. This site is centrally located to H-1 and H-2 and would be ideal for warehousing operations for larger retailers. Located between two educational facilities, this site is also ideal for families with school-aged children or for adults interested in changing careers or life-long learning.

We believe that if the City and County of Honolulu would be willing to exchange Varona Village for the proposed Vehicle Maintenance and Storage Facility near Leeward Community College, this would help to mitigate the impacts of losing the

latter site. The Hawaiian Homes Commission Act requires that land exchanges be of equal value.

On Figure 2-14 (page 2-25), the location of the "Proposed Park-and-Ride Lot" for the East Kapolei Station is shown but what is not shown is how commuters will access the parking lot. We would, of course, be concerned about late commuters speeding through the DHHL East Kapolei 1 project to access the "Proposed Park-and-Ride Lot" for the East Kapolei Station, endangering our beneficiaries and their children commuting to a proposed DOE elementary school in the UH West O'ahu site.

On page 3-53, in the "sidebar" entitled "Summary of Findings: Transportation Conditions and Effects," we note that under the category of "Effects of the Build Alternatives," there is no mention of the traffic impacts from cars generated from the "Proposed Park-and-Ride Lots" on streets immediately surrounding such facilities.

Table 4-1, Page 4-5, "Acquisitions, Displacements, and Relocations (Section 4.3)" - The land under the selected Vehicle Maintenance and Storage Facility site would eliminate either landowner's opportunities for development of their respective sites. This should be included in Table 4-1 or elsewhere in the FEIS.

Page 4-28, Figure 4-9 – While Figure 4-3 indicates the "Future Campus of UH West O'ahu" and the "Future Salvation Army Kroc Center," Figure 4-9 does not show these important community resources and facilities, even though they are currently not in operation (but will be by the time the transit stations are built). Figure 4-9 should be revised accordingly.

Page 4-171, Table 4-36 – There is no mention of DHHL's East Kapolei 1 (between UH West O'ahu, North-South Road, Kapolei Parkway and Kapolei Golf Course) and East Kapolei 2 (between Hoopili, North-South Road and Ewa Villages) projects. Table 4-36 should be revised accordingly.

With the electorate voted in favor of proceeding with the HHCTC project this past November, DHHL wishes to express its support for the HHCTC Project, but wants to ensure that the project is done "right." We believe that the HHCTC project will increase its beneficiaries' accessibility to jobs, schools, shopping and recreational opportunities, without having to own a second car.

DHHL wants to be on record that it supports the extension of the HHCTC west towards the City of Kapolei as long as there is a transit station (identified as Kapolei Parkway Station on Figure 2-5 of the DEIS) located at DHHL's Ka Makana Ali'i regional shopping complex.

We appreciate the opportunity to provide comments on the Draft EIS. Should you have any questions regarding this matter please feel free to contact Darrell Yagodich from our Planning Office at 620-9481.

Aloha and mahalo,

Micah A. Kane, Chairman
Hawaiian Homes Commission

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, 3RD FLOOR
HONOLULU, HAWAII 96813
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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

May 21, 2010

RT2/09-299031R

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

Dear Chairman:

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

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

Each station will have a secured public restroom. Patrons will ask the station attendant for access to the restroom. As discussed in Sections 2.5.4 and 4.6.3, in this Final EIS, a Safety and Security Management Plan (SSMP) will be developed and implemented for the Project. Security will be provided in all stations and on all trains; and the City will coordinate with the Honolulu Police Department regarding security for the Project.

Further, as described in Section 2.5.4, Safety and Security Measures, in this Final EIS, the Project includes security measures to protect public services and facilities. Additional mitigation measures will include:

- *Design and architectural details to enhance safety.*
- *Use of closed-circuit television cameras and lighting included as a specific design measure.*
- *Security patrols of transit property and vehicles, ongoing train safety awareness education, and ongoing public security awareness education.*
- *Security cameras will be included throughout the system.*

As described in Section 2.5.10, Project Phasing, of the Final EIS, to support phased opening, the first construction phase must be connected to a maintenance and storage facility, which requires considerable space. No location has been identified near the Downtown area with sufficient available space to construct a maintenance and storage facility. The Project will be constructed in phases to accomplish the following:

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

The portion of the corridor Ewa of Pearl Highlands is less developed than the areas Koko Head. Right-of-way can be obtained more quickly; therefore, overall project construction can begin earlier, resulting in lower total construction costs. Construction is planned to continue uninterrupted Koko Head from Pearl Highlands to Aloha Stadium, then Kalihi, and finally to Ala Moana Center. As described in Section 4.19.3 Cumulative Effects, current land use plans anticipate extensive development of the Ewa plain irrespective of whether or not the project is built. Thus, the project may have the effect of intensifying land use in the areas near the planned stations; however, the overall development plan will not be substantially altered by the Project. The State of Hawaii prepared an Environmental Assessment (EA) of the effects of two major transportation projects, the North-South Road and Kapolei Parkway) in the Ewa area. The evaluated growth-inducing and cumulative impacts of the projects under the Hawaii Environmental Policy Act, see EA § 3.15.4.

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

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

The traffic impact of park-and-ride lots is discussed in Section 3.4.3, Effects on Streets and Highways, in this Final EIS. Traffic impacts are projected at six intersections near the East Kapolei, UH West Oahu, Pearl Highlands, and Ala Moana Station areas. Section 3.4.7 presents measures to mitigate these impacts. Traffic conditions with the planned mitigation are identified in Table 3-23, Effects on Traffic near Park-and-Ride Facilities and Bus Transit Centers—Existing Conditions, No Build Alternative, and the Project (without and with mitigation).

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

Figures 4-9 through 4-12, Community Resources and Facilities within One-half Mile, in this Final EIS, depicts existing facilities.

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

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

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

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

2984601

LINDA LINGLE
GOVERNOR OF HAWAII

CHIYOME L. FUKINO, M.D.
DIRECTOR OF HEALTH

STATE OF HAWAII
DEPARTMENT OF HEALTH
P.O. Box 3378
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In reply, please refer to:
EPO-08-163

RECEIVED
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CITY & COUNTY OF HONOLULU
DEPT. OF
TRANSPORTATION SERVICES

February 3, 2009

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

Dear Mr. Yoshioka:

SUBJECT: Draft Environmental Impact Statement (EIS) for Honolulu High-Capacity Transit Corridor Project (HHCTCP)
Honolulu and Ewa Districts, Oahu, Hawaii

Thank you for allowing us to review and comment on the subject application. The document was routed to the various branches, offices and groups of the Department. We have the following Wastewater Branch, Clean Water Branch, Hazard Evaluation and Emergency Response Office, Indoor and Radiological Health Branch, Built Environmental Working Group and General comments.

Wastewater Branch

The document identifies the current and future need to address mobility and travel reliability issues to support transportation and land use planning policies, and improve transportation equity in the corridor between Kapolei and the University of Hawaii at Manoa on the Island of Oahu.

The subject project is located in the Critical Wastewater Disposal Area (CWDA) where no new cesspools will be allowed.

Information provided to our office showed that the HHCTCP's Maintenance and Storage Facility may generate domestic and non-domestic wastewaters. We have no objections to the draft EIS provided all wastewaters generated by the facility shall be connected to the available public sewer system.

Clean Water Branch

The Department of Health (DOH), Clean Water Branch (CWB), has reviewed the subject DEIS. The CWB staff also attended December 16, 2006 Honolulu High-Capacity Transit Corridor Project Water Resources Agency Coordination Meeting held at the Transit Office. Please note that our review and comments are based on the limited technical information provided in the DEIS and additional information and knowledgement obtained during the agency coordination meeting and its compliance with Hawaii Administrative Rules (HAR), Chapters 11-54 and 11-55. The City and County of Honolulu (CCH), Department of Transportation Services (DTS), may be responsible for fulfilling additional requirements related to our program. We recommend that CCH-DTS and its consultant also read our standard comments on our website at http://www.hawaii.gov/health/environmental/env-planning/landuse/CWB-standardcomment.pdf.

1. Any project and its potential impacts to State waters must meet the following criteria:

   a. Antidegradation policy (HAR, Section 11-54-1.1), which requires that the existing uses and the level of water quality necessary to protect the existing uses of the receiving State water be maintained and protected.

   b. Designated uses (HAR, Section 11-54-3), as determined by the classification of the receiving State waters.

   c. Water quality criteria (HAR, Sections 11-54-4 through 11-54-8).

2. An application for an individual Section 401 Water Quality Certification (WQC) authorized under Clean Water Act (CWA), Section 401; Hawaii Revised Statutes (HRS), Section 342D-53; and HAR, Chapter 11-54 is required for the subject project. Table 4-37 (Page 4-176 of DEIS) has identified that a Department of the Army (DA) CWA, Section 404 permit is anticipated. As discussed in Item No. 4.13.1 (page 4-128 of DEIS), the requirement of a DA Section 404 permit triggers the need for DOH's CWA, Section 401 WQC.

   We were further informed at the meeting that a standard (individual) DA CWA, Section 404 permit is required for the placement of drilled shafts/piers in at least four (4) streams.

   In addition, the construction of any drainage outfall and associated shore protection structures may also require the DA CWA, Section 404 permit and DOH Section 401 WQC coverage if the work is to be conducted below the high water mark.

Section 401 WQC Application and Guidelines may be picked up at our office or downloaded from our website at:
http://www.hawaii.gov/health/environmental/water/cleanwater/forms/wqc-index.htm

3. The CCH-DTS is required to obtain a National Pollutant Discharge Elimination System (NPDES) permit for discharges of wastewater, including storm water runoff, into State surface waters authorized under CWA, Section 402; HRS, Chapter 342D; and HAR, Chapter 11-55. An NPDES permit is required for effluent discharges from the following activities and/or facilities:

   a. Storm water associated with industrial activities, as defined in Title 40, Code of Federal Regulations, Sections 122.26(b)(14)(i) through 122.26(b)(14)(ix) and 122.26(b)(14)(xi).

   b. Storm water associated with construction activities, including clearing, grading, and excavation, that result in the disturbance of equal to or greater than one (1) acre of total land area. The total land area includes a contiguous area where multiple separate and distinct construction activities may be taking place at different times on different schedules under a larger common plan of development or sale. **An NPDES permit is required before the start of the construction activities.**

   c. Treated effluent from leaking underground storage tank remedial activities.

   d. Hydrotesting water.

   e. Construction site dewatering effluent.

   f. Vehicles wash area(s).

   g. Small Municipal Separate Storm Sewer System.

   For certain types of discharges into Class A or Class 2 State waters, CCH-DTS may apply for NPDES general permit coverage by submitting a Notice of Intent (NOI) form. The CCH-DTS must submit a separate NOI form for each type of discharge at least 30 days prior to the start of the discharge activity, except when applying for coverage for discharges of storm water associated with construction activity. For this type of discharge, the NOI must be submitted 30 days before to the start of construction activities. The NOI forms may be picked up at our office or downloaded from our website at:
   http://www.hawaii.gov/health/environmental/water/cleanwater/forms/genl-index.html

4. The CCH-DTS must also submit a copy of the NOI or NPDES permit application to the State Department of Land and Natural Resources, State Historic Preservation Division (SHPD), or demonstrate to the satisfaction of the CWB that SHPD has or is in the process of evaluating your project. CCH-DTS should submit a copy of their request for review by SHPD or SHPD's determination letter for the project along with CCH's NOI or NPDES permit application, as applicable.

5. The adequacy of the statement (Page No. 4-134 of DEIS) "[M]ost of the guideway, stations, and transit facilities are planned within roadway corridors and in non-wetland area. Therefore, no direct impacts to wetlands are expected for any of the Build Alternatives" and the statement (Page No. 4-135) that "[B]ecause no impact to wetlands are expected, no mitigation is expected to be required," needs to be re-evaluated. (Emphasis added)

   a. The DEIS needs to discuss in details whether wetlands exist within the project construction and operation limits. There was no discussion on potential impacts to wetlands in the Water Resources Technical Report. Limited discussion regarding wetlands' presence is located in Item No. 4 of the "Natural resources Technical Report" and Page Nos. 4-128 and 4-130 of the DEIS. The potential indirect impact to the "spring-fed" wetland system in Kalauao adjacent to a segment of the project (and is currently used by the Sumida Watercress Farm) is identified in the DEIS.

   b. Page No. 4-21 of the August 15, 2008 "Natural Resources Technical Report" indicated that Field investigation of wetlands along the proposed alignment was conducted in December 2007 and January 2008. But, there is no indication of whether a wetlands delineation was performed. Wetlands delineation and wetlands function shall be properly identified and mitigation measures proposed if adverse impacts to wetlands are "**unavoidable**." We acknowledge that Page No. 4-128 of the DEIS did indicate that "[I]f mitigation is required for fill placed in the wetlands, the project must comply with *Compensatory Mitigation for Losses of Aquatic Resources Final Rules*." However, under this situation, the CWB prefers to have the on-site compensatory mitigation measures that will address wetlands function replacement and acreage loss.

6. For water pollution control purposes, DEIS and associated technical reports should also include an assessment of potential adverse impacts to the quality of receiving State waters resulting from the construction site(s) storm water discharges (either directly or indirectly) into and construction activities within the State waters including perennial streams, intermittent streams, gulches, ditches, nature drainage ways, etc.

7. Prior to DOH's establishment of Total Daily Maximum Loads (TMDL) for CWA, Subsection 303(d) listed water bodies, discussion is needed on what types of Best Management Practices (BMPs) measures will be implemented during the project construction and operations period to ensure that there will be "**no net increase of loadings of pollutants of concerns**" for each of the listed streams, estuaries and embayments.

   We note that Page No. 4-1 of the "Water Resources Technical Report," identified that many of the streams within the construction corridor are listed by the DOH as impaired water bodies under CWA, Subsection 303(d). Item No. 2.1.3 (Page No. 2-4) of the same report also indicated that "during the design phase of each section of the project area, a Permanent BMPs Technical Manual will be produced."

8. An Applicable Monitoring and Assessment Plan (AMAP) shall be properly established and implemented to adequately monitor and assess potential project construction related Short-term impacts and operations related long-term impacts.

   An AMAP shall be properly designed and implemented to ensure the adequacy of the implemented BMPs measures and to demonstrate that the project construction and operations related activities do not cause applicable water quality criteria to be violated in the receiving State waters.

   An AMAP should be developed using the Data Quality Objectives (DQO) planning process and include Quality Assurance (QA) and Quality Control (QC) methods to be used. The purpose and goal of the DQO process can be found at http://www.hanford.gov/dqo.

9. The CCH-DTS shall be informed that all discharges related to the project construction or operation activities, whether or not NPDES permit coverage and/or Section 401 WQC are required, must comply with the applicable State's Water Quality Standards. Noncompliance with water quality requirements contained in HAR, Chapter 11-54, and/or permitting requirements, specified in HAR, Chapter 11-55, may be subject to penalties of $25,000 per day per violation.

If you have any questions, please visit our website at http://www.hawaii.gov/health/environmental/water/cleanwater/index.html, or contact Mr. Ed Chen of the Engineering Section, CWB, at 586-4309.

Hazard Evaluation and Emergency Response Office (HEER)

The route of the fixed guide-way rail system goes through agricultural and industrial areas where soil contamination may be encountered during excavations for the system's construction. It is appropriate to conduct Phase I investigations of those properties with the potential for chemical contamination, and Phase II studies when necessary. This includes businesses associated with

automotive repair (oil and solvents), dry cleaning (chlorinated solvents), petroleum and petroleum products refining and storage (gasoline, diesel and other products), pesticide mixing and storage facilities (metals, dioxins, chlorinated pesticides/herbicides), etc.

A major component of potential contamination is the array of pipelines in the Iwilei District. There are also extensive areas of known contamination along Dillingham Boulevard and the rest of the Honolulu Harbor area. Great care should be taken when excavating along this route. Coordination with the HEER Office is imperative. The appropriate contact for the Iwilei District is Anna Fernandez. She can be reached through the HEER Office at 586-4249.

In summary, the City and its contractors should be in direct contact with the HEER Office to locate properties along the route already in the HEER Database. All Phase I reports, sampling plans, and Phase II reports should be reviewed by the HEER Office. Please call Richard Palmer at 586-0957 if you have any questions regarding the comments.

Indoor and Radiological Health Branch

Project activities shall comply with the Administrative Rules of the Department of Health, Chapter 11-46, Community Noise Control

Should there be any questions, please contact Russell S. Takata, Environmental Health Program Manager, Indoor and Radiological Health Branch, at 586-4701.

Built Environmental Working Group

The Hawaii Department of Health Built Environment Working Group (BEWG) is comprised of 20 representatives from 12 divisions within the Department holding as its overarching goal cross-programmatic collaboration. By implementing this approach, we intend to improve the health and safety of Hawaii residents through the promotion of healthy community design policies and practices.

Based on our review of the Honolulu High Capacity Transit Corridor EIS Review, the following are a listing of our recommendations and comments:

Recommendations:

Transit User Benefits Section: Recommendation is to include the health benefits of utilizing transit. (Summarized by Katie M. Heinrich, Ph.D.)

- Over time, physical activity levels have declined due to increased reliance on time-saving devices, and reduced physical demands of work, housework, and travel. This has created an energy imbalance (consuming more calories than are expended) resulting in higher obesity rates.[1] Rail transit has the potential for increasing physical activity, since most

trips begin and end with walking.[2-3] As compared to people who do not use public transit, those using rail walk an additional 10.5 more minutes per day,[4] with 1/3 of American transit users walking the recommended 30 minutes per day.[2] Even small increases in physical activity, such as a brisk walk of 15-20 minutes, help expend up to 100 calories per day, potentially attenuating weight gain for 90% of the population.[4] By construction, light rail stops involve greater distance than bus stop, inviting more walking, and one round-trip rail commute involves an average of 4 walking trips each day.[5] Rail use can also result in public health cost savings (e.g., $12.6 million over 9 years for 9100 residents in Charlotte, NC;[1] or $4800-$6600 per person each year nationally[4]), development rights around rail stations and rights of way, increased land values, lower rates of injury and death, reductions in vehicular accident costs, reductions in air pollution, increased access to care, stress reductions, and reduced traffic congestion.[1,2,4] It is imperative that the design of areas around and to rail stations is a collaborative effort between health, housing, transportation, and environmental advocates in order to create an attractive built environment that supports walking to destinations for everyday activities.[3,5]

References

1. Stokes RJ, MacDonald J, Ridgeway G. Estimating the effects of light rail transit on health care costs. *Health Place* 2008;14:45-58.
2. Besser LM, Dannenberg AL. Walking to public transit: steps to help meet physical activity recommendations. *Am J Prev Med* 2005;29(4):273-280.
3. Li F, Harmer PA, Cardinal BJ, Bosworth M, Acock A, Johnson-Shelton D, Moore JM. Built environment, adiposity, and physical activity in adults aged 50-75. *Am J Prev Med* 2008;35(1):38-46.
4. Edwards RD. Public transit, obesity, and medical costs: assessing the magnitudes. *Prev Med* 2008;46:14-21.
5. Brown BB, Werner CM. A new rail stop: tracking moderate physical activity bouts and ridership. *Am J Prev Med* 2007;33(4):306-309.

Chapter 2, Page 2-20 states that it is "envisioned" that bicycles will be allowed on trains. Recommendation would be to plan for bikes to be allowed on trains as well as in the design of the transit stations. Light rail vehicles can be equipped with interior bike racks as achieved in other states. Visit http://www.vta.org/services/bikes.html#bikes_on_buses for additional information.

Chapter 3, Page 3-35 explains that each guideway vehicle would be designed to accommodate bicycles in "off peak hours". It is recommended that guideway vehicles be designed to accommodate bicycles at all times. The MOST important time to accommodate bicycles would be during peak hours.

It also states that several stations would be located at existing or planned bicycle facilities. Recommendation would be for all stations to have bike facilities. Bike stations that are installed

at transit stops provide transit users a safe, and secure location to store bikes. It can also provide opportunities for bike share and rentals, bike repair and encourages users who may travel longer distances to utilize transit knowing their bikes could be stored at the station. Visit http://www.bikestation.org/.

As mentioned on **pages 3-43 to 3-44**, allowing bikes on trains, as currently envisioned, would create a demand for bicycle lanes or routes near stations. Recommendation would be to plan for access and connections for bicycles to and from transit stations preferably as marked bike lanes or routes.

The discussion of existing bicycle and pedestrian facilities **(3.2.5)** does not mention that the bicycle facilities are also "sometimes narrow or not continuous" as they do mention for the pedestrian facilities. Please include this language in reference to bicyclists as well.

Chapter 4, page 4-93 states that "new vegetation" will be provided whenever trees must be displaced. Recommend that such vegetation should include the planting of new trees whenever feasible and as appropriate.

On visual impacts (Chapter 4), recommend providing visual simulations of the rail system between Halekauwila St. and Ala Moana Center. The height of the rail system is the issue. The Halekauwila St. intersection simulation looks like it runs 20 feet above grade, but does the height increase once it reaches Ala Moana Center? Also, any visual shots to show the project's effects on existing mountain-to-ocean view corridors, like Piikoi St. and Ward Ave, would be welcome.

Comments:

We appreciate the City Department of Transportation Services' willingness to coordinate with the City Department of Planning and Permitting TOD initiative, and that they will ask communities for input on station design elements. We recommend that:

- Each community along the proposed route have a sense of ownership of their neighborhood station
- Public outreach should continue throughout the design and construction phases, especially with regard to environmental justice areas

If the Airport route is chosen over the Salt Lake and combinatioo options, recommend the DEIS provide more discussion on its connectivity with feeder bus routes.

- Based on Chapters 3 and 7, the Airport route appears to have higher ridership, need for fewer parcel acquisitions, fewer acres converted to transportation usage, and would be built on level, less hilly terrain.

- The Airport route seems to be slightly less cost-effective than the Salt Lake option. However, the small difference appears to be made up by increased ridership.

Linkages between the train stops and local resources should be made apparent (e.g., schools, shopping, parks). Recommend these linkages be provided through visual simulation or GIS mapping.

Please call Heidi Smith at 586-4495 if have any questing regarding these recommendations and comments

General

We strongly recommend that you review all of the Standard Comments on our website: www.hawaii.gov/health/environmental/env-planning/landuse/landuse.html. Any comments specifically applicable to this project be adhered to.

If there are any questions about these comments please contact Jiacai Liu with the Environmental Planning Office at 586-4346.

Sincerely,

KELVIN H. SUNADA, MANAGER
Environmental Planning Office

c: Barry Fukunaga, Governor's Office
DDEH
OEQC
WWB
CWB
HEER
IRH
BEWG
EPO

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT2/09-298461R

Mr. Kelvin H. Sunada, Manager
Environmental Planning Office
Department of Health
State of Hawaii
P.O. Box 3378
Honolulu, Hawaii 96801-3378

Dear Mr. Sunada:

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

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

Wastewater from the maintenance and storage facility is discussed in Section 4.17.2, in this Final EIS. Domestic and non-domestic wastewaters (but not including stormwater runoff) would be connected to the existing City and County of Honolulu public sewer system.

As discussed in 4.14.3 of the Final EIS, pollution prevention BMPs, such as regular inspection and cleaning of the drainage system, will need to be a part of the stormwater management plan that will be developed during Final Design. Stormwater runoff from the developed area of the site will be collected through an on-site drainage system consisting of catch basins, swales, and underground perforated pipe systems to direct runoff to a stormwater detention basin located on-site.

As discussed in Section 4.14.1, Background and Methodology [Water], in this Final EIS, the Project will comply with the anti-degradation policy, applicable designated uses, and water quality criteria. The water quality and waters permits required for the Project are noted in Table 4-40, List of Anticipated Permits, and discussed in Sections 4.14 and 4.21, in this Final EIS and include CWA Section 401 water quality certification, CWA Section 404 permit for impacts to jurisdictional waters of the U.S. and National Pollutant Discharge Elimination System permits.

The Project is designed to minimize the number of streams that will require work in waters of the U.S. under the jurisdiction of the USACE. On September 15, 2009, the Army Corps of Engineers stated that its substantive concerns relating to Section 404 of the Clean Waters Act had been addressed and that the scope and intensity of impacts to jurisdictional waters of the United States are now relatively minor due to the extent of avoidance and minimization of impacts on the aquatic environment resulting from project site selection and design. There will be impacts to waters of the U.S by the Project. Transit guideway support columns will be placed in Waiawa, Moanalua, and Nuuanu Streams. In addition, the Project will be widening the existing Dillingham Boulevard Bridge at Kapalama Stream which will require extension of the existing piers and abutments. The total permanent impacts from structural elements of the Project is 0.02 acres. An existing stormwater outfall in Waiawa Springs will be extended at the Pearl Highlands Station to reduce ponding (total impact is 0.06 acres). For all work in waters of the U.S., the City will apply for USACE Section 404 nationwide permits for impacts to waters under the jurisdiction of the Corps where impacts could not be avoided. See Section 4.14.3 for details.

Section 4.18.10 identifies the types of temporary construction phase impacts from the Project on water resources. Section 4.18.10 also identifies the specific stormwater best management practices (BMPs) that will be employed by the construction contractor to protect the quality of State waters.

In addition, the discussion of permanent BMPs has been revised in Section 4.14.3, in this Final EIS. Permanent BMPs addressing stormwater runoff and water quality for the park-and-ride lots and the maintenance and storage facility will be prepared during design. The permanent storm water BMPs will be designed, installed, and maintained in accordance with the criteria and guidelines described in the State's Storm Water Permanent Best Management Practices Manual. Types and sizes of permanent storm water BMPs will depend upon the runoff quality and water quality requirements of each receiving water body.

Further, when the Project applies for the CWA Section 401 Water Quality Certification, an Applicable Monitoring and Assessment Plan will be established.

The information provided on water quality is noted. The Project will comply with applicable State Water Quality Standards and permitting requirements. As stated in Section 4.21 Anticipated Permits, Approvals, and Agreements and Table 4-40 that summarizes permits, certificates, and/or approvals anticipated to be required for implementation of the Project.

Potential subsurface impacts at sites of concern identified in Section 4.12, Hazardous Waste and Materials, and listed in Table 4-22 in this Final EIS, have been analyzed.

Construction in these areas is planned to begin in the next few years and construction in these areas will be conducted in phases over time. Figure 2-42 in this Final EIS shows the anticipated Project Schedule. As construction approaches, the Project will coordinate with the Hazard Evaluation and Emergency Response Office (HEER) regarding these areas. In addition, contractors will be required to prepare plans, as outlined in Section 4.18.7, in this Final EIS, to address the potential of contaminated subsurface material.

The Project has coordinated with the HEER and will continue to do so. HEER will be given the opportunity to review the Phase I Environmental Site Assessment and other studies through ongoing coordination with the Project.

The information provided regarding the health benefits of transit is noted.

Bicycles will be allowed on transit vehicles as regulated by a bicycle policy that will be developed. In addition, the Project is coordinating with City and State agencies to encourage development of enhanced bicycle facilities near stations, but the actual construction of such facilities is beyond the scope of the Project.

Section 2.5.5, Pedestrian and Bicycle Access, in this Final EIS, provides information about pedestrian and bicycle access to stations. Stations will be designed to encourage and accommodate pedestrian and bicycle access.

The suggested language, "Bicycle facilities are often narrow and not continuous", has been added to Section 3.3.5, Existing Bicycle and Pedestrian Network Conditions and Performance, in this Final EIS.

Section 4.13.3, Environmental Consequences and Mitigation, of the Draft EIS states that, "effects to trees would be mitigated by transplanting existing trees or planting new ones." Section 4.15, Street Trees, in this Final EIS presents additional information on the Project's affect on street trees, and provides specific environmental commitments regarding street trees.

Visual simulations between Halekauwila Street and Ala Moana Center are shown on Figures 4-13 through 4-20 of the Draft EIS. The guideway height at the Halekauwila Street intersection is about 45 feet, and it is about 80 feet at the Ala Moana Center Station. Additional simulations at Ward and Piikoi Streets are provided in Section 4.8.3, Environmental Consequences and Mitigation [Visual and Aesthetic Conditions], in this Final EIS.

The City and County of Honolulu is conducting workshops with communities that will have rail stations. The purpose of the workshops is to engage the public about rail stations and give opportunities for residents to contribute ideas about the appearance of the station in their area. Ideas generated at the workshops will be incorporated into the station planning and design process. For more information and to get involved in this process, please visit the Project website at www.honolulutransit.org.

Public outreach, including environmental justice areas, will continue throughout the Project development process.

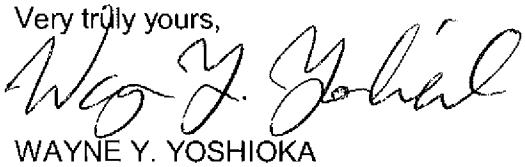
Information about feeder bus routes for the preferred alternative (Airport Alternative) is located in Appendix D, Bus Transit Routes, of this Final EIS.

The Airport Alternative would have higher ridership than the Salt Lake Alternative. As a result, this alternative will also be more effective in reducing vehicle miles traveled and vehicle hours traveled. The selection process for the Airport Alternative as the preferred alternative is described in Section 2.4, Preferred Alternative Identification Process, in this Final EIS. As stated in Chapter 7, Evaluation of the Project, in this Final EIS, there are other benefits associated with the Airport Alternative, including less land conversion and fewer property acquisitions and displacements.

The City is familiar with of the standard comments for environmental impact statements developed by the Environmental Planning Office and will comply with those applicable to the Project.

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

Very truly yours,



WAYNE Y. YOSHIOKA
Director

Enclosure

From: Kealoha, Katherine P. [mailto:Katherine.Kealoha@doh.hawaii.gov]
Sent: Monday, December 08, 2008 6:13 PM
To: Roberts, Stephanie L
Subject: DEIS Comments

Aloha Stephanie:

Attached are the initial comments from OEQC, can you please give me call after you have reviewed them?
My numbers are 586-4185 and 265-1796.

Thanks so much! Aloha- Kathy

1. Relationship of the Proposed Action to Land Use Plans, Policies and Controls for the affected area.

Please expound on the paragraph on page 4-164. In accordance with Section 11-200-17(h), Hawai'i Administrative Rules, please discuss if there are any conflicts or inconsistencies in the proposed project. If so, please discuss the reasons that you plan to proceed notwithstanding the absence of full reconciliation.

In Section 4.17.10 on page 4-164, pursuant to Section 11-200-17(j), Hawai'i Administrative Rules, please discuss the extent to which the proposed project would foreclose future options and the extent to which the proposed project would narrow the range of beneficial uses of the environment or pose long-term risks to health and safety.

2. Status of Necessary Approvals

Table 4-37 on page 4-176 presents the list of necessary approvals. Pursuant to Section 11-200-17(h), Hawai'i Administrative Rules, please also indicate the status of each approval.

3. Resources – Irreversible and Irretrievable Commitments

In Section 4.19 on page 4-175, pursuant to Section 11-200-17(k), Hawai'i Administrative Rules, please expound on the existing text by considering "resources" only as "energy, construction materials, and labor." The rule notes that "resources" also means natural and cultural resources committed to loss or destruction by the action.

4. Recommendation – Summary Table of Probable Unavoidable Adverse Environmental Effects

Section 11-200-17(l), Hawai'i Administrative Rules states in pertinent part that "[t]he draft EIS shall address all probable adverse environmental effects which cannot be avoided. It would be helpful if the EIS included a table summarizing these unavoidable probable adverse environmental effects

5. Mitigation of Hazardous Materials or Wastes, Potential Toxic Tort Liability Issues

Pursuant to Section 11-200-17(m), Hawai'i Administrative Rules, with respect to mitigation for impacts from hazardous materials and/or wastes, Section 4.11, on page 4-113, notes that the City would perform partial or complete Phase I Site Assessments in accordance with American Society for Testing and Materials protocol E1527-05. Please discuss what measures the City would take with respect to remediation and/or removal of the offending hazardous materials or wastes contamination prior to property acquisition.

6. Mitigation in General

With respect to mitigation measures in general, please discuss measures to reduce significant, unavoidable, adverse impacts to insignificant levels and the basis for considering these levels acceptable. Also, where a particular mitigation measure has been chosen from among several alternative mitigation measures, please discuss each alternative measure and disclose the reasons for choosing a particular one. Please discuss the timing of each step in any mitigation process. Please disclose what performance bonds (if any) may be posted, as well as provisions proposed to assure that the mitigation measures will be taken.

7. Summary of Unresolved Issues with Discussion

Pursuant to Section 11-200-17(p), Hawai'i Administrative Rules, please include in a separate and distinct section in the EIS that summarizes unresolved issues and contains either a discussion of how such issues will be resolved prior to commencement of the action, or what overriding reasons there are for proceeding without resolving the problems.

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010 RT10/09-337643R

Ms. Katherine Kealoha
Office of Environmental Quality Control
Department of Health
State of Hawaii
235 South Beretania Street, Suite 702
Honolulu, Hawaii 96813

Dear Ms. Kealoha:

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

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

Relationship of the Proposed Action to Land Use Plans, Policies and Controls for the affected area

The statement in Section 4.1.3 of the Draft EIS, "The Build Alternatives would be consistent with adopted State and Local government transportation and land use policies." has been clarified in this Final EIS in Section 4.18.12, as follows, "The Project is consistent with the land use and transportation elements of plans, policies, and controls within the study corridor. The Project does not exclude future options, narrow the range of beneficial uses of the environment, or pose long-term risks to health and safety."

Status of Necessary Approvals

Section 4.21 in this Final EIS has an updated list of List of Anticipated Permits, Table 4-40. The status of the permits is included in this table.

Resources – Irreversible and Irretrievable Commitments

In this Final EIS, Section 4.20, Irreversible and Irretrievable Commitments of Resources, has been revised to include, "and impact natural and cultural resources."

Probable adverse environmental effects that cannot be avoided are included in Table 4-1, Summary of Direct Environmental Effects and Mitigation Measures to Avoid, Minimize, or Reduce Impacts, in this Final EIS for each of the environmental resources evaluated.

Mitigation of Hazardous Materials or Wastes, Potential Toxic Tort Liability Issues

As discussed in Section 4.12.3, Environmental Consequences and Mitigation [Hazardous Materials and Waste] of this Final EIS, either a partial or complete Phase I Environmental Site Assessment (ESA) will be performed by the City prior to acquiring portions of these properties. This effort will minimize the chance that the City will acquire a degraded piece of real estate or that workers will be exposed to contaminants during construction.

Specific pre-construction activities regarding contaminated media are discussed in Section 4.18.7 of this Final EIS. The nature of any future study would vary by area or site and would depend on the level of concern in each area.

Mitigation in General

Mitigation measures are presented in Chapter 4 and are summarized in Table 4-1 in this Final EIS. The mitigation measures in this Final EIS were developed based upon the potential impacts of the Project. Mitigation measures will be incorporated during design and construction of the Project. In the time between the Draft EIS and this Final EIS, there have been subsequent design efforts. The design team will continue to coordinate with the environmental team to further reduce impacts whenever possible.

Construction phasing is presented in Section 2.5.10, Project Phasing, in this Final EIS. The construction contractor is responsible for obtaining the necessary performance bonds.

Summary of Unresolved Issues with Discussion

A summary of unresolved issues is presented in Section 7.8 in this Final EIS.

Chapter 8 of the Draft EIS presents DTS' coordination with agencies, non-governmental groups, and the public throughout the planning process for the Project. For this Final EIS, comments and responses made on the Draft EIS are in Appendix A, Comments Received on the Draft EIS and Responses. The Final EIS was revised to incorporate changes where required in

response to comments received. A summary of changes between the Draft EIS and Final EIS is provided at the beginning of each chapter.

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

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

04/0080

LINDA LINGLE
GOVERNOR OF HAWAII

LAURA H. THIELEN
CHAIRPERSON
BOARD OF LAND AND NATURAL RESOURCES
COMMISSION ON WATER RESOURCE MANAGEMENT

RUSSELL Y. TSUJI
FIRST DEPUTY

KEN C. KAWAHARA
DEPUTY DIRECTOR - WATER

AQUATIC RESOURCES
BOATING AND OCEAN RECREATION
BUREAU OF CONVEYANCES
COMMISSION ON WATER RESOURCE MANAGEMENT
CONSERVATION AND COASTAL LANDS
CONSERVATION AND RESOURCES ENFORCEMENT
ENGINEERING
FORESTRY AND WILDLIFE
HISTORIC PRESERVATION
KAHOOLAWE ISLAND RESERVE COMMISSION
LAND
STATE PARKS

STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES

POST OFFICE BOX 621
HONOLULU, HAWAII 96809

February 2, 2009

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

Subject: Honolulu High Capacity Transit Corridor Project (City and County of Honolulu)
Draft Environmental Impact Statement/Section 4(f) Evaluation

Dear Mr. Yoshioka:

Thank you for the opportunity to review the above-referenced submittal received November 2008, regarding improved transportation equity in the corridor between Kapolei and the University of Hawai'i at Manoa on the island of Oahu. After review by the Department of Land and Natural Resources (DLNR), division comments have been compiled. The following is representative of the State Historic Preservation Division, the Commission on Water Resource Management and Division of Aquatic Resources, the Division of Engineering, Land Management, the Division of Forestry and Wildlife, and State Parks.

I. Historic Preservation

The State Historic Preservation Division (SHPD) disagrees with the Federal Transit Administration (FTA) that this project will have "no adverse effect" on known and potentially unknown historic properties, potential burial sites, cultural landscapes and traditional cultural properties. The FTA's determination has the potential to eradicate over 80 potentially eligible known sites and overlooks impacts existing viewplanes in Ewa, Chinatown and to individual properties. Additionally, the SHPD has concerns about the treatment of potential burials and archaeological sites, including cultural layers that may be found during the archaeological inventory phase. To date the State Historic Preservation Officer has not concurred the FTA's determination.

A. Architecture: The Architecture Branch provides documents on the draft Historic Resources Technical Report on September 26, 2008 (2008.3762/0809AL44). On December 17, 2008, the SHPD Architecture Branch participated in a workshop

regarding effect determinations for the proposed Transit Corridor project as part of ongoing Section 106 consultation under the National Historic Preservation Act alongside representatives from Parsons Brinckerhoff (PB), the City and County of Honolulu's Department of Transportation Services, Historic Hawai'i Foundation, and the National Trust for Historic Preservation. A total of 83 architectural resources within the area of potential effect have been determined eligible for nomination to the National Register of Historic Places. PB staff presented a finding of adverse effect for a total of seven properties: Solmirin House; Afuso House; Higa Fourplex; Teixeria House; Kamani Trees (Dillingham Blvd.); Dillingham Transportation Building; and the Boulevard Saimin property. A finding of no historic properties affected or no adverse effect was presented for the remaining 76 properties located along the corridor.

SHPD Architecture Branch has expressed concern over these preliminary determinations on a number of points. First, a finding of no historic properties affected implies that no historic properties are present in the area of potential effect or that the undertaking will have no effect as defined in 36 CFR Part 800.16(i). However, it appears that FTA has only affected the project's direct affects and has not taken into account the indirect affects of the project on historic resources. For example, the raised guideway may impede customary viewplanes, changes to the scale and character of the setting, or transit based development around stations may have long-term impacts to the historic resource.

SHPD believes that visual effect must be given greater consideration where it concerns impacts to integrity of setting, feeling, and association. For example, the indirect effects of guidway crossings on Nu'uanu Stream Bridge and Hono'uli'uli Stream Bridge. Other resources that deserve additional consideration for indirect impacts per 36 CFR Part 800.5(a)(2)(v), include the 'Aiea (Honolulu Plantation) Cemetery, Tong Fat Wood Tenement Buildings, Aloha Tower, OR & L Depot, Mother Waldron Park, Walker Park, Irwin Park, and the Aloha Chapel. SHPD suggested that simulations be developed to analyze the character of visual and atmospheric effects and parcel takings to this and other individual resources. Adverse effects are not confined to direct impacts to a parcel and can include cumulative and far-reaching impacts to historic resources as provoked by the Project, including proposed transit based development around transit stations.

The above should also be duly re-considered in regards to constructive use determinations under Section 4(f) of the Department of Transportation Act. Per 23 CFR Part 774.15(a), as published in the Federal Register Vol., 73, No. 49 (March 12, 2008): "A constructive use occurs when the transportation project does not incorporate land from a Section 4(f) property, but the project's proximity impacts are so severe that the protected activities, features, or attributes that qualify the property for protection under Section 4(f) are substantially impaired." Impairments include noise level increase, obstruction or elimination of primary views, restriction of

access, vibration impacts, etc. Table 5-2 cites *de minimis* findings for direct use determination under Section 4(f) for the six Quonset hut grouping along Dillingham Boulevard, Chinatown historic district (see below), Hawaiian Electric, Radford High School, and Pearl Harbor National Historic Landmark (see below). These determinations are still pending.

Regarding the Chinatown historic district, listed on the National Register of Historic Places on January 17, 1973, SHPD expressed specific concerns. The district nomination records the following description:

> "The boundaries of the district, as established by the Hawai'i Historic Places Review Board, are as follows: a 50 ft. line on the *'ewa* (north) side of Nu'uanu Stream, the *mauka* (east) side of Beretania Street, a line 50 ft. from the building line on the Diamond Head (south) side of Nu'uanu Avenue, and 50 ft. *makai* (west) of the longest pier stretching into Honolulu Harbor. The major reason for its early development and continuous history as a commercial area was due to the close proximity to Honolulu Harbor."

Under statement of significance, the nomination reads:

> "Throughout the whole of its 180 years as a trading center in the Pacific, Honolulu has always been closely identified with its harbor--the principal channel of contact with the outside world. It is, however, that portion of Honolulu immediately adjacent to the harbor at the mouth of Nu'uanu Stream which holds the longest continuous history of native and immigrant settlement and where the story of Hawai'i's common folk has been most compactly unfolded (...)"

As the intimate connection between the architectural district and the waterfront are called out as character-defining features of the National Register nomination, SHPD has significant concerns regarding a determination of no adverse effect to the district.

SHPD Architecture is in receipt of the FTA's December 11, 2008 letter inviting consultation with the Secretary of the Interior regarding potential adverse effect to the Pearl Harbor National Historic Landmark. SHPD looks forward to continuing consultation regarding this site. We are in receipt of the Historic Hawai'i Foundation's (HHF) December 10, 2008 letter which raises questions regarding the inadequacy of the description given in the Draft EIS to the vital significance of the National Historic Landmark.

Moreover, in reference to the above-named correspondence, please verify that the resources of the former Naval Air Station Barber's Point and lands west of the West Loch station were omitted because they will be fully consulted on in a separate Draft EIS at a later time. As referenced by HHF, discussion of the resources associated

with former Marine Corps Air Station 'Ewa Field should parallel the import of the newly designated Valor in the Pacific National Monument.

Discussion of effect determinations and the above-named points is scheduled to continue with consulting parties. SHPD Architecture participated in a driving tour of the proposed route (Airport alternative) with PB staff and the Historic Hawai'i Foundation on January 9. We will resume discussion of draft mitigation commitments following closer concurrence on effect determinations. Regarding Table 4-5, "Acquisitions and Displacements Summary," please provide an itemized list of how many parcel acquisitions and displacements by land use impact eligible historic resources. Finally, please note that National Register criteria considerations D and G are not cited regarding methodology. Federal Transit Administration has not yet completed its review for effect determinations pending our office's response to individual eligibility determinations.

B. Archaeology: The Area of Proposed Effect (APE) was divided into 10 different sub-areas to evaluate below-ground effects. The proposed project covers the fundable twenty-mile segment of the corridor between East Kapolei and the Ala Moana Center with alternatives for both Fixed Guideway Transit Alternatives of the Salt Lake and Airport routes. The project does affect potential human burials, subsurface features and cultural deposits that have not yet previously been identified. We agree that once column locations are identified archaeological inventory work would focus on these locations and if historic properties are identified then mitigation plans should include archaeological monitoring, possible archaeological data recovery and burial treatment plans. SHPD participating in on-going 106 consultation on a Programmatic Agreement to address the above issues.

C. Culture and History: SHPD Culture and History Branch concurs that the transit project as a whole will change the character of the physical features within the corridor (36CFR 800.5). SHPD is specifically concerned about the affect view planes from traditional lookout points such as Makakilo and Pu'u Kapolei. As stated in our September 26, 2008 correspondence: "Furthermore, we were encouraged that at our meeting it was indicated that indirect impacts to landscape and setting, including view sheds *makai* to *mauka*, will be examined to determine the broader impact of the corridor itself. We believe that this macroscopic dimension will aid in accurately reflecting the comprehensive effect of the proposed project and in turn facilitate identification of appropriate mitigation." Other examples of character changing impacts would include those to landscapes such as the Banana Patch community, Sumida Watercress Farm and Aiea Plantation Cemetery. At the same time, we do recognize and appreciate that some modifications to the alignment have been made specifically to minimize adverse effect.

The Oahu Island Burial Council (OIBC), Hui Malama I Na Kapono, and Office of Hawaiian Affairs have been consulted, as stipulated in the National Historic Preservation Act, Section

106. OIBC at their January 14, 2009, meeting summarized their consultation work with HTA but seemed to be only addressing the Programmatic Agreement concerns and not the Draft EIS or relevant studies. We will defer their comments on the Draft EIS at this time.

We understand that a Memorandum of Agreement is being developed to address the concerns of the Architecture and a Programmatic Agreement is being developed to address Archaeology and Cultural/History respectively. Also, please note that the Advisory Council on Historic Preservation, National Park Service, and the National Trust for Historic Preservation were not listed as consulting parties in the Draft EIS.

We have not reviewed the *Honolulu High Capacity Transit Corridor Project Archaeological Resources Technical Report*. In a separate transmittal shortly forthcoming, the SHPD will comment in more detail regarding the findings of the technical report. We look forward to the Archaeological Inventory Survey Plan (Phase I) which will be done by the construction phases, along with an Archaeological Inventory Survey Report(s) and an Archaeological Monitoring Plan.

If there are any questions, please contact Pua Aiu, SHPD Administrator, at 692-8015.

II. Aquatics and Water Resource Management

The proposed Honolulu High-Capacity Transit Corridor Route will cross the following streams: Honouliuli, Waikele, Kapakahi, Kalo'i Gulch, Waiawa, Waimalu, Kalauao, Aiea, Halawa, Moanalua, Kalihi, Kapalama, and Nu'uanu which all empty into the Pacific Ocean along the southern coast of the island of Oahu. All these streams are perennial except for Kapakahi and Kalo'i Gulch which are non-perennial. The Division of Aquatic Resources (DAR) has conducted many biological surveys in Waikele, Waiawa, Halawa, Moanalua, Kalihi, and Nu'uanu streams and has observed native macrofauna. The estuarine, lower and middle reaches native macrofauna which may be impacted by the transit corridor include native fish species such as *Stenogobius hawaiiensis, Eleotris sandwicensis, Mugil cephalus, Kuhlia xenura, Kuhlia sandvicensis*, and the native freshwater crustacean, *Macrobrachium grandimanus*. Other native macrofauna which migrate to the upper reaches would also be impacted during their migration through this corridor. Impacts on the native macrofauna and other aquatic resources can be minimized by avoiding any work in the stream channels or along banks. Impacts on the nearshore reefs and fauna would also be minimized by not disturbing the stream channels or banks and addressing heavy rainfall runoff from this project.

Additionally, the following mitigative measures should be implemented during the construction of the fixed rail transit system and associated areas to minimize the potential for erosion, siltation and pollution of the aquatic environment include:

1. Lands denuded of vegetation should be planted or covered as quickly as possible to prevent erosion;

2. Scheduling site work (particularly the excavation and grading) during periods of minimal rainfall;
3. Use to silt fences or other means to prevent sediments from entering the stream; and
4. Preventing construction materials, petroleum products, debris and landscaping products from falling, blowing or leaching into the aquatic environment.

We recommend the use of best management practices (BMP) for stormwater management to minimize the impact of the project to the existing area's hydrology while maintaining on-site infiltration and preventing polluted runoff from storm events. Stormwater management BMP's may earn credit toward LEED certification. More information on stormwater BMPs can be found at http://hawaii.gov/dbedt/czm/initative/lid.php.

There may be the potential for ground or surface water degredation/contamination and we recommend that approvals for this project be conditioned upon a review by the State Department of Health and the developer's acceptance of any resulting requirements related to water quality.

A Stream Channel Alterantion Permit is required by CWRM before any alteration(s) can be made to the bed and/or banks of a stream channel. The planned source of water for this project has not been identified in the Draft EIS report, therefore, we cannot determine what permits or petitions are required from our office, or whether there are potential impacts to water resources.

We recommend that the Final EIS disclose projected potable and non-potable water demands associated with the project, including indirect and cumulative effects such as the City and County's proposed transit oriented development that will surround the rail system. We also recommend that the proposed sources to meet these demands be identified.

If there are any questions, please contact Ken Kawahara, Water Deputy, at 587-0214.

III. Engineering

DLNR, Engineering Division, has reviewed the subject document, and have no comments at this time regarding flood zone(s) traversed by proposed project alignment. However, we do have the following general comments:

1. Column construction in streams will likely trigger comments related to aquatic habitat and biological/environmental issues. Response to these issues would have to be prepared.
2. As required by the City and County of Honolulu's Flood Plain Management Ordinance, any construction planned in a Flood Zone designated as AE (Floodway) will require a detailed floodway study and/or no risk certification.
3. A Conditional Letter of Map Revision (CLOMR) is required if there are any changes in water level (44 CFR 65.12).

4. Note that FEMA is conducting a Flood Insurance Risk Study that will update approximately 60 miles (Kaena Point to Kawailoa Point) of coastal flood hazard boundaries. Preliminary study results have been issued to the City and County of Honolulu, Department of Planning and Permitting.

Please note that the project site must comply with the rules and regulations of the National Flood Insurance Program (NFIP) presented in Title 44 of the Code of Federal Regulations (44CFR), whenever development within a Special Flood Hazard Area is undertaken. Please be advised that 44CFR indicates the minimum standards set forth by the NFIP. Your Community's local flood ordinance may prove to be more restrictive and thus take precedence over the minimum NFIP standards.

If there are any questions, please contact Eric Hirano, Engineering Administer, at 587-0230.

IV. Land

Among the lands owned and managed by DLNR are two parcels in East Kapolei, Ewa, Hawai'i, located west of the proposed North-South Road alignment and mauka and makai of Farrington Highway. The two parcels are identified by Tax Map Key Numbers (1) 9-1-17:86; and 9-1-18:05 (the "DLNR Parcels"). These parcels have excellent long-term development potential, and DLNR has accordingly identified these parcels as future income producing lands to support DLNR's operations and maintenance/management of the State's public lands and natural and cultural resources. DLNR has also communicated its desire to the City and County of Honolulu (the "City") to have these parcels rezoned to allow for commercial and/or other income-producing uses.

Various sections, figures, and tables in the Draft EIS provide for the fixed guideway alignment and a park-and-ride facility to be located within the DLNR Parcels, e.g., Figures 2-2, 2-3, 2-4, 2-5, 2-15, 2-38, 2-44, 4-3, Table 2-6, Appendix A. However, it is not clear whether these parcels are included among the properties identified by the City for acquisition (see Section 4.3 and Table 4-5) and whether compensation will be paid for any such acquisition.

The conveyance of any easement or other rights over the DLNR Parcels to allow such facilities, and the amount of compensation to be paid for such easement/rights, if any, requires the approval of the Board of Land and Natural Resources (BLNR). As of the date of this memorandum, BLNR has not granted any such approval, and therefore, BLNR's approval should be added to the list of Anticipated Permits and Approvals required for the proposed project (Table 4-37). It should also be noted, however, that DLNR has had prior discussions with the City regarding use of portions of the DLNR Parcels for the proposed transit project and DLNR's desire to rezone the DLNR parcels, and DLNR intends to continue to work with the City on these issues.

We understand that either route proposed in the Draft EIS invovles some State Lands managed by other State agencies or entities. In most cases, these State Lands have been set aside to the government agency for a specific purpose, pursuant to Section 171-11, HRS. Any uses deviated from the specific purposes in the set aside require approval from the Governor and the BLNR.

The State is currently prohibited from conveying any portion of ceded lands due to a Hawai'i Supreme Court decision dated January 31, 2008. If any proposed acquistion of property requires fee title conveyance of the ceded lands, the outcome of the appeal filed by the State to the US Supreme Court may affect the final design of the project.

For future easy reference, it may be helpful if the Final EIS contains a table on the acquisition with information on ownership and current uses on the affected properties.

If there are any questions, please contact Morris Atta, Land Administrator, at 587-0456.

V. Forestry and Wildlife

According to comments submitted September 15, 2008, the Division of Forestry and Wildlife (DOFAW) stated that on Page S-1 – *Abutilon* is mentioned as "threatened," but it is actually listed as "endangered" according to State and Federal law. DOFAW would like to provide the following for your consideration.

The existing State Department of Transportation Habitat Conservation Plan (HCP) for *Abutilon*, covers only a limited geographic area related to North-South road (DOT), Kapolei Parkway, University of Hawaii West Oahu, DHHL right-of-entry and subdivision, and DLNR future development plans (pgs 9-18). Additional DHHL lands are included under a Certificate of Inclusion registered with the Land Court. The City and County of Honolulu land ownership was identified in the original HCP (pg 9) and a Certificate of Inclusion issued for a portion of their lands. However, the current HCP does not include all affected lands or current planned activities within the rail transit corridor (see attached Table 3. Landownership of Parcels at Kapolei Properties). Activities and lands within the HCP area can be included by an additional Certificate of Inclusion, but activities outside the HCP area will need an amendment or new HCP.

Mitigation activities should address increased fire management measures. Although the current HCP includes a fire management strategy, it does not take the proposed project into consideration, so it does not address fire concerns for the project under review. The project under review could create new threats to the *Abutilon* reserve, with concern of discarded cigarettes or equipment sparks for example.

The level of fire management identified in the current HCP includes:

"A fire management strategy consisting for the following measures is being implemented to ensure that the plants are not accidentally destroyed.

- Identification of fire fighting resources available near the Kapolei population;
- Provide information to fire stations to assist them in protecting *A. menziesii* from fire;
- Identification of water resources near the Kapolei population.

The details of the fire management strategies are described in the Final Interim Management Report for *Abutilon menziesii* (DLNR DOFAW 2003, Appendix G)." (p. 21).

If additional plants are discovered outside the boundaries of the lands covered under the current HCP, then the transit corridor will need a new Habitat Conservation Plan (see attached information on HCP and ITL) or an amendment to the existing HCP. Additionally, should a plant survey of the transit corridor show no endangered plants in the Kapolei-Ewa area, it does not constitute a finding of no plants present because plants can emerge following rainfall or scarification. Therefore, it is recommended that multiple surveys are done and that the biology of endangered flora and fauna be considered, especially that of the *Abutilon*.

The issue of invasive species is not addressed in the Honolulu High-Capacity Transit Draft EIS. The implementation of this project creates risks related to the introduction of new harmful invasive species, weeds or pests that could be brought into Oahu by importation of heavy equipment and materials sourced from sites off island, be it from other islands or continental locations. For example the red imported fire ant is a serious pest in a number of southern and coastal states including: CA, TX, NC, AR, NM, DE, and in other areas around the world. Recent economic input analysis indicated that if established in Hawai'i, the estimated negative impacts to Hawai'i's economy could be as high as $200 million within 20 years and it would affect our way of life and human health. Apart from the potential introductions from out-of-state import risks are the intra-state risks between islands. A number of pests are present on other islands in Hawai'i but not present or are under control on Oahu, e.g. miconia, little fire ant and coqui frogs. Appropriate mitigation would involve implementing prevention measures, paying close attention to pests at the site of origin for incoming equipment and materials, cleaning, inspections and treatment both before shipping and after arrival on Oahu would reduce these risks significantly.

The Draft EIS describes plans for the planting of trees and other landscaping projects. Nursery plants sourced from outer islands are a known pathway for "hitchhiker pests," and should be subject to inspections and appropriate treatment. Also, the plants that are considered for planting could themselves become harmful invaders or contribute to existing problems, if not screened properly. Species under consideration for planting should be reviewed using the University of Hawai'i, Weed Risk Assessment system that allows high-risk potentially harmful species to be identified, while low risk alternatives could be a more suitable species selected for this project.

The subject project Draft EIS did not address tree removal plans, or lack there of, in the rail transit corridor. If tree removal is part of the construction process, there is concern in central Honolulu in the Kapiolani Blvd. area where a population of white tern, *Gygis alba* or Manu-o-kū, is known to nest.

Further mitigation could involve implementing pre and post construction surveys to determine what plant species are present along the transit pathway and remove any potentially invasive species as a post construction mitigation action. If the prevention mitigation measures mentioned above are implemented successfully, this latter problem will likely be minor or insignificant.

If there are any questions, please contact Paul Conry, DOFAW Administer, at 587-4182.

VI. State Parks

The subject project Draft EIS does not acknowledge the transit corridors alignment near State Parks, and the impacts it may have on those areas.

Section 5.4.1 of the Draft EIS states that the project will require direct property acquisition of several recreational areas, one of which is Ke'ehi Lagoon Beach Park, resulting in a section 4(f) use. Directly adjacent to the beach park is the Hawai'i Disabled American Veteran's (DAV) Keehi Lagoon Memorial that was set aside to the department and is operated and maintained by the Hawai'i DAV. Its location may place it near the alignment for both the Airport and Salt Lake alternatives, however, there is no mention of it in the document.

We also note that Aiea Bay State Recreation Area, also under our jurisidiction and a section 4(f) area, was discussed in the Draft EIS and determined to have no use based on the criteria for review of 4(f) properties. There is concern that the criteria used to make this determination is unclear.

If there are any questions, please contact Dan Quinn, State Parks Administrator, at 587-0292.

Thank you for the opportunity to submit comments.

Sincerely,

Laura H. Thielen, Chairperson
Department of Land and Natural Resources

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TRANSPORTATION SERVICES

c: Mr. Ted Matley, FTA Region IX

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WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT2/09-297860R

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

Dear Chair Thielen:

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

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

Historic Preservation

Preliminary effect determinations documented in the Draft EIS were refined in the Historic Effects Report: Honolulu High-Capacity Transit Corridor Project (RTD 2009d) issued by FTA on April 14, 2009. This report analyzes the project's direct, indirect, and cumulative impacts to historic properties. Consultation with the SHPD has continued since release of the Draft EIS with regard to these effect determinations. FTA has accepted adverse effect determinations on the National Historic Landmark and Chinatown Historic District as well as other historic resources. The eligibility, effect determinations, and Section 106 consultation are documented in Section 4.16, Archaeological, Cultural, and Historic Resources, of this Final EIS.

Naval Air Station Barbers Point is not included in the Project's APE because the Kapolei Extension is not part of the current Project; no further analysis of the Kapolei Extension will be conducted at this time. If the Kapolei Extension is considered and studied in the future, potential impacts to historic resources identified in this area would be addressed at that time.

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

Visual impacts to the settings of historic resources were addressed in Historic Effects Report: Honolulu High-Capacity Transit Corridor Project (April 14, 2009d). In addition, Section 4.8 of this Final EIS includes the visual impact analysis of the Project. Figures and simulations that were included in the Honolulu High-Capacity Transit Corridor Project Visual and Aesthetics Resources Technical Report (RTD 2008e) and were utilized in the preparation of the Draft EIS have been copied into the FEIS to clarify the information from previous studies. Commenters on view effects are representative of the various viewer groups that have been considered in the visual and aesthetic conditions analysis presented in the Draft EIS and this Final EIS. Inclusion of the viewer group's responses, received during the Draft EIS comment period, resulted in refinement of the visual impact evaluation which resulted in revised ratings from moderate to significant for Views 12, 14, and 15 in the Downtown area as described in the Final EIS. The visual impact rating was refined to reflect the bulk and scale of the station as well as the other elements noted in the Draft EIS. The Draft EIS described several types of visual effects, and the refinements in this Final EIS reflect the same visual effects identified in the Draft EIS. The Draft EIS and this Final EIS concluded that changes to some views, including protected views and vistas, would be unavoidable, and the refinements confirmed this conclusion.

View planes from traditional look out points such as Puu Kapolei and Puu Makakilo were considered in the analysis of the Project as documented Honolulu High-Capacity Transit Corridor Project Visual and Aesthetics Resources Technical Report (RTD 2008e). The Draft and Final EIS acknowledge that the visual changes from the Project will likely be less obtrusive and minimal in wider vistas or regional panoramic views, such as from traditional look out points where the project elements serve as smaller components of the larger landscape. The project elements would not be dominant features in these views.

Mitigation measures to minimize visual effects of the Project and enhance the visual and aesthetic opportunities will be incorporated into the Project during final design as discussed in Section 4.8.3 of this Final EIS. Although mitigation measures will minimize many adverse visual effects by providing visual buffers and reducing visual contrasts between the Project elements and their surroundings, the Final EIS acknowledges, as concluded in the Draft EIS, that probable unavoidable adverse effects, such as view blockage, cannot be mitigated and will be significant (noted as a "High" level of visual impact in the Draft EIS) in some areas.

Chapter 5 of this Final EIS, Section 4(f) Evaluation, discusses the historic resources identified in Section 4.16 of this document. The Section 4(f) evaluation includes a discussion of the direct use, including de minimis use where the historic resources will not be adversely affected as described in 36 CFR Section 880.5 (Section 5.5.2 of this Final EIS). An evaluation

of the constructive use at the historic resources where the Section 106 process has resulted in an adverse effect and where the Project will not result in a direct use was completed. The Project will not restrict any access to historic resources, will have no adverse noise and vibration impacts (per FTA standards), and result in no ecological intrusions at these Section 4 (f) resources. Therefore, only visual impacts that substantially impair the historic value were considered for the Section 4(f) historic resources. This evaluation concludes that there will be no use of Section 4(f) resources since the Project will not substantially impact the features or attributes of the historic resources that contribute to NRHP eligibility (Section 5.6.3 of this Final EIS).

There may be potential impacts to previously identified or unknown archaeological resources during construction. As described in Section 4.18.11, Archaeological, Cultural, and Historic Resources [Construction Phase Effects], in this Final EIS, prior to construction, the Project will investigate the potential for subsurface deposits within the column locations and will mitigate during construction. SHPD will be consulted throughout the process.

The Oahu Island Burial Council, Hui Malama I Na Kupuna O Hawaii Nei, and the Office of Hawaiian Affairs are included in the list of Section 106 Consulting Parties as documented in Section 4.16, in this Final EIS.

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

Aquatics and Water Resource Management

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

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

Permanent and temporary (during construction) best management practices (BMPs) will be implemented to minimize the potential impacts to the aquatic environment as discussed in Section 4.14.3, Environmental Consequences and Mitigation [Water], in this Final EIS. Examples of Permanent BMPs include, but are not limited to bioretention areas, vegetated buffer strips, dry swales, water quality basin, and structural BMPs with oil/water separators. Section 4.18.10 Water Resources [Construction Phase Effects], in this Final EIS discusses BMP for in-water construction activities.

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

Because of the construction schedule and difficulty in anticipating water events, DTS cannot entirely avoid construction during rainfall; however, BMP will be employed to minimize impacts associated with construction stormwater flow.

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

Permanent and temporary (construction-related) BMPs will be implemented for the park-and-ride lots and vehicle maintenance and storage yards to maintain on-site infiltration and prevent polluted runoff from entering streams and near shore waters. An integral part of the permanent BMPs is the inspection and maintenance plan to ensure that they operate as designed.

The Clean Water Branch of the State Department of Health has provided comment on the Draft EIS. Through the individual Section 401 Water Quality Permit, the Clean Water Branch of the State Department of Health will ensure compliance with the State's antidegradation policy (HAR, Section 11-54-1.1). Section 4.21, Anticipated Permits, Approvals and Agreements, has a list of Anticipated Permits in this Final EIS including a Stream Channel Alteration permit from the Department of Land & Natural Resources (DLNR), Commission on Water Resource Management.

Use of water during construction will include but not be limited to concrete mixing, dust management, and establishing landscape elements. It is anticipated the contractor will use non-potable water, where practicable, to construct the elevated guideway structures or utilize other construction methods to conserve water. Once the Project is operational, it is anticipated that non-potable water will also be used where practicable for landscaping and vehicle maintenance. Landscaping will use vegetation that requires minimal watering. The maintenance and storage facility will pursue Leadership in LEED Certification. This includes the use of sustainable practices and reduction of the use of resources which may include water and energy.

Permanent use of potable water is anticipated to be limited to station operations and maintenance operations restroom facilities. As discussed in Section 4.19.3 of the Final EIS, additional potable water supplies will be required to support the increase in population and

employment as well as restrooms mentioned above. The Project is not anticipated to be a major water consumer.

As described above, streams affected by structural elements of the Project are Waiawa Stream and Springs, Moanalua Stream, Kapalama Canal Stream, and Nuuanu Stream. Section 4.18.10, Water Resources [Construction Phase Effects], details the types of temporary construction phase impacts and mitigation measures. The City will obtain the required permits from Federal and State agencies as listed in Section 4.21 of this Final EIS. During the processing for these permits, any further aquatic and biological/environmental issues will be assessed and mitigation measures finalized as part of the permit process.

In Section 4.14.3 of the Final EIS, it states: As a linear feature, the guideway will cross several floodplains in Waipahu and Pearl Highlands. However, the Project will not cause significant floodplain encroachment as defined by USDOT Order 5650.2. The guideway and many stations will be elevated above the floodplain by piers; but some facilities, such as stairs, elevators, and traction power substations, will have to be built at ground level. These features could have minor effects on floodplains, depending on how and where they are placed within a floodplain see figures in this section. However, any such changes caused by the Project will be mitigated through design to comply with current floodzone regulations. There will be no notable adverse impacts on natural and beneficial floodplain values, and there will be no impact to water levels in flood zones.

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

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

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

Land Use

Comments regarding DLNR's development plans for land parcels are noted. Coordination by the City's Right-of-Way staff and DLNR is continuing.

The parcels that will be acquired for the Project are presented in and Appendix C of this Final EIS. This Appendix includes tables of the property acquisition by tax number and general land use. The City will continue to coordinate with DLNR regarding the use or transfer of any DLNR lands. The City will comply with Section 171-11, HRS, regarding the use of State Lands.

Ecosystems

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

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

Fire Management Plans, including worker education, access maintenance, designated smoking areas, identification of fire fighting resources, and other requirements, are being reviewed for other projects in the area and will be incorporated into the Project.

Prior to construction in the Kapolei-Ewa area, the construction area outside the HCP will be surveyed for existing Abutilon plants. If any are found, a new HCP will be prepared or the existing HCP will be amended.

The Project contract documents describe the requirements for construction equipment or material imported to Oahu from the mainland, neighbor islands, or foreign countries, be free of dirt, vegetative matter, and animals. Construction equipment will have to be washed before being brought to the Project site. On-site workers will be trained to recognize common invasive species growing in the construction area. The use of native (indigenous and endemic) and proven adapted species is encouraged. Criteria for cleaning, inspection, and treatment of plants that are at risk of harboring pests are included in the mitigation described in Section 4.18.9 of the Final EIS.

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

Section 4.13.3, Environmental Consequences and Mitigation [Ecosystems], in this Final EIS discusses tree removal and specifically addresses the white tern. White terns select the largest high canopy trees for roosting and nesting. The pruning and removal of these trees are not expected to affect the white tern population because there are numerous other large canopy trees in the urban area of Honolulu that will not be affected by the Project and that could be used by the white terns.

Section 4(f) Resources

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

Section 5.5.1, Park and Recreational Resources,] of the Final EIS presents the Section 4(f) evaluation of Keehi Lagoon Beach Park. Coordination with the City Department of Parks and Recreation will continue during final design and construction. Project design was intended to avoid impacts to the Hawaii Disabled American Veteran's Memorial, and the Project impact at Keehi Lagoon Park does not affect the Memorial.

Section 5.6.1, Park and Recreational Resources, [Evaluation of Constructive Use of Section 4(f) Resources] of the Final EIS presents a constructive use analysis in accordance with 23 CFR 774.15. Aiea Bay State Recreation Area was evaluated in the same Section. The analysis presented in the Final EIS concluded, "...the elevated guideway would be located mauka of the park, within the median of the adjacent highway and as a result, will not obstruct makai views. There will be no noise or vibration impacts from the Project...and features will not be substantially impaired, the Project will not result in a constructive use of the resource."

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

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

LINDA LINGLE
GOVERNOR

BRENNON T. MORIOKA
DIRECTOR

Deputy Directors
MICHAEL D. FORMBY
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IN REPLY REFER TO:

STP 8.3074

STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION
869 PUNCHBOWL STREET
HONOLULU, HAWAII 96813-5097

January 29, 2009

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

Dear Mr. Yoshioka;

Subject: Honolulu High Capacity Transit Corridor Project Draft Environmental Impact Statement (DEIS) and/Section 4(f) Evaluation

Thank you for providing the subject document for review and comments.

The State Department of Transportation (DOT) understands that the subject DEIS discusses a project by the City and County of Honolulu, Department of Transportation Services (DTS), for the development of a High Capacity Transit Corridor Project ("Project") that would provide a fixed guideway transit service on Oahu in a travel corridor between Kapolei, with potential expansion to the University of Hawaii at Manoa (UH Manoa) and Waikiki.

Four alternatives are identified via a series of screening and scoping studies. This DEIS evaluates those four alternatives:

1. No Build Alternative
2. Fixed Guideway Transit Alternative via Salt Lake Boulevard (Salt Lake Alternative)
3. Fixed Guideway Transit Alternative via the Airport (Airport Alternative)
4. Fixed Guideway Transit Alternative via the Airport and Salt Lake Boulevard (Airport & Salt Lake Alternative)

The Locally Preferred Alternative selected by the Honolulu City Council includes a fixed guideway transit system from East Kapolei to Ala Moana Center and planned extensions to West Kapolei, UH Manoa and Waikiki. The system would use steel-wheel-on-steel-rail technology and all parts of the system would either be elevated or in exclusive right-of-ways. The Project also requires the construction of transit stations and supporting facilities. Further, some city bus services will be reconfigured to align with the proposed transit stations.

The Project will generate significant impacts to DOT airports, highways and harbor facilities. The fixed guideway rail system should be viewed as part of a comprehensive, multi- and inter-modal transportation system. This requires early, continuous, direct coordination and careful design and construction planning with the DOT. The Project requires connectivity with other transportation and transit systems as well as all other means of transportation used by commuters and travelers such as, but not limited to, buses, taxis, shuttles, service vans, motorcycles, scooters, bicycles and walking. The Project must be carefully integrated within the existing systems and enable travelers' transfers between these systems. DOT therefore recommends that these linkages and public use patterns for all modes of travel (i.e. bus, bike, pedestrian, etc.) be further analyzed. DOT is particularly interested in the evaluations, findings and recommendations at the sites where DOT facilities are located.

The following comments are from the DOT's three modal divisions, who should be consulted during the Project's planning, design and construction phases for their concerns for impacts to right-of-ways, easements, real property and infrastructure.

AIRPORTS

The two airport alternatives will impact the airport system. DOT requests that DTS contact the Airports Division Planning Section at (808) 838-8810 and address the following issues:

1. The Airports Division understands that the Airport Alternative involves two stations on the Honolulu International Airport (HNL) property on Aolele Street. One is next to the new parking structure and the other is at Lagoon Drive.

2. The station adjacent to the new parking structure will be connected to the structure. Clear signage is necessary for rider's access of the other airport terminal buildings. There are several operational and engineering issues related to a transit station located near an Airport terminal in relative proximity of airport operational areas (AOA). DTS should meet with Airports staff and the Airports modernization team to address the rail station's location, its impact on airport operations and future airport improvements.

3. To ensure that the Lagoon Drive station meets the Federal Aviation Administration (FAA) FAA Part 77 obstruction height limits for the end of Runway 22R, DTS should submit a FAA Form 7460-1, Notice of Proposed Construction or Alteration, to the FAA.

4. DTS should also meet with the Transportation Security Administration (TSA) to review any security issues or requirements for the rail stations at HNL.

HARBORS

The project will generate impacts to the harbors system, particularly where the transit stations are adjacent to Honolulu Harbor. DOT requests that DTS address the following comments and initiate or continue coordination with the Harbors Division Planning Section at (808) 587-1888.

1. Page 2-32. The DOT understands that the rail system interfaces with Nimitz Highway in the area between the Pier 15 area and past the HECO power station area. Figures 2-33 and 2-34 show the two stations in this area. The stations appear to avoid conflicts with the entrances to Harbors' major shipping terminals.

    a. DOT requests consideration for a station located at the Aloha Tower complex to provide direct access to the complex and to downtown Honolulu via Fort Street. If this location is given consideration, then Harbors Division is willing to discuss options for redeveloping its current office building into a combination parking structure and transit station, subject to the need to satisfy the community's concern regarding the image and appearance of downtown Honolulu and Nimitz Highway as a pathway to Waikiki.

    b. Given the importance of this section of Nimitz Highway to the waterfront area and to downtown Honolulu, additional study is needed to ensure proper siting of a transfer station. Proper placement is critical for minimizing impacts to the harbor area, the highway system and the Aloha Tower complex, and also for maintaining waterfront access, pedestrian safety, a desirable visual and spatial atmosphere and the proper aesthetics for downtown Honolulu. DTS should consult with DOT and the downtown stakeholders on the location of this transit station.

2. Page 3-14. Please note that Kewalo Basin is DOT Harbors third Oahu harbor but is soon to be transferred to the Hawaii Community Development Authority (HCDA). Charter Boat operations as mentioned in the document occur at this harbor and not at Honolulu or Kalaeloa Barbers Point Harbor.

3. Page 3-14. Ocean Recreation is not an activity of DOT's commercial harbor system. Ocean Recreation is under the jurisdiction of the DLNR – Division of Boating and Ocean Recreation.

4. Page 3-14. Trucks carrying freight enter Honolulu Harbor through Nimitz Highway and also Ala Moana Boulevard (at Fort Armstrong). The roadway fronting Fort Armstrong is Ala Moana Boulevard and not Nimitz Highway.

5. Page 3-14. Please also include Kalihi Street in the discussion of freight movement. Eastbound container trucks utilize Kalihi Street to get onto Interstate Route H-1.

6. Page 3-44. The correct name for Oahu's second harbor is Kalaeloa Barbers Point Harbor. It is noted as Barbers Point Harbor on this page and elsewhere.

7. Page 3-48. It is noted that alternative routes may be required as an impact of the construction of the improvements. Any improvement required to facilitate alternative routes (turning radius, etc.) should be the responsibility of the Project as a mitigation measure.

8. Page 4-61. Kewalo Basin should also be included in the discussion of the makai edge.

9. Page 4-171. There is no "Kalaeloa Harbor 2020 Master Plan" or "Honolulu Harbor 2020 Master Plan". The Oahu Commercial Harbors 2020 Master Plan incorporates both Honolulu and Kalaeloa Barbers Point Harbors.

HIGHWAYS

DOT also confirms that there will be impacts to the highway system. At a significant number of locations, the rail line, transit stations and other Project support facilities will be functionally adjacent to, physically abut or transect highway system roadways and right-of-ways. The transit-oriented development (TOD) within the communities around the rail stations will also impact the highways system. DOT requests that DTS address the following comments and initiate or continue coordination with the Highways Division Planning Branch at (808) 587-1830.

1. Chapter 3 various pages. Planning horizon of 2030 is used throughout the document. Standard practice is 20 years after construction completion. With a construction completion in 2018, the planning horizon should be 2038.

2. Page 4-98 3rd paragraph. The reference, "The State of Hawaii regulates community noise pollution through HAR 11-16," is incorrect. The correct reference is HAR 11-46. In addition, Hawaii's noise levels are more restrictive than the Federal levels and the project needs to conform to both requirements. HAR 11-46-4 has maximum permissible sound levels in dBA (dBA defined as the A-weighted sound level or unit of measurement describing the total sound level of all noise as measured with a sound level meter using the "A" weighting network). The following is the maximum level.

	Day time (7am–10pm)	Night time (10pm–7am)
Class A	55	45
Class B	60	50
Class C	70	70

Class A includes all areas equivalent to land zoned residential, conservation, preservation, public space, open space, or similar type.

Class B includes all areas equivalent to lands zoned for multi-family dwellings, apartment, business, commercial, hotel, resort, or similar type.

Class C includes all areas equivalent to lands zoned agriculture, country, industrial, or similar type.

3. Kamehameha Highway Improvements – Waihona Street to Center Drive. DTS should coordinate Project work with improvements to this area.

4. Design Criteria. DOT Highways requests all streetscape improvements by DTS utilize DOT Highway standard drawings, details and specifications. Particularly, as follows:

   a. A visual picture record of assets within the highway right-of-way prior to construction shall be made by DTS and approved by DOT's Highway Landscape Architect for restoration afterwards. In general, all landscaping shall be restored to its original condition after construction is complete. DTS should provide As-built drawings in the form of both full size drawings and electronic files of all work within the highway right-of-way.

   b. Work within the highway right-of-way shall employ DOT Highway standard Invasive Species Management specifications and Tree Protection zone construction detail. All transplantable trees as determined by DOT to be removed by construction shall be transplanted at DTS' expense to another State right-of-way site approved by DOT's Highway Landscape Architect.

   c. DTS shall not move relocated utilities under DOT sidewalks and should consult with DOT for exceptions. New utility boxes shall be screened by landscaping or placed in underground vaults.

   d. The handling of the anticipated additional trash in between stations needs further explanation.

   e. All median underneath the rail shall be low maintenance rockscape or decorative paving with limited, shade tolerant plantings at intersections.

   f. New plantings shall be non-invasive plants as defined by the Hawaii Chapter of the American Society of Landscape Architects. DTS shall employ native plants where they are the best choice for the conditions.

g. The design of the rail should include measures to limit bird nesting and perches that produce bird droppings.

5. Construction Criteria.

a. During construction, DTS shall maintain all landscaped areas to DOT Highway standards utilizing DOT maintenance specifications including mowing, edging and trimming, weeding, pruning and care of shrubs and trees, fertilizing, pesticide and herbicides, clearing gutters, swales and ditches, invasive plant removal and rubbish and debris removal and disposal.

b. DTS shall be responsible for maintaining all irrigation impacted during construction and provide watering as necessary. All site furnishings that are removed during construction including but not limited to traffic signal poles and heads, irrigation controllers and valves, backflow preventers, fence fabric and utility boxes shall be delivered at DTS' expense to the DOT Highways Oahu District Baseyard or disposed of at DTS' expense if DOT does not desire to keep the items.

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

a. In recognition of Farrington Highway as the main street of Waipahu, DOT spent $4 million dollars in 2002 for a main street revitalization project. In 2005, the project received the Betty Crocker Landscape Award from the Scenic Hawaii organization.

"This project sponsored by the State Department of Transportation helped transform a bleak, lifeless, uninviting part of Farrington Highway for motorists. The result is landscaping effort that quickly changed the area and which will continue to improve..."

b. DOT's interaction with the Waipahu community has been overwhelming positive and the improvements to Farrington Highway have contributed to a greater sense of pride and renewal in the community. As a result, adjacent properties have been improved and new businesses have moved in along the highway.

c. Since the Project is going to remove these significant improvements to Waipahu's main street and add a rail structure further affecting the aesthetics, DOT requests DTS consult with DOT and the Waipahu stakeholders to provide equitable improvements to the sidewalks to include material sidewalk improvements, street trees, site furnishings and undergrounding of overhead utilities.

d. All existing median trees to be removed by Project construction shall be transplanted at DTS' expense to another State right-of-way site approved by DOT's Highway Landscape Architect.

7. Kamehameha Highway - Interstate Route H-1 to Aloha Stadium. Kamehameha Highway is the main street for two communities; Aiea and Pearl City. Since 2005, DOT has worked with the Aiea and Pearl City communities through an extensive public involvement process to identify improvements to this main street. Through this process, the community and DOT agreed to improvements that were suspended pending the outcome of rail. This Project installs a rail structure to the area, which could negatively impact the area aesthetics. Therefore, DOT requests the that DTS consult with DOT and the Aiea and Pearl City stakeholders to provide equitable improvements to the sidewalks, such as material sidewalk improvements, street trees, site furnishings, enhancement of areas around Sumida Watercress farms and undergrounding of overhead utilities.

8. Nimitz Highway - Nuuanu Stream Bridge to Halekauwila Boulevard.

   a. Nimitz Highway from Nuuanu Stream Bridge to Halekauwila Boulevard abuts the downtown central business district waterfront and some of the most valuable real estate in the State of Hawaii. It is also the point of arrival for all cruise ship visitors to Oahu. Additionally, Hawaii Tourism Authority's research indicates over 80% of Oahu visitors' first impression of Hawaii is driving from the Airport to Waikiki via Nimitz Highway. For over 20 years, the downtown community has explored means to relocate the HECO power plant that detracts from this valuable waterfront area. The addition of a rail structure and station located near the HECO power plant will require further study of the Nimitz Highway corridor and a careful analysis of impacts to the Aloha Tower complex and adjacent harbor facilities. Also, care must be taken to maintain pedestrian safety as well as to avoid creating a less than desirable visual and spatial atmosphere for visitors and residents moving through this area. The aesthetics, image and appearance of downtown Honolulu are areas of great concern to the community. Therefore, DOT requests DTS consult with DOT and downtown stakeholders on this matter and to provide equitable improvements to the sidewalks including material sidewalk improvements, street trees and site furnishings.

   b. Recognizing the importance of this stretch of Nimitz Highway, in 2008 DOT installed plantings of coconut palms. As such, all existing median trees to be removed by Project construction shall be transplanted at DTS' expense to another state right-of-way site approved by DOT's Highway Landscape Architect.

DOT appreciates the opportunity to provide comments. Given the anticipated and potential impacts to multiple DOT facilities, it would be beneficial to have DTS make periodic presentations to DOT as part of the on-going Project planning and coordination with DOT.

Presentations should cover issues such as the Project task list and timeline, coordination for design and construction phasing, environmental issues and mitigation measures and physical impacts to and integration with DOT airport, harbors and highway systems. Further, these meetings should include all or combinations of the modal divisions based on the particular subject matter or area and location being discussed.

If there are any questions regarding all three modal divisions of DOT, please contact Mr. David Shimokawa of the DOT Statewide Transportation Planning Office at (808) 587-2356.

Very truly yours,

BRENNON T. MORIOKA, PH.D., P.E.
Director of Transportation

c: Mr. Abraham Wong, Federal Highway Administration
Mr. Ted Matley, Federal Transit Administration
Ms. Katherine Kealoha, Office of Environmental Quality Control

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT2/09-297850R

Honorable Brennon T. Morioka, Ph.D., Director
Department of Transportation
State of Hawaii
869 Punchbowl Street
Honolulu, Hawaii 96813-5097

Dear Mr. Morioka:

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

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

Airports

1. As stated in your letter, there are two stations proposed for Honolulu International Airport property. One station is next to the recently constructed parking garage and one at Lagoon Drive. The specific station locations are shown in Appendix B to the Final EIS. Project staff has and will continue to coordinate with HDOT Airports Division Planning staff.

2. DTS will continue to coordinate with HDOT Airports Division Planning staff, specifically on the connection between the rail station and airport terminals. Signage and wayfinding are being addressed in the station design process.

3. DTS has consulted with FAA and HDOT Airports Division during preparation of the Final EIS. The design included in the Final EIS meets the requirements of these agencies. FAA Form 7460-1 will be submitted to the Federal Aviation Administration at the appropriate time, which is about 2 years prior to construction. This has been added to the list of permits and approvals in Section 4.21 of the Final EIS.

4. DTS has consulted with the Transportation Security Administration (TSA) regarding security requirements and will continue to coordinate with TSA throughout design, construction, and implementation of the Project to ensure that security requirements and concerns are addressed.

Harbors

1. Your comment regarding the interface between the Project and Nimitz Highway is noted.

a. Thank you for being amenable to locating a station in your building. Station locations were selected in part to minimize negative effects and geometric challenges (such as building on a curve) and maximize opportunities to serve the community and promote ridership. The Downtown Station location was selected for Nimitz Highway between Alakea and Bishop Streets because it was the best location from a geometric design perspective and allowed the station to serve the center of town effectively.

b. The identified location for the Downtown Station emphasizes pedestrian safety by connecting the mauka and makai sides of Nimitz Highway with a concourse, thus providing access to the waterfront, Aloha Tower Marketplace, and Downtown destinations. Alternative Downtown Station locations were evaluated in Chapter 5 of the Final EIS.

As stated in Section 2.5.5 of the Final EIS, design criteria developed for Project stations place highest emphasis on walk and bicycle access. Pedestrian access to stations, including accessible routes, shall be given first priority for safety reasons. The design criteria also state that, as a non-motorized mode, bicycles will be given second priority.

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

3. In response to your comment, text in Section 3.3.3 of the Final EIS has been revised as follows: "Ocean transportation, shipbuilding and repair, commercial fishing, ocean recreation (as operated by the Division of Land and Natural Resources), and other support industries are the main activities in Oahu's commercial harbors."

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

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

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

7. In the Final EIS (Section 3.5.7), a Maintenance of Traffic Plan and Transit Mitigation Program will identify measures to mitigate temporary construction-related effects on transportation. These plans and programs will be developed by the construction contractor for each phase, approved by the City, and coordinated with and approved by HDOT for those segments in HDOT highways.

8. The affected environment discussion referenced by the comment is found under the Kalihi to Ala Moana Center Landscape Unit heading in Section 4.8.2 of the Final EIS. The discussion mentions that the mountains and shoreline that define the mauka and makai edge of this landscape unit are dominant elements of the landscape. The Kewalo Basin is part of this landscape.

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

Highways

1. In 2005, the FTA provided guidance to RTD that a 2030 planning horizon could be used, provided that it is consistent with forecasts used by the local metropolitan planning organization (MPO). The planning horizon used for this project corresponds to that used by the Oahu Regional Transportation Plan developed by the OahuMPO. This provides consistency with the Island's long-range plan. 2030 was the longest comprehensive planning horizon existing in Honolulu at the time the Project was developed.

2. Our understanding is that HAR 11-46 regarding Community Noise Control is not intended to be used for transportation projects. As the purpose states: "It is the purpose of this chapter to define the maximum permissible sound levels, and to provide for the prevention, control, and abatement of noise pollution in the State from the following excessive noise sources: stationary noise sources; and equipment related to agricultural, construction, and industrial activities. It is also the purpose of this chapter to establish noise quality standards to protect public health and welfare, and to prevent the significant degradation of the environment and quality of life."

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

4. DTS has developed specifications and design criteria to address the City and County of Honolulu's architecture and landscape architecture requirements for the Project, including stations. Where appropriate, the City will use the applicable DOT Highway standards.

a. Landscape plans for work performed on State Highways will be prepared and submitted to HDOT for review. Construction contractors will be required to maintain designated landscape areas in accordance with Hawaii Standard Specifications,

Section 643—Maintenance of Existing Landscape Areas. Section 4.8.3 of the Final EIS provides a more detailed description of applicable design criteria.

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

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

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

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

e. For those areas of the Project in HDOT roadways, landscape plans, including those covering median areas, will be prepared and submitted to HDOT for review. This requirement has been added to Table 4-40 of the Final EIS.

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

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

5. Construction Criteria

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

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

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

a. Comments regarding the Farrington Highway improvements are noted.

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

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

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

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

8. (no title given)

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

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

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

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

DISABILITY AND COMMUNICATION ACCESS BOARD

919 Ala Moana Boulevard, Room 101 • Honolulu, Hawaii 96814
Ph. (808) 586-8121 (V/TDD) • Fax (808) 586-8129

November 24, 2008

The Honorable Wayne Y. Yoshioka
Director
Department of Transportation Services
City and County of Honolulu
650 South King Street
Third Floor
Honolulu, HI 96813

Dear Mr. Yoshioka,

The Disability and Communication Access Board was disappointed that a representative was unable to attend our Board meeting on November 20, 2008 to dialogue with Board members on the issue of accessibility for persons with disabilities in the proposed rail system. We understand that a representative may be able to attend the next Board meeting scheduled January 15, 2009 and we look forward to his or her attendance.

At our November 20, 2008 Board meeting, we used the opportunity to coalesce some of our concerns on accessibility and wish to relay them to you in advance of the January 2009 meeting in the hopes that you or your staff are better prepared to engage in a meaningful dialogue with our Board.

Our Board has strong concerns that the project meet not only the minimum guidelines for accessibility, as required by law, but also be functional, safe, comfortable and usable for people with disabilities. It has been our experience, unfortunately, that many projects consider accessibility to be an afterthought to the conceptual design. Community presentations on the rail system to-date, including visuals and schematic drawings, do not appear to reflect the population of people with disabilities as a consideration in planning and designing the project. For that reason we strongly urge you to include our Board and other people with disabilities in the earliest phases of conceptual design so as not to limit options because a project is too late to change when already in an advanced stage of design.

The following are some of our preliminary concerns:

1. Since the system is elevated, what is planned for vertical access at all stations? What is planned for the entire route from the Park and Ride onto the train itself?
2. How are you planning to incorporate people with disabilities in obtaining feedback?

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3. What access accommodations are planned for people with visual and hearing loss? Most of the time the emphasis is on mobility access only.

4. What is planned for maintenance, especially with elevators? Since the system is elevated, what will happen when the elevators do not work?

5. Will there be standardized criteria for all the stations since it appears that there may be different design consultants working on various stations?

Are you addressing program non-architectural issues as well (i.e., policies regarding assistance animals, emergency egress, audible station announcements, etc.)?

The Disability and Communication Access Board would like to know what information has been learned from other systems (BART in San Francisco, METRO in Washington, D.C.) in terms of access deficiencies and how to avoid them here.

We look forward to your attendance at our January 2009 Board meeting.

Should you have any questions, please feel free to contact Francine Wai, Executive Director at 586-8121.

Sincerely,

Charles W Fleming

CHARLES W. FLEMING
Chairperson

DEPARTMENT OF TRANSPORTATION SERVICES

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT12/08-290124R

Mr. Charles W. Fleming, Chairperson
Disability & Communication Access Board
State of Hawaii
919 Ala Moana Boulevard, Room 101
Honolulu, Hawaii 96814

Dear Mr. Fleming:

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

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

Project staff have continued to communicate with the Disability and Communication Access Board and provided an additional update to the Board regarding the Project's status and design aspects as the Project progresses into Final Design. Such communication will continue throughout the Project to enable the Board to comment on the Project's design.

Project staff members met with the Board at its January 19, 2009, meeting to discuss the contents of your letter. To reiterate information that was discussed with the Board:

1. *The transit system will be Americans with Disabilities Act (ADA) accessible. Elevators and escalators will be provided at all stations. In addition, level boarding will be provided to trains; therefore, stairs or lifts, as used on buses, will not be required to board the trains. Park-and-ride facilities will have handicapped spaces with ADA-compliant ramps and paths connecting the lots to the stations.*

In addition, sidewalks and bridges will be at least eight feet wide; pedestrian crossings will be signalized; and curb cuts will have tactile surfaces.

2. *The Project will continue to solicit opinion and comment from the disabled community and will continue outreach efforts to the disabled community as a whole. This includes individuals with disabilities and accessibility issues.*

3. *For riders who are blind or have low-vision, there will be texture changes in the pavement to identify important areas, including the edge of the platform. Braille and/or raised letter print and large print signage and verbal announcements will also be provided. For riders who are deaf/hard of hearing, directional, informational, and variable message signage will be provided at all stations.*

4. *The maintenance schedule for elevators and escalators, as with the maintenance schedule for transit vehicles, will be developed to provide reliable service.*

5. *There will be consistent standardized architectural design criteria for all stations. The design criteria will cover such issues as accessibility, signage, and ticketing.*

Lastly, system policies will consider input from the Board. While service animals will be allowed on trains, other animals, including comfort animals, will not be allowed per current policy with TheBus. Audible and visual information systems will be included in all stations. A project-specific Safety and Security Management Plan has been developed in accordance with FTA requirements. It defines the safety and surety activities and methods for identifying, evaluating, and resolving potential safety hazards and security vulnerabilities of these systems. The Honolulu Police Department, the Honolulu Fire Department, the Department of Emergency Management, and the Honolulu Emergency Services Department will continue to be involved in implementing the plan.

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

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

US

DISABILITY AND COMMUNICATION ACCESS BOARD

919 Ala Moana Boulevard, Room 101 • Honolulu, Hawaii 96814
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DEPT OF TRANSPORTATION SERVICES
CITY & COUNTY OF HONOLULU

February 6, 2009

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

Regarding: Honolulu High-Capacity Transit Corridor Project
Draft Environmental Impact Statement/Section 4(f) Evaluation
November 2008

Dear Mr. Yoshioka,

The Disability and Communication Access Board would like to thank you for the opportunity to review the Honolulu High-Capacity Transit Corridor Project Draft Environmental Impact Statement/Section 4(f) Evaluation dated November 2008. The purpose of this review is to ensure that this project will take into account accessibility design requirements for persons with disabilities.

With respect to the Final Environmental Impact Statement, we recommend the following general statement should be included in the EIS/Section 4(f) Evaluation:

> *"All buildings, facilities, and sites shall conform to applicable federal, state, and county accessibility guidelines and standards. Hawaii Revised Statutes §103-50 requires all State of Hawaii or County government buildings, facilities, and sites to be designed and constructed to conform to the Architectural Barriers Act/Americans with Disabilities Act Accessibility Guidelines (36 CFR Parts 1190 and 1191) issued by the U.S. Access Board, and other applicable design standards as adopted and amended by the Disability and Communication Access Board. The law further requires all plans and specifications prepared for the construction of State of Hawaii or County government buildings, facilities, and sites to be reviewed by the Disability and Communication Access Board for conformance to those guidelines and standards."*

The U.S. Department of Transportation, a major funding source for this project, has adopted and will enforce these design guidelines.

These comments are in addition to separate comments to your Department regarding the accessibility of the system (irrespective of the route taken) for persons with disabilities. The rail system will be a major transportation alternative for individuals with disabilities and it is critical that the design not only be minimally accessible to meet the requirements of the law but also take into account best practices for maximum usability and comfort to increase ridership.

Should you have any further questions, feel free to contact Mr. Curtis Motoyama, Facility Access Coordinator, or Mr. Gary Batcheller, Facility Access Specialist at 586-8121.

Sincerely,

Francine Wai

FRANCINE WAI
Executive Director

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT2/09-299178R

Ms. Francine Wai, Executive Director
Disability and Communication Access Board
State of Hawaii
919 Ala Moana Boulevard, Room 101
Honolulu, Hawaii 96814

Dear Ms. Wai:

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

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

The transit system will comply with Americans with Disabilities Act (ADA) regulations. The system operation plan considers and complies with all ADA requirements, including the noted requirements. The requested language regarding accessibility has been added to Section 2.5 of the Final EIS with minor modifications.

The City will continue to work with the Disability and Communication Access Board regarding accessibility issues.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this

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

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

HAWAII COMMUNITY DEVELOPMENT AUTHORITY

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TRANSPORTATION SERVICES
DIRECTOR'S OFFICE
09 FEB 2 A10:10
RECEIVED

Ref. No.: PL TRANS 7.18

January 29, 2009

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

Dear Mr. Yoshioka:

Re: Honolulu High-Capacity Transit Corridor Project Draft Environmental Impact Statement/Section 4(f) Evaluation

Thank you for the opportunity to review the Draft Environmental Impact Statement ("DEIS"), Section 4(f) Evaluation, relating to the Honolulu High-Capacity Transit Corridor Project. Please include our comments and your responses in the Final Environmental Impact Statement ("FEIS").

We have the following general comments to offer:

1. Due to the high level of Archaeological Resources Occurrence identified in Chapter 4, Figure 4-50 of the DEIS, we recommend that an Archeological Inventory Survey Plan and Survey be conducted for the proposed route of the Honolulu High-Capacity Transit Corridor Project within the Kakaako and Kalaeloa Community Development Districts. All study and documentation should be coordinated with the State Historic Preservation Office, Department of Land and Natural Resources, State of Hawaii.

2. We are concerned about the impact of the Project to the Queen Street Park as noted on page 5-15 of the DEIS. It appears that the straddle-bent columns would be located within the Mauka portion of the park. Public parks within the Kakaako Community Development District represent an important and scarce resource. We recommend alignment of the Honolulu High-Capacity Transit Corridor in this area

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to lie entirely within the roadway right-of-way to avoid any loss of park space to straddle-bent columns.

3. Native Hawaiian re-interment burial sites are located within the Ewa portion of the Queen Street Park and within the Mauka Diamond Head corner of Mother Waldron Park. The City and County of Honolulu should coordinate with the State Historic Preservation Office and Oahu Burial Council in identifying and monitoring native Hawaiian burial sites during construction.

4. The Hawaii Community Development Authority ("HCDA") has planning and zoning jurisdiction within Kakaako and Kalaeloa Community Development Districts and a development permit from HCDA is a requirement for any development within these Districts. Development permits from the HCDA shall be required for construction of the transit guideway, transit stations and any other accessory structures associated with the Honolulu High-Capacity Transit Corridor Project within the Kakaako and Kalaeloa Community Development Districts.

5. Small businesses in Central Kakaako are a vital part of the State's economy and include nearly 200 businesses employing close to 1,000 people and generating approximately $60 million in annual sales. Any impact to these businesses due to construction and operation of the transit project needs to be discussed in the FEIS.

6. Halekauwila Street is identified as the alignment for the Locally Preferred Alternative. It appears that the elevated guideway support columns will encroach into the traffic lanes on Halekauwila Street. If there will be a loss of a travel lane on Halekauwila Street, regional traffic impact due to the loss of travel lane needs to be addressed in the FEIS.

7. It appears that portions of the Locally Preferred Alignment and transit stations are located within lands owned by General Growth Properties, Inc. ("GGP") and Kamehameha Schools ("KS"). The HCDA is currently reviewing master plan applications submitted by both GGP and KS for the development of lands within the Kakaako Community Development District. We request that your department coordinate the alignment as well as the location and detailed design of the stations with the HCDA, GGP, and KS and report its findings and recommendations in the FEIS.

8. The issue of "elevated" or "at-grade" track for the Kakaako and Kalaeloa Districts does not appear to be fully explored. This issue needs to be analyzed in depth and (at a minimum) the Kakaako and Kalaeloa communities need to be engaged. Though the DEIS refers to the possibility of building sections of the transit corridor in Kapolei "at-grade", stakeholder discussions conducted in the Kalaeloa Community Development District have produced support for a grade-separated system. We request that the FEIS include community feedback and analysis of the costs and benefits of constructing "elevated" and "at-grade" tracks for this project.

9. The alignment of the Project within the Kalaeloa Community Development District will impact multiple landowners and created a level of confusion as to the timing, requirements and impacts to future program activities and plans. The FEIS should document any comments received from and response given to the Hawaii Army National Guard, Ford Island Properties, Department of Hawaiian Homes Land, Carmel Partners, Hawaii Public Housing Authority and the Veteran Administration with respect to alignment and other expected impacts of the project upon their land use and programs.

10. The Kalaeloa, Kapolei and Ewa Beach communities currently suffer from the lack of a multi-modal transportation system and the distance to employment centers. The DEIS does not discuss how the Honolulu High-Capacity Transit

Corridor Project will be integrated into a transit-bus-shuttle system and will meet the needs of these communities.

Along with the general comments listed above, specific comments include the following:

- Provide the extent of acquisition of additional right-of-way along alignment including size, location and dimension of anticipated right-of-way acquisition. Page 3-39, Table 3-21.

- Provide more detailed information on neighborhood parking programs. Page 3-44, Section 3.4.5.

- Industrial uses should also be included in the description of Kakaako. Existing Land Use Overview by Planning Area (last paragraph) Page 4-11, Table 4-2.

- Include Kalaeloa Master Plan and Kakaako Community Development District Mauka Area Plans in Future Land Use Plans and Policies, Page 4-13.

- Identify Symbol "H" on Page 4-32, Figure 4-12, as the John A. Burns School of Medicine.

- The Kakaako Community Development District is comprised of 614 acres, including the Makai Area. Page 4-42, Ala Moana-Kakaako. Please note that the Ala Moana Boulevard is not a part of Kakaako Mauka Area.

- Chapter 1, P. g. 1-7, Figure 1-4, Major Activity Centers in the Study Corridor refer to the Kalaeloa Industrial Park near Fort Barrette and Roosevelt Roads. The reference to the Kalaeloa Industrial Park is incorrect as this facility does not exist. The reference should instead refer to the Kalaeloa Community Development District.

If there are any questions, please feel free to call me at 587-2870.

Sincerely,

Anthony J. H. Ching
Executive Director

AJHC/DN:ak
c: Mr. Ted Matley, FTA Region IX

DEPARTMENT OF TRANSPORTATION SERVICES

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT2/09-297835R

Mr. Anthony J.H. Ching, Executive Director
Hawaii Community Development Authority
State of Hawaii
677 Ala Moana Boulevard, Suite 1001
Honolulu, Hawaii 96813

Dear Mr. Ching:

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

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

1. Identification of archaeological sites will be conducted for the Project pursuant to the Programmatic Agreement (PA) described in Section 4.16 of the Final EIS. The PA is available in Appendix H of the Final EIS. The PA will include survey plans, surveys, and coordination. Kalaeloa is outside of the Project study area; therefore, it will not be impacted. Coordination with the State Historic Preservation Division is ongoing.

2. The Project design has been revised in the vicinity of the proposed Queen Street Park. The Project will not use land from the park.

3. Coordination with the Oahu Island Burial Council and the State Historic Preservation Division is on-going and includes evaluation and analysis of any potential impacts on native Hawaiian burial sites. Such sites are covered by the PA described above.

4. Development permits from HCDA have been added to the List of Anticipated Permits in the Final EIS, Section 4.21 (Table 4-40).

5. An analysis of construction impacts on businesses is summarized in the Final EIS (Section 4.18.1) and detailed in Section 5.2.2 of the Honolulu High-capacity Transit Corridor Project Economics Technical Report (RTD 2008c). This and other technical reports are available at local libraries, DTS, on the project website at www.honolulutransit.org, and the offices of the City and County of Honolulu. The primary impacts are anticipated to result from inconveniences and disruptions to adjacent residents, businesses, and business customers that are inherent in any major construction project, which include:

- *Presence of construction workers and materials.*
- *Temporary road closures and traffic diversions.*
- *Temporary reductions in parking availability.*
- *Airborne dust, noise, and vibrations.*
- *Businesses' temporary loss or change of visibility to their customers.*

Control measures, as discussed in Section 4.18.1, Land Use and Economic Activity, of this Final EIS will mitigate these effects to protect residents' comfort and daily life and to prevent inconveniences and disruptions to the flow of customers, employees, materials, and supplies to and from area businesses. The Maintenance of Traffic Plan will address temporary effects on access to businesses during construction. Proposed mitigation to reduce adverse economic hardships for existing businesses along the project alignment during construction activities will include:

- *Coordinating construction planning and phasing with nearby property owners and businesses.*
- *Developing a public involvement plan prior to construction to inform business owners of the construction schedule and activities.*
- *Initiating public information campaigns, including signs and lighting, to reassure people that businesses are open during construction and to encourage their continued patronage.*
- *Minimizing the extent and number of businesses, jobs, and access affected during construction.*
- *To the extent practicable, coordinating the timing of temporary facility closures to minimize impacts to business activities, especially those related to seasonal or high sales periods.*
- *Minimizing, as practical, the duration of modified or lost access to businesses.*

- *Providing public information (e.g., press releases or newsletters) regarding construction activities, including advertisements in print and on television and radio.*

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

- *Providing advanced notice if utilities will be disrupted and scheduling major utility shut-offs during non-business hours.*

6. As shown in Table 3-21 of the Final EIS, all travel lanes along Halekauwila Street will be preserved; however, the exclusive Ewa-bound right-turn only lane at South Street will be removed. Table 5-33 in Honolulu High-Capacity Transit Corridor Project Transportation Technical Report and Addendum 02 to the Transportation Technical Report (RTD 2009i) shows the column placement effects along Halekauwila Street.

7. The Project right-of-way team has contacted and will continue to coordinate with all property owners, including General Growth Properties, Inc., and Kamehameha Schools, along the alignment regarding all proposed partial and full acquisitions. All properties with right-of-way impacts are listed in Appendix C, Preliminary Right-of-Way Plans, of this Final EIS.

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

The Alternatives Screening Memorandum (DTS 2006a) recognized the visually sensitive areas in Kakaako and Downtown Honolulu, including the Chinatown, Hawaii Capital, and Thomas Square/Academy of Arts Special Design Districts. To minimize impacts on historic resources, visual aesthetics, and surface traffic, the screening process considered 15 combinations of tunnel, at-grade, or elevated alignments between Iwilei and Ward Avenue. Five different alignments through Downtown Honolulu were advanced for further analysis in the Alternatives Analysis, including an at-grade portion along Hotel Street, a tunnel under King Street, and elevated guideways along Nimitz Highway and Queen Street.

The Alternatives Analysis Report (DTS 2006b) evaluated the alignment alternatives based on transportation and overall benefits, environmental and social impacts, and cost considerations. The report found that an at-grade alignment along Hotel Street would require the acquisition of more parcels and affect more potential burial sites than any of the other alternatives considered. The alignment with at-grade operation Downtown and a tunnel through the Capital Historic District, in addition to the environmental effects such as impacts to cultural resources, reduction of street capacity, and property acquisition requirements of the at-grade and tunnel sections, would cost an additional $300 million.

The Project's purpose is "to provide high-capacity rapid transit" in the congested east-west travel corridor (see Section 1.7 of the Final EIS). The need for the Project includes

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

- ***System Capacity, Speed, and Reliability:*** *The short, 200-foot (or less) blocks in Downtown Honolulu would permanently limit the system to two-car trains to prevent stopped trains from blocking vehicular traffic on cross-streets. Under ideal operational circumstances, the capacity of an at-grade system could reach 4,000 passengers per hour per direction, assuming optimistic five minute headways. Based on travel forecasts, the Project should support approximately 8,000 passengers in the peak hour by 2030. Moreover, the Project can be readily expanded to carry over 25,000 in each direction by reducing the interval between trains (headway) to 90 seconds during the peak period. To reach a comparable system capacity, speed, and reliability, an at-grade alignment would require a fenced, segregated right-of-way that would eliminate all obstacles to the train's passage, such as vehicular, pedestrian, or bicycle crossings. Even with transit signal priority, the at-grade speeds would be slower and less reliable than an elevated guideway. An at-grade system would travel at slower speeds due to the shorter blocks, tight and short radius curves in places within the constrained and congested Downtown street network, the need to obey traffic regulations (e.g., traffic signals), and potential conflicts with other at-grade activity, including cars, bicyclists, and pedestrians. These effects mean longer travel times and far less reliability than a fully grade-separated system. None of these factors affect an elevated rail system. The elevated rail can travel at its own speed any time of the day regardless of weather, traffic or the need to let cross traffic proceed at intersections.*

- ***Mixed-Traffic Conflicts****: The planned three-minute headways on the guideway will prevent effective coordination of traffic signals in the delicately balanced signal network in Downtown Honolulu. A three minute cycle of traffic lights would affect traffic flow and capacity of cross-streets. Furthermore, there would be no option to increase the capacity of the rail system by reducing the headway to 90 seconds, which would only exacerbate the signalization problem. An at-grade system would require removal of two or more existing traffic lanes on affected streets. This effect is significant and would exacerbate congestion. Congestion would not be isolated to the streets that cross the at-grade alignment but, instead would spread throughout Downtown. The Final EIS shows that the Project's impact on traffic will be isolated and minimal with elevated rail, and in fact will reduce system-wide traffic delay by 18 percent compared to the No Build Alternative (Table 3-14 in the Final EIS). The elevated guideway will require no removal of existing travel lanes, while providing a reliable travel alternative. When traffic slows, or even stops due to congestion or incidents, the elevated rail transit will continue to operate without delay or interruption.*

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

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

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

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

The Project has logical termini at East Kapolei and Ala Moana Center and independent utility from any extensions that may be constructed in the future. The future extensions to West Kapolei, Salt Lake Boulevard, Waikiki, and UH Manoa are discussed in the cumulative impacts sections of Chapters 3 and 4 of the Final EIS. However, the future extensions are not part of this Project; thus, they are not required to be evaluated under Chapter 343 of the Hawaii Revised Statutes and NEPA. Under NEPA, environmental analysis is only required when there is a proposed action by a Federal agency. Here, because the future extensions are not proposed for implementation at this time, they are not part of the Project studied in the Final EIS. It would be premature to undertake an environmental analysis of the extensions (beyond the cumulative impacts analysis) because they are not part of the proposed action to be taken by the City and FTA. If the future extensions are proposed for implementation in the future, environmental analysis of the extensions and appropriate alternatives will be undertaken at that time. The Project will not affect the Kalaeloa Community Development District. Fenced operation may be appropriate for the future extension through Kalaeloa and could be considered

when this extension is proposed for implementation. Chapters 2 and 8 of the Final EIS have been revised to include a discussion of the at-grade system.

9. As stated previously, the Project will not affect the Kalaeloa Community Development District. The area may be affected by a future project that would extend the system. The City would coordinate with HCDA at that time.

10. Section 3.4.2, Effects on Transit, of this Final EIS states that the bus network will be restructured to provide access from surrounding communities to the fixed guideway with more frequent bus service. In addition, because of the high frequency of the fixed guideway service (three-minute headways between trains during peak periods), riders transferring from buses to the fixed guideway will experience minimal wait times. Riders transferring from the guideway service to buses will benefit from improved frequencies on existing bus routes serving stations. Also, several new routes with high frequencies will be provided as feeders to the guideway system. Existing and future bus routes, including route numbers and frequencies, are provided as Appendix D, Bus Transit Routes, in this Final EIS. These include routes serving the Ewa Beach, Kapolei, and Kalaeloa areas.

The following responses address the specific comments listed in your letter:

- *Appendix C in the Final EIS shows all required right-of-way acquisitions, including location and size. These requirements will be refined during the design process.*

- *Neighborhood parking programs can vary, but one example involves identifying on-street locations that would be restricted to residents of the area. Permits would be provided to residents to allow them to park in the designated spaces. As noted in Section 3.4.4, Effects on Parking, of this Final EIS, neighborhood parking is one of several potential strategies that could address spillover parking. Mitigation strategies would be determined in coordination with appropriate stakeholders.*

In response to your comments, the following edits have been made to the Final EIS:

- *Text in Table 4-2, Existing Land Use Overview by Planning Area, in the Final EIS now states: "Adjacent to Downtown, Kakaako contains a mix of large retail uses, industrial uses, restaurants, and theaters."*

- *The Kalaeola Master Plan and the Kakaako Community Development District Mauka Area Plan have been added to the Section 4.2.2, Affected Environment [Land Use] of this Final EIS.*

- *The only community facilities called out by name on the figures in Section 4.5 are those that are impacted by the Project. This school is within one-half mile of the Project but is not impacted by the Project and, therefore, noted by symbol only.*

- *The Kakaako Community Development District size has been revised to 614 acres. See Section 4.6.2, Affected Environment [Neighborhoods].*

- *Ala Moana Boulevard is not part of Kakaako Mauka Area (Section 4.6.2).*
- *Figure 1-4 has been revised to just refer to "Kalaeloa."*

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

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

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HRD08/2156 K

February 2, 2009

Wayne Y. Yoshioka, Director
Department of Transportation Services
City and County of Honolulu
650 South King Street, 3rd Floor
Honolulu, Hawai'i 96813

RE: Honolulu High-Capacity Transit Corridor Project, Draft Environmental Impact Statement/Section 4(f) Evaluation, Island of O'ahu, Honolulu and 'Ewa Districts

Aloha e Wayne Y. Yoshioka,

The Office of Hawaiian Affairs (OHA) is in receipt of the above-mentioned letter dated November 12, 2008. The Department of Transportation Services – City and County of Honolulu (DTS) has submitted a copy of the Draft Environmental Impact Statement/Section 4(f) Evaluation (Draft EIS) for the Honolulu High-Capacity Transit Corridor Project (Project) to our office for review and comment. OHA has reviewed the project and offers the following comments.

The Draft EIS was prepared pursuant to the National Environmental Policy Act (NEPA), Section 4(f) of the U.S. Department of Transportation Act of 1966, Hawaii Revised Statutes (HRS) Chapter 343 and the Hawaii Administrative Rules, Title 11, Chapter 200. The review of this Draft EIS was triggered by both state and federal environmental and transportation policy laws and thus our comments on this document will reflect these laws and policies. OHA would also like to note that Section 106 consultation, pursuant to the National Historic Preservation Act of 1966 (NHPA), has also been triggered by this proposed action and is being conducted concurrent to the Draft EIS/Section 4(f) Evaluation.

The Role of OHA

OHA has substantive obligations to protect the cultural and natural resources of Hawai'i for its beneficiaries, the people of this land. The HRS mandate that OHA "[s]erve as the principal public agency in the State of Hawaii responsible for the performance, development, and

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coordination of programs and activities relating to native Hawaiians and Hawaiians; . . . and [t]o assess the policies and practices of other agencies impacting on native Hawaiians and Hawaiians, and conducting advocacy efforts for native Hawaiians and Hawaiians." (HRS § 10-3)

By direction of the statutory mandates, OHA continues to conduct advocacy efforts to protect the traditional cultural landscapes of Hawai'i. This includes the protection of archeological and historic resources, the perpetuation of traditional and cultural practices, and the continued health of our terrestrial and marine ecosystems. The dialogue that has played out in the decision on whether the City should pursue the largest public works project in the history of the State of Hawai'i has been controversial and widely publicized. OHA seeks not to weigh in on the controversial merits of development but seeks to assess the potential impacts that the Project will have on the landscape of the transit corridor.

Public Hearings for the Draft EIS

OHA is deeply concerned with format of the public hearings during the Draft EIS process. The public meetings were scheduled for 2 hours, but the local media reported that the first meeting on December 6, 2008 ended after thirty-one minutes. It was also reported that only ten residents offered testimony during the first meeting on December 6, 2008. OHA staff was able to attend the December 11, 2008 public hearing for the Draft EIS at Bishop Museum at 6:00pm. The meeting started shortly after 6:00pm with public comments being accepted at 6:05pm after a brief introduction by the project staff. After three members of the public offered testimony, the public hearing was officially closed at 6:12pm.

Our staff is concerned that members of the pubic who were not able to make it to the meetings on time may not have been afforded the opportunity to comment during these public meetings. Residents are often faced with many hardships, have many responsibilities and time commitments, may go to great lengths in order to attend public meetings, and are not always able to make the meetings precisely on time. The public should have been allowed to offer comments on the proposed project during the full two hours that was allotted and advertised for public comment.

Archeological, Cultural, and Historic Resources

Archeological, cultural, and historic preservation laws and regulations provide a regulatory context from which these resources will be identified, evaluated, and treated. As the Project is federally regulated by the NHPA, and its implementing regulation 36 CFR 800, an early determination of "adverse effects toward historic properties" was determined by the DTS and the Federal Transit Authority.

As a result of the determination of "adverse effects toward historic properties", a Memorandum of Agreement (MOA) is being developed to address the adverse effects toward historic properties. According to the consultation process described in the EIS, the process would involve the State Historic Preservation Division (SHPD) and other consulting parities in discussions regarding adverse effects on historic properties resulting in an MOA.

To our knowledge, consultation with the SHPD and the O'ahu Island Burial Council (OIBC) has been taking place in recent months and the development of an MOA has been progressing. OHA asks that our office be included as a consulting party to the MOA, as OHA is a specifically named Native Hawaiian Organization in the NHPA. As Section 106 consultation has commenced with our office, we further request that consultation continue with our agency. Early and continued consultation with all parities of the MOA shows a proactive effort is being made by the lead agencies responsible for consultation under Section 106 regulations.

According to the Draft EIS, a phased approach to identify archeological resources, including burials will be used in the Project. As a phased archeological inventory survey will be completed as the project commences, the extent of archeological resources that may be present is yet to be seen. Therefore, a Programmatic Agreement (PA) is being developed by the leads of the Project which will stipulate the full extent of responsibilities prior to each construction phase, identify invited concurring signatories, and provide direction on mitigation of adverse effects. OHA would like to be offered an opportunity to review and provide comment on the PA upon its completion.

Mitigation measures for any potential archeological resources that may be affected during construction include archeological monitoring, preserving archeological resources, and burial treatment. Subsurface archeological resources including burials could be impacted by construction. OHA advocates for archeological monitoring in any ground disturbing activities associated with the project. At the very least, archaeological monitoring should be performed in areas identified with a "Moderate" and "High" rating. Because an archeological monitoring plan is yet to be drafted and released we request to be provided this plan for review and comment upon completion. An approved archeological monitoring plan pursuant to the MOA should be enacted to set up a process to handle any archeological resources or iwi kūpuna that may be unearthed during construction.

OHA request DTS's assurances that should iwi kūpuna or Native Hawaiian cultural or traditional deposits be found during the construction of the project, work will cease, and the appropriate agencies will be contacted pursuant to applicable law. OHA would also like to be notified at that time.

Natural Resources

During early consultation for this project, concerns were expressed about the ko'oloa'ula (*Abutilon menziesii*), commonly known as the red 'ilima. The ko'oloa'ula is an endangered plant which is known to inhabit areas of Kapolei. The federal government is currently implementing a conservation plan for this endangered plant. OHA notes that the proposed project would encroach into within 200 feet of an established contingency reserve contained within a habitat conservation plan of these endangered plants. (DEIS, page 4-119) OHA realizes that mitigation measures have been specified for this habitat conservation plan that include future developments; however, we recommend that the incidental take license be reviewed to ensure that this particularly large and unique proposal will comply with specified measures previously determined. Therefore, we urge that the DTS reconsider their assertion of a finding of no effect

on any threatened, endangered or protected species (DEIS, page 4-125) until this is done. Also, has the DTS consulted with the U.S. Fish and Wildlife Service regarding seabird attraction preventative measures and incorporated them into their design plans? We would like to see a copy of DTS's Section 7 consultation.

Contaminated Sites

As the DEIS states on page 4-113, there are a number of properties proposed to be used that are contaminated. DTS should assess whether chemicals of potential concern are present in shallow soil or groundwater at these sites. If allowed to go forward, remediation of the contaminated areas before deconstruction will likely be necessary. Additionally, long-term biological and chemical monitoring should be established to measure any change in contaminant levels over time and the associated biological response.

OHA does appreciate that DTS proposes permanent best management practices (BMPs) to address water quality that include an inspection and maintenance plan to ensure that they are attaining their objectives. (DEIS, page 4-132)

Stormwater

Generally, OHA wishes to see stormwater as a resource to be captured and conserved rather than a nuisance to be channeled and drained away. The use of permeable paving materials can be used to retain some of the rain that falls, and catch basins can capture and help to slow the runoff thereby reducing turbidity. We hope that DTS can incorporate these ideas into their water management system, which already includes some of these concepts.

Pearl Harbor National Wildlife Refuge and Wetlands

OHA notes that the Pearl Harbor National Wildlife Refuge is listed habitat for endangered fauna and it exists within the project corridor. (DEIS, pages 4-123) In fact, DTS proposes to put a possible "maintenance and storage facility" (DEIS, page 4-132) a mere 1,000 feet from this protected habitat. OHA appreciates that the wetlands are to remain intact (DEIS, page 4-126); however, this in no way ensures that there will be no adverse effects to them.

For example, OHA sees that DTS proposes to fill in some wetlands. (DEIS, page 4-128) We also point out that the Draft EIS plainly states that this "maintenance and storage facility will include an increased level of BMPs because it would be the system's most industrial facility." (DEIS, page 4-132, emphasis added) OHA urges that strict BMPs should apply to this type of facility no matter where it is located and that since this is a "possible" location, placing it next to endangered species habitat is not the best siting for it. We recommend that alternative locations be analyzed in the EIS.

OHA seeks clarification that the classification of the receiving state waters for this estuary is Class 2. As such, we point out that DTS must be aware of the obligations to protect these waters for recreation, aquatic life (and wildlife), water supplies, and that any discharge must receive the best degree of treatment compatible with this class. Further, no new treated sewage discharges shall be permitted within estuaries. OHA notes that the Pearl Harbor estuary

will be impacted by this proposal and regardless of the current state of the water quality of any of the receiving waters; it is not to serve as an excuse for DTS to shirk their obligations. We also ask about compatibility with section 320 of the Clean Water Act and its associated National Estuary Program.

Energy

OHA would also like to point out that Hawai'i is re-inventing its energy portfolio. As such, DTS should consider that by 2020, 20% of Hawai'i's electricity is to be from renewable sources. Further, on January 28, 2008, Assistant Secretary of the Department of Energy and Governor Linda Lingle signed a groundbreaking Memorandum of Understanding (MOU) between the state government and the U.S. Department of Energy's Office of Energy Efficiency and Renewable Energy. The MOU estimates that Hawai'i can potentially meet between 60 and 70 percent of its future energy needs from clean, renewable energy sources.

As such, the legislature has recommended applicants consider the Leadership in Energy and Environmental Design (LEED) Green Building Rating System, which is the nationally accepted benchmark for the design, construction, and operation of high performance green buildings. OHA recommends the use of photovoltaic and small wind harvesting electrical generation for peripheral uses such as parking lot lighting. Solar energy should also be incorporated into the building plans. During construction, OHA urges the use of recyclable materials: steel studs and structural members, and wood products from certified sustainable sources. Landscaping should include native species and large trees to provide shade and cooling to buildings as well as parking lots. Additionally, state agencies are regulated by HRS §196-9 dealing with energy efficiency and environmental standards for state facilities, motor vehicles, and transportation fuel. Although the DTS is not obligated to adhere to this statute, as it is not a state agency, any efforts by your agency to comply with the standards set forth in the statute would show a good faith effort to minimize the impact that the Project will have on energy consumption.

Environmental Justice Concerns

OHA expresses some concern over the situation with the 100 percent minority Banana Patch community that will be dramatically affected by this proposal. OHA agrees that this community is unique and we recognize that this tight-knit community has been living there for generations. Displacement of this entire community is something that will have to be adequately addressed. We also point out that the residents of this area (who do not have access to basic infrastructure services such as water and sewage) are living in multi-generational housing, mainly as a result of economic circumstance, not so much as a result of cultural influences. (DEIS, page 4-55)

Signage as a Tool for Preservation

When cultural resources are affected, effective documentation of the resources and the cultural landscape in which it is located in should be considered as a mitigation measure. Signage related to the preservation of resources or the location of a relocated or displaced resource should be considered in order to preserve the history and culture of a landscape. This

mitigation measure could also have the potential to develop economic or community-based activities which would benefit the local communities that will be affected by the Project. Consultation regarding this matter could be conducted with local community organizations and local Hawaiian Civic Clubs.

Visual and Aesthetics Concerns

There is no doubt that the Project will create and produce visual and aesthetic effects on the landscapes within the transit corridor. Mitigation measures discussed in the DEIS focus on preserving visual resources and enhancing the project design to comply with applicable policies. The DEIS includes measures to consult with the communities surrounding each station for input on station design elements. OHA supports this measure and recommends consultation with each respective community's Neighborhood Board and Hawaiian Civic Club.

Many residents have expressed concerns over the visual and aesthetic impacts that the proposed project will have on the landscape. As a form of mitigating the effects the proposed project will have on the cultural landscape, we advocate that native plants should be incorporated into the landscaping and vegetation plans around the rail transit corridor including the transit stations when at all possible. Landscaping with native plants furthers the traditional Hawaiian concept of mālama 'āina and creates a more Hawaiian sense of place. This concept is one small way the cultural landscape can be preserved in an urban setting.

Thank you for the opportunity to comment. If you have further questions, please contact Jason Jeremiah by phone at (808) 594-1816 or e-mail him at jasonj@oha.org.

'O wau iho nō me ka 'oia'i'o,

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May 21, 2010

RT2/09-298689R

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

Dear Mr. Namuo:

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

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

Public Hearings for the Draft EIS

All five Public Hearings on the Draft EIS were scheduled for two hours each. Though the Public Hearing Officer's section of hearing oral testimony from the public closed prior to the end of the meetings because of lack of public comment, the Public Hearing Officer stayed through the entire two-hour scheduled Hearing and would have been able to reconvene the Hearing if requested by a member of the public wishing to provide comment. In addition, individuals were able to speak with a court reporter to make official comments and/or place written comments into the record for the entire two-hour time period the Hearing was scheduled for. Thus, the public was allowed to offer comments for the entire two hours that were allotted and advertised to the public. In addition, comments were accepted on the website and in writing through February 6, 2009.

Archaeological, Cultural, and Historic Resources

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

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

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

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

Natural Resources

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

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

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

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

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

Contaminated Sites

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

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

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

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

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

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

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

Stormwater

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

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

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

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

Pearl Harbor National Wildlife Refuge and Wetlands

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

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

The Clean Water Branch of the State Department of Health has provided comment on the Draft EIS. Through the individual Section 401 Water Quality Permit, the Clean Water Branch of the State Department of Health will ensure that the State's anti-degradation policy (HAR, Section 11-54-1.1) will be complied with. Permanent BMP's to protect water quality include vegetated swales, retention ponds, and grit removal structures; these are discussed above and in full detail in Section 4.14.3 of the Final EIS.

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

However, Pearl Harbor is considered to be an estuary because of the restricted exchange with the Pacific Ocean through a narrow mouth, and the substantial freshwater flows from a number of contributing springs and streams draining southern Oahu.

Energy

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

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

Environmental Justice Concerns

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

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

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

Signage as a Tool for Preservation

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

Visual and Aesthetic Concerns

The island's unique visual character and scenic beauty was considered in the visual and aesthetic analysis presented in the Draft EIS. The Project would be set in an urban context where visual change is expected and differences in scales of structures are typical. The following measures would be included with the Project to minimize negative visual effects and enhance the visual and aesthetic opportunities that it creates:

- *Develop and apply design guidelines that would establish a consistent design framework for the Project with consideration of local context.*
- *Retain existing trees where practical and provide new vegetation.*
- *Shield exterior lighting.*
- *Coordinate the project design with the City's TOD program within DPP. DTS will consult with the communities surrounding each station for input on station design elements.*

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

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

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

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
Creation Date :	2/6/2009
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Submission Date :	02/06/2009

Submission Content/Notes : To: Department of Transportation Services
From: Janet Gillmar/ ASLA/
Campus Planning Office/ U. of Hawaii
Date: February 6, 2009

Comments on the Rail Transit DEIS:

1. Alternate plans anticipating possible lower population and tourism levels

Two major new factors that could affect future population levels on Oahu because of a potential shrinkage of a mainstay of our economy, tourism, have arisen in the past year or two, global warming and economic turmoil. "The tectonic plates have moved". Given that our situation has changed since rail transit plans were begun, we need to review the plans in this light, make adjustments and proactively anticipate possible further adjustment in subsequent phases.

The first one of the new factors is recognition of the seriousness of global warming and the effect human activity has on it. The exponential increase in long distance global tourism that we have seen in the past 50 years may roll back in response to restrictions on air travel due to global warming. Of course, it could be that new passenger ships that use sails plus auxiliary engines, maybe solar powered, could allow the maintenance of current air travel volume to Hawaii. But we cannot make reliable projections here and need to be prepared for different scenarios.

The second new factor is the current global financial turmoil which includes volatile oil prices and reduced wealth in our traditional sources of visitors. Of course, there is the potential that rising incomes in Asia, in particular in China, will offset lower North American family travel budgets. Perhaps Hawaii will succeed in substantially increasing its presence in high technology sectors, significantly expand agricultural production, or find another way to support our current or higher levels of resident population. But, again, we cannot make reliable projections so need to be prepared to move in alternative ways.

The result could well be that our population will either not grow any more or would even shrink. Just one effect of this possibility is that rail transit planning should not continue to assume that it is politically impossible for any portion of the existing road lanes to be occupied by a rail line on the surface. Putting the transit line on the surface through the Chinatown-Downtown- State Capitol Special District, for instance, would make a major difference with respect to concerns about the negative visual impact of an elevated rail line through this central and historical part of our city, which has been carefully protected by City ordinances for many years.

2. Salt Lake versus airport route

It would seem that adding a spur to the airport from a main line through Salt Lake, or a spur to Salt Lake from the airport, should be feasible and would add immensely more value to the transit system with relatively

little added construction cost or operational problems. This is a feature in many other rail transit systems. There could be "A" trains to the airport, or Salt Lake, and "B" trains to Kapolei from central Honolulu and vice versa from Kapolei to Honolulu.

3. Visual and cultural impact on Special Districts

An elevated rail line should not run through Chinatown-Downtown-the State Capitol Special District not only because of the special district status for 2 of those places but specifically because of the severe visual impact on the mauka-makai views that are part of the special district ordinances as well as the adjacent urban environment. The logical and traditional Hawaiian way of orienting oneself on islands is by reference to the radius of a circle, via mauka-makai views, and along the circle, via Ewa and Diamond for central Honolulu. Impeding or degrading those views would have a serious impact on important historic buildings and landscapes and a Hawaiian sense of place that everyone, including our economically important visitors, would sense and react to negatively.

4. Conceptual and detailed design

How well the conceptual and detailed design of all parts of the system is done, especially the elevated portions of the system and the stations, will significantly affect community acceptance. In general, all elements should be as visually unobtrusive as possible.

a. To do that, stations need to be individually designed. The landscape architect should be an equal partner from the beginning of the design process. The architectural design for each structure as a whole should be low-profile, not heroic or iconic. Each structure should be sensitively attuned to its urban and/or scenic landscape context, the architectural character of adjacent buildings and very well designed in its construction and details.

b. The structure for elevated portions of the system should be a thread of unobtrusively elegant sculpture that varies in color and form, chameleon-like, according to its context.

5. Impact on existing road lanes, sidewalk and planting space

Where an elevated structure is inserted in an existing road right of way corridor, what happens to the sidewalk and tree planting space if existing road travel lane capacity is to be maintained?

6. Impact on ability to provide future bicycle lanes

Interest in providing for more and safer bicycle travel via designated bicycle lanes has increased. If some of the right of way space is taken for the piers supporting an elevated rail line, how can bicycles be accommodated?

DEPARTMENT OF TRANSPORTATION SERVICES

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MAYOR

WAYNE Y. YOSHIOKA
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DEPUTY DIRECTOR

June 11, 2010

RT2/09-299179R

Ms. Janet Gillmar
Campus Planning Office
University of Hawaii
P.O. Box 2902
Honolulu, Hawaii 96802

Dear Ms. Gillmar:

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

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

1. Ridership Forecasts and an at-grade alignment

Use of the adopted local Metropolitan Planning Organization (MPO) land use and socio-economic forecasts in developing travel forecasts is a requirement of the Federal transit planning process. In this case, the Project relies on information about the 2030 level of growth on Oahu.

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

combinations of tunnel, at-grade, or elevated alignments between Iwilei and Ward Avenue. Five different alignments through Downtown Honolulu were advanced for further analysis in the Alternatives Analysis, including an at-grade portion along Hotel Street, a tunnel under King Street, and elevated guideways along Nimitz Highway and Queen Street.

The Alternatives Analysis Report (DTS 2006b) evaluated the alignment alternatives based on transportation and overall benefits, environmental and social impacts, and cost considerations. The report found that an at-grade alignment along Hotel Street would require the acquisition of more parcels and affect more potential burial sites than any of the other alternatives considered. The alignment with at-grade operation Downtown and a tunnel through the Capital Historic District, in addition to the environmental effects such as impacts to cultural resources, reduction of street capacity, and property acquisition requirements of the at-grade and tunnel sections, would cost an additional $300 million.

The Project's purpose is "to provide high-capacity rapid transit" in the congested east-west travel corridor (see Section 1.7 of the Final EIS). The need for the Project includes improving corridor mobility and reliability. The at-grade alignment would not meet the Project's Purpose and Need because it could not satisfy the mobility and reliability objectives of the Project (see bullets below). Some of the technical considerations associated with an at-grade versus elevated alignment through Downtown Honolulu include the following:

- ***System Capacity, Speed, and Reliability:*** *The short, 200-foot (or less) blocks in Downtown Honolulu would permanently limit the system to two-car trains to prevent stopped trains from blocking vehicular traffic on cross-streets. Under ideal operational circumstances, the capacity of an at-grade system could reach 4,000 passengers per hour per direction, assuming optimistic five minute headways. Based on travel forecasts, the Project should support approximately 8,000 passengers in the peak hour by 2030. Moreover, the Project can be readily expanded to carry over 25,000 in each direction by reducing the interval between trains (headway) to 90 seconds during the peak period. To reach a comparable system capacity, speed, and reliability, an at-grade alignment would require a fenced, segregated right-of-way that would eliminate all obstacles to the train's passage, such as vehicular, pedestrian, or bicycle crossings. Even with transit signal priority, the at-grade speeds would be slower and less reliable than an elevated guideway. An at-grade system would travel at slower speeds due to the shorter blocks, tight and short radius curves in places within the constrained and congested Downtown street network, the need to obey traffic regulations (e.g., traffic signals), and potential conflicts with other at-grade activity, including cars, bicyclists, and pedestrians. These effects mean longer travel times and far less reliability than a fully grade-separated system. None of these factors affect an elevated rail system. The elevated rail can travel at its own speed any time of the day regardless of weather, traffic or the need to let cross traffic proceed at intersections.*

- ***Mixed-Traffic Conflicts:*** *The planned three-minute headways on the guideway will prevent effective coordination of traffic signals in the delicately balanced signal network in Downtown Honolulu. A three minute cycle of traffic lights would*

affect traffic flow and capacity of cross-streets. Furthermore, there would be no option to increase the capacity of the rail system by reducing the headway to 90 seconds, which would only exacerbate the signalization problem. An at-grade system would require removal of two or more existing traffic lanes on affected streets. This effect is significant and would exacerbate congestion. Congestion would not be isolated to the streets that cross the at-grade alignment but, instead would spread throughout Downtown. The Final EIS shows that the Project's impact on traffic will be isolated and minimal with elevated rail, and in fact will reduce system-wide traffic delay by 18 percent compared to the No Build Alternative (Table 3-14 in the Final EIS). The elevated guideway will require no removal of existing travel lanes, while providing a reliable travel alternative. When traffic slows, or even stops due to congestion or incidents, the elevated rail transit will continue to operate without delay or interruption.

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

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

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

would have a negative system-wide impact that would reduce ridership throughout the system. The at-grade system would not meet the Project's Purpose and Need and, therefore, does not require additional analysis.

The Project's visual effects on Chinatown are discussed under the "Kalihi to Ala Moana Center Landscape Unit" heading in Section 4.8.2 of the Final EIS. The discussion notes the station and guideway will be dominant features in views along Nimitz Highway and that distant views over Nuuanu Stream and Honolulu Harbor will be partially blocked. It is acknowledged that the Project will have an adverse visual effect on the Chinatown Historic District. Please refer to Chapter 4.16 of the Final EIS for further discussion of effects on the Historic Chinatown District.

The overall objectives and design guidelines for the Chinatown District will be addressed during the ongoing station areas planning process. This process involves numerous aspects of transit system design with focus on characteristics and preferences of the communities adjacent to stations. In addition, the following mitigation framework will be included in the Project to minimize negative visual effects and enhance the visual and aesthetic opportunities that it creates:

- *Develop and apply design guidelines that will establish a consistent design framework for the Project with consideration of local context.*
- *Coordinate the project design with City TOD planning and DPP.*
- *Consult with the communities surrounding each station for input on station design elements.*
- *Consider specific sites for landscaping and trees during the final design phase when plans for new plantings will be prepared by a landscape architect. Landscape and streetscape improvements will serve to mitigate potential visual impacts.*

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

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

Consistent with the request, as part of the design of stations, the City has begun a series of consultation meetings with the communities surrounding each project station to obtain input on station design elements.

2. Salt Lake versus Airport route

Both the Airport and the Salt Lake Alternatives were carried forward in the Draft EIS as neither had been selected as the Preferred Alternative at that time. While each of the alternatives includes trade-offs between benefits and impacts, the Airport Alternative from East Kapolei to Ala Moana Center has been identified as the Preferred Alternative. The identification of the Airport Alternative as the Preferred Alternative was made by the City to comply with FTA's NEPA regulations that state that the Final EIS should focus on the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative, public input on the Draft EIS, and City Council Resolution 08-261 identifying the Airport Alternative as the Project. The selection of the Airport Alternative is described in Chapter 2 of the Final EIS. The discussion of the alternatives considered is included in Chapter 2 of the Final EIS and the Alternatives Analysis. Based on the City Council's direction under Resolution 08-261, the Salt Lake alignment will be carried forward as a planned extension. At such time that funding becomes available, a decision could be made to build the full connection or a spur.

3. Visual and cultural impact on Special Districts

Please see comment above regarding visual effects.

4. Conceptual and detailed design

Your comment regarding the design of the elevated structure is noted. Final Design of the structure is not yet underway, but every effort will be made to minimize the intrusive aspects of a large guideway structure within the context of structural strength requirements and available materials. Design of the columns and guideway will consider treatments to reduce aesthetic interference with the surrounding environment.

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

5. Existing road lanes, sidewalk, and planting space.

All sidewalks will be preserved, although some may be narrowed to avoid additional impacts on adjacent properties. Table 3-25 in the Final EIS presents information on potential effects on pedestrian facilities due to the placement of fixed

guideway columns. Sidewalk plantings will be reestablished and even introduced where possible.

6. Future bicycle lanes

Existing bicycle lanes and shared-use roadways will be maintained throughout the transit corridor. Where future bicycle lanes are planned, sufficient space will be preserved for their construction. The Project is coordinating design with the update of the Oahu Bicycle Master Plan where possible. The effects on bicycle and pedestrian facilities are presented in Section 3.4.5 of the Final EIS.

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

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Water Resources Research Center
Environmental Center

UNIVERSITY of HAWAI'I® MĀNOA

February 6, 2009
RE: 0784

Wayne Yoshioka
Department of Transportation Services
City and County of Honolulu
650 South King Street, 3rd floor
Honolulu, HI 96813

Dear Mr. Yoshioka:

Draft Environmental Impact Statement
Honolulu High-Capacity Transit Corridor Project
Honolulu and Ewa, Oahu

City and County of Honolulu, Department of Transportation Services proposes to construct a high-capacity rail system between East Kapolei and Ala Moana Center. The Draft Environmental Impact Statement includes a No Build and 3 Build Alternatives. The Build Alternatives would involve between 19 and 25 miles of elevated guideway and would include transit stations, a maintenance and storage facility, and park-and-ride facilities.

This review was conducted with the assistance of Karl Kim, UHM Urban and Regional Planning; Panos Prevedouros, UHM Civil and Environmental Engineering; Evelyn Cox, UHWO Biology; and Ryan Riddle, Environmental Center.

General Comments

We feel that the DEIS does not adequately capture the full range of costs and benefits associated with the proposed project. It appears to focus too narrowly on transportation elements rather than on the full range of social, environmental, and economic benefits and costs associated with the proposed project. While travel time savings are indeed an important potential aspect of the project, so too are other factors such as mobility, access, energy use, and economic issues. The DEIS also fails to adequately incorporate concepts of sustainability especially as it applies to project design.

In addition to our general comments we also have several specific comments.

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Alternatives Considered (pp. S-2 – S-4)

The project calls for an elevated guideway. The benefits of this system compared to an at-grade system have not been sufficiently demonstrated. How much additional performance in terms of reduction in travel time is achieved by elevation compared to signal prioritization and other operating procedures that could be implemented with an at-grade system?

The benefits of being on the ground, up close to activity generators compared to proposed elevated stations in the middle of roadways have not been demonstrated. There is insufficient discussion of the benefits of an exclusive right-of-way and automation over an at-grade system operated by drivers. How do the labor savings associated with a fully automated system compare with the capital and environmental costs of building an elevated concrete structure?

The documents do not sufficiently describe the operating characteristics of the system vis-à-vis other competing technologies in terms of performance, convenience, and trip quality. If instead of building an expensive elevated transit system in which billions are spent on concrete structures, what if a comparable level of spending was on buses, at-grade light rail, and improvements to the energy grid? Given the unreliability of Oahu's electric system and the two recent islandwide blackouts, more attention should go towards design of a more appropriate system given apparent limitations in the present electrical infrastructure.

DEIS Base Travel Times (p. 1-5)

One of our faculty reviewers offered this anecdote questioning the DEIS' given vehicular travel time of 89 minutes from Kapolei to Downtown:

> *Having resided in Kapolei for a short period if 2007, I know from personal experience that the morning peak period travel time from Kapolei to downtown is always under 75 minutes in the absence of rain or any lane closure. I was startled that the DEIS uses a time of 89 minutes.*

In a non scientific survey of people listening in to a radio program some measurements of travel time from the H-1 freeway to Alakea Street in downtown if they depart Kapolei between 6 AM and 7 AM were discussed. The average time of the callers was about 60 minutes. Therefore, roughly speaking the DEIS may be using a 50% overestimate of the travel time which leads to false benefits of travel times by rail.

The DEIS fails to demonstrate the root causes of traffic congestion. The real issue is traffic flow conditions on Nimitz Highway which varies widely as these travel times show: 11, 16 or 18 minutes with good conditions, 25, 30 or 41 minutes with poor conditions. This makes it clear that a roughly two mile long Nimitz Viaduct will provide a consistent travel time from airport-to-Alakea of about 6 minutes, reducing the peak hour trip from Kapolei to downtown

from about 60 minutes to about 40 minutes. A relatively modest investment solves a huge part of the morning commute congestion.

Note that rail will be providing airport-to-Alakea transit travel time of about 50 to 54 minutes depending on the route selected. The airport route provides the longest travel time for this origin-destination pair while the Salt Lake route a little shorter.

Alternatives and Technologies Considered but Rejected (p. 2-7)

The DEIS is inaccurate in claiming that OMPO rejected the Pearl Harbor Tunnel. The UH Congestion Study found that this alternative has substantial traffic benefits at a cost comparable to that of the rail. There has been no substantiation to the tunnel's alleged costs between 7and 11 billion dollars.

Methodology (pp. 3-2 – 3-3)

The Synchro 6.0 software suite was used for intersection analysis. Synchro applied the HCM Operational Analysis methodology and intersection input data to estimate control delay at each study intersection. This traffic analysis method is not suitable for saturated conditions, and is not suitable for corridor and regional studies. HCM mentions these limitations. Almost all traffic elements along this corridor are oversaturated, thus HCM methodologies do not apply (unless the wrong data are used and degrees of saturation are low). Either way the output is wrong or misleading.

Future Conditions and Effects: No Build Alternative (p. 3-16)

On page 3-16 the DEIS states, "Even with $3 billion in roadway improvements under the No Build Alternative, traffic delay in 2030 would increase by 44%". If one was to correctly model all the committed congestion relief projects in the Oahu Regional Transportation Plan 2030 and combine them with the fact that Oahu's population has been stagnant or falling (and bound to further fall due to the poor economy and housing prices), the highway congestion in 2030 could improve by at least 15%.

For example, the PM zipper alone will carry about 1,500 vehicles per hour through the Kalauao screenline with three or more people in them thus resulting in a person capacity of 4,500 going west. These are individuals removed from the existing network thus providing substantial traffic relief. The westbound utilization of the rail will be optimistically 6,000 people through the Kalauao screenline of whom at most half will be drivers and ex-carpoolers or 3,000 people. The PM zipper combined with a Nimitz flyover can potentially result in a continuous trip at 55 miles per hour from Iwilei to Waikele to Kapolei. This commute is half as long in duration as that by rail. Therefore the PM zipper lane can potentially be more beneficial. However, the DEIS tries to convince us that major traffic congestion relief projects will not yield much relief whereas the

rail with its inferior speed and 15+ stops to Kapolei will yield superior travel time savings and traffic congestion improvements. Part of the reason is likely that planning models are insensitive to bottlenecks and only provide rough estimates based on some assumed values of capacity. One of our reviewers asserts that a regional microsimulation traffic model assessing the impacts with and without correctly modeled ORTP 2030 projects is needed to assess the benefits of the projects in Table 2-3 of the DEIS.

Transit Ridership (p. 3-26 – 3-34)

The description of patronage estimates for the system is weak. There is insufficient detail to adequately review and validate the estimates for ridership. Given advances in ridership forecasting and spatial analysis of trip origins and destinations, more disaggregate level information should have been provided. While the underlying model seems appropriate for regional highway planning, it seems less appropriate for analyzing a specific transit corridor or for estimating the demand for rail transit in specific neighborhoods or associated with individual stations. In particular, the travel behavior of pedestrians and those making shorter urban trips does not appear to be adequately captured. More attention should be given to public transit users. The forecasting method relies too heavily on out-dated population estimates and doesn't incorporate more recent changes in growth, development, and economic conditions. Additionally, there isn't sufficient distinction by trip purpose, nor adequate modeling of induced trips or behavioral changes associated with the construction of the system.

Specific improvements for the transit-dependent or households without access to private automobiles should be described as well as the station-by-station improvement in services for the elderly or persons with disabilities. The benefits or changes in level of transportation services for low income as well as other environmental justice populations should also be evaluated at the neighborhood or TAZ level. Many of the maps and displays lack sufficient detail in order to evaluate neighborhood or community-level impacts.

The increase in ridership related to transit oriented development should also be addressed. Efforts to validate the ridership forecasts should be described as well as an assessment of not just data quality, accuracy, and reliability but also assumptions regarding growth and development in the corridor served by the proposed transit system. The robustness of patronage estimates given changes in fuel prices, economic growth, employment, and other trip-making activities are not adequately demonstrated.

A related area of concern is the impacts of the system on bus ridership and service to communities in outlying areas. The extent to which the bus system will support and feed riders to the rail system should be described as well as the changes in service for all transit patrons. To what extent will there be duplicate bus and rail service?

Effects on Parking, Bicycle and Pedestrian Facilities, and Freight (pp. 3-41 – 3-44)

The analysis of transportation impacts fails to adequately cover the relationship between increased and improved rail services and changes in the level and distribution of bicycle, pedestrian and other trips. While some mention was made of improvements to pedestrian facilities, the effects of these investments on pedestrian tripmaking behavior aren't described. A more complete discussion of non-motorized travel demand and its relationship to improved transit services should have been included.

Environmental Analysis, Consequences and Mitigation (p. 4-1 – 4-175)

The benefits of the proposed system in terms of reduced air pollution, greenhouse gas emissions and dependency on fossil fuels have not been adequately described. The estimates of transportation impacts should have been related to both local greenhouse gas inventories and carbon budgets. The transit system has the potential of significantly affecting not just emissions but also patterns of local development that in turn shape land use, development, and travel behavior.

The environmental benefits of taking cars off the road have not been sufficiently quantified. It's not just the reduction in traffic, but also other costs (parking, repair and maintenance, safety, etc.) that should be quantified. The reduction in non-point source pollution associated with automobile use as well as the decreased disposal costs associated with motor vehicles might also have been described.

Environmental impacts associated with the proposed project were also inadequately described – namely the impacts associated with the production of concrete and the construction of an elevated system. A life-cycle approach to estimating environmental impacts over time for the various components of the system as well as alternatives should have been provided.

In regards to energy expenditure, a more thorough discussion of energy usage should be provided. Estimates of the per vehicle, per trip energy requirements of the proposed system compared to alternative travel modes (bus, private auto, etc.) should have been provided.

The DEIS should also discuss the potential public health benefits associated with public transit such as increased access to health facilities and a reduction in motor vehicle accidents.

Land Use (pp. 4-10 – 4-18)

Changes in the density of development associated with the proposed project should be discussed in the DEIS as well as the potential for reducing suburban sprawl and the preservation of green space, farmland, and areas for carbon sequestration.

Economic Activity (pp. 4-23 – 4-22)

The economic value of the project in terms of stimulus to the economy is not sufficiently described. What share of the total project costs can be provided with local factors of production versus imported labor, capital, materials and supplies? Are there adequate construction support facilities for a project of this magnitude? Where will the concrete come from? What will be the effect of this project on other planned capital projects in both the public and private sector? How does this project relate to other planned transportation projects on Oahu such as improvements to Nimitz Highway and other large-scale construction projects? While there is currently an economic slowdown, what will be the economic conditions at the time of construction and during the duration of the project? Better economic data for the planning, construction and operating phases of the project should be provided.

More current information regarding key indicators of economic performance for Honolulu should be provided as well as the effects of a large construction project on the local economy. Which economic sectors are likely to be affected? To what extent will proceeds from the project generate local versus off-island returns? How much will local businesses benefit from the project? How much new labor will need to be imported into the state? What is the local and regional impact of the project in terms of income, job creation, wages, inflation, and economic welfare for residents?

Energy and Electric and Magnetic Fields (pp. 4-107 – 4-109)

The adequacy of the electricity system to support this project should be more fully demonstrated in terms of generation, transmission, and distribution issues. Development of a "smart grid" as well as opportunities for renewable energy (solar, wind, etc.) that make use of stations, guideway structures and other elements of the system should also have been included.

Maintenance and Storage Facility (pp. 4-151 – 4-152)

The rail yard is located several miles inland with no direct access to the harbors. The DEIS is silent as to how rail cars and rail equipment will be transported there since rail cars do not fit on regular flatbed trucks and even if they can be accommodated by length and by weight on custom flatbeds, they do not fit by height due to the existence of several overpasses along the freeway. What are the logistics and costs of this significant part of construction?

Cash Flow Analysis (pp. 6-7 – 6-11)

The proposal appears to be based on overly optimistic forecasts of economic growth and general excise and use tax (GET) receipts. Efforts to capture federal economic stimulus funding should be included. More details on factors influencing the availability and likelihood of federal aid should be provided. Changes in the tax base due to increased investment and construction of capital facilities such as stations and other improvements should also be described. The impact of

increased access to improved transportation services on commercial and residential property values and the resulting increases in tax revenues should also be included. The potential for tax increment financing, improvement or benefit districts or other strategies for value capture should also be described. More discussion of fare policy should also be included in the DEIS. The cross-elasticity of transit fares as a function of changes in other transportation costs (bus, private automobile, etc.) should also be provided. A more coherent description of farebox revenues in the short-term as well as over the life of the project alongside articulation of transit fare policies should be provided.

The project's cash flow analysis anticipates the use of local funds for the first construction phase and a combination of local and federal funds for the remaining phases. The project should not begin until the full extent of federal funding is known in writing as part of the next Transportation Act of Congress. Additionally, the project should not start until a substantial portion of the federal funding (e.g., a portion that covers half of the cost of the first construction phase) has been actually released for the project.

Rail Travel Time Discrepancies

The DEIS clearly specifies that Kapolei-to-downtown travel time by rail is 50 to 54 minutes. This travel time estimate was clearly known in August 2008. Yet in September 2008 the City mailed all residents a large eight-page brochure the centerfold of which states that Kapolei to Ala Moana Center by rail will be 40 minutes. Why the discrepancy in figures?

Rail Extension

A Supplemental DEIS is needed to address the route beyond Ala Moana Center as the public's understanding of the project is of a rail system from Kapolei to UH with service to Waikiki. A Supplemental DEIS is required to assess the impacts for the whole corridor.

Two related observations from the supplementary report "Transportation Technical Report, Honolulu High-Capacity Transit Corridor are as follows:

> Figure 3-29 shows that rail line overflies the freeway near the University of Hawaii. This is a scenario that the city vigorously disclaimed in the September to November 2008 time frame but then it presents it in official documents.
>
> The Ala Moana Center station arrangement is a mystery. In the 20-mile plan, the station is approximately at the 3rd floor level. In the 30-mile plan the station is approximately at the 6th floor level. What is the exact plan for the Ala Moana Station and how can the guideway expand past the Ala Moana Center given the density, and height of buildings along Kona Street and Atkinson Drive? One reviewer suspects that roughly half a billion dollars would need to be expended to reconfigure (that is, to demolish and reconstruct)

the guideway alignment between Pensacola Street and Atkinson Drive, including the demolition of the 3rd floor station and the creation of a 6th floor station, if rail has any hope in reaching UH-Manoa or Waikiki via Kona Street.

TOD Potential

What is the impact of station generated traffic, noise and pollution to Transportation Oriented Development (TOD) potential and TOD plans? Where is the discussion and assessment?

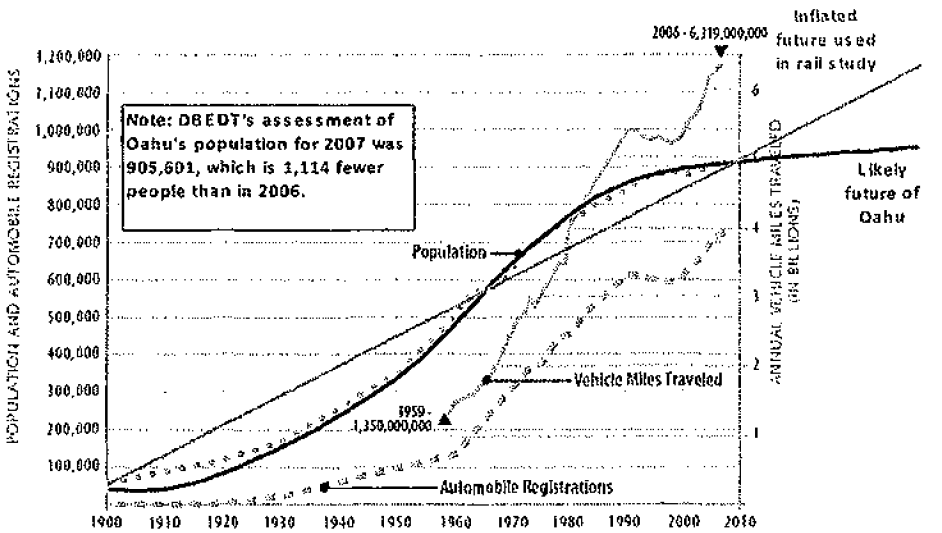
Peak Hour Screenline Level-Of-Service Methodology

In the Transportation Technical Report the peak hour screenline level-of-service methodology is described. The DEIS states, "To measure and describe the local roadway network's operational status, an LOS grading system was developed to describe a facility's operation, ranging from LOS A (free-flow traffic conditions with little or no delay) to LOS F (over-saturated conditions where traffic flows exceed design capacity, resulting in long queues and delays). The operation of the roadway segments was calculated by comparing traffic volumes on roadway facilities to the saturated volume LOS thresholds for each individual facility. The LOS is reported for each individual screenline facility, then weighted by traffic volumes to report overall operating conditions across each screenline."

This is an ad hoc method that is not a national standard. It is not appropriate to use the Highway Capacity Manual's LOS measure without using the HCM methodology. The HCM LOS for freeway screenlines is based on density and speed not on volume-to-capacity ratio. Furthermore, the volume to capacity "method" in the DEIS was wrongly applied in the Alternatives Analysis. The table below shows that general purpose traffic was estimated to be 31% above capacity (estimate of 1.31) but by their numbers, the correct estimate is 62.5% over capacity (estimate of 1.625.) Capacities are not revealed everywhere in the DEIS, so the reviewer cannot check the same calculations in the DEIS.

AA Table 3-12	2030 Rail				
Kalauao Stream Koko Head bound	20-mile Alignment Kapolei to Ala Moana Center				
	Revised Facility Capacity	Forecast Volume (vph)	Volume/ Capacity Ratio-AA	LOS	Correct volume/ capacity estimates
H-1 Fwy	9,500	17,209	1.811	F	
H-1 Fwy (HOV)1	1,900	2,740	1.442	F	
H-1 Fwy (Zipper) 1	1,900	2,241	1.179	F	
Moanalua Rd	1,700	853	0.502	A	
Kamehameha Hwy	3,450	3,059	0.887	D	
Managed Lane					
Total General Purpose Traffic	14,650	21,121	1.310	F	1.625 24%
Total HOV Traffic	3,000	4,981	1.310	F	1.324 1%
		26102			

DEIS (from Technical Report Appendix C Table C-3)	2030 with First Project Salt Lake Option				
Kalauao Stream Koko Head bound	2030 Facility Capacity DEIS	Forecast Volume (vph)	Volume/ Capacity Ratio-2	LOS	Correct volume/ capacity estimates
H-1 Fwy	9,500	12,170	1.281	F	
H-1 Fwy (HOV)1	1,900	1,640	0.863	E	
H-1 Fwy (Zipper) 1	1,900	1,460	0.768	D	
Moanalua Rd	1,700	1,290	0.759	D	
Kamehameha Hwy	3,450	2,350	0.681	E	
Managed Lanes					
Total General Purpose Traffic	14,650	15,810	1.08		1.149
Total HOV Traffic	3,800	3,100	0.82		0.819
		18910			
		28%			errors



Source: City and County of Honolulu Department of Business, Economic Development and Tourism, 2007.

Figure 3-1: Historic Trends in Population, Vehicle Ownership, and Vehicle Miles Traveled for O'ahu

Thank you for the opportunity to review this Draft EIS.

Sincerely,

Peter Rappa
Environmental Review Coordinator

cc: OEQC
Karl Kim
Panos Prevedouros
Evelyn Cox
Ryan Mielke, UHWO
James Moncur, WRRC
Ryan Riddle

DEPARTMENT OF TRANSPORTATION SERVICES

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DEPUTY DIRECTOR

June 11, 2010

RT2/09-299099R

Mr. Peter Rappa, Environmental Review Coordinator
Water Resources Research Center
University of Hawaii at Manoa
2500 Dole Street, Krauss Annex 19
Honolulu, Hawaii 96822

Dear Mr. Rappa:

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

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

General Comments

Environmental, social, and economic benefits and costs associated with the Project are covered in Chapters 4 and 6 of the Draft and Final EISs. Energy use is covered in Chapter 4 as well. Chapter 26 of the Design Criteria for the Project stations includes language on sustainability. This chapter states as a major objective of the Project that design of station sites, stations, buildings, the guideway, and ancillary structures shall be based on sustainable design approaches, methods of construction, and selection of materials.

Alternatives Considered

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

The Alternatives Screening Memorandum (DTS 2006a) recognized the visually sensitive areas in Kakaako and Downtown Honolulu, including the Chinatown, Hawaii Capital, and Thomas Square/Honolulu Academy of Arts Special District. To minimize impacts on historic resources, visual aesthetics, and surface traffic, the screening process considered 15 combinations of tunnel, at-grade, or elevated alignments between Iwilei and Ward Avenue. Five different alignments through Downtown Honolulu were advanced for further analysis in the Alternatives Analysis, including an at-grade portion along Hotel Street, a tunnel under King Street, and elevated guideways along Nimitz Highway and Queen Street (Figure 2-4).

The Alternatives Analysis Report (DTS 2006b) evaluated the alignment alternatives based on transportation and overall benefits, environmental and social impacts, and cost considerations. The report found that an at-grade alignment along Hotel Street would require the acquisition of more parcels and could potentially affect more burial sites than any of the other alternatives considered. The alignment with at-grade operation Downtown and a tunnel under King Street, was not selected because of the environmental effects, such as impacts to cultural resources, reduction of street capacity, and property acquisition requirements of the at-grade and tunnel sections, which would cost an additional $300 million.

The Project's purpose is "to provide high-capacity rapid transit" in the congested east-west travel corridor (see Section 1.7 of the Final EIS). The need for the Project includes improving corridor transit mobility and reliability. The at-grade alignment would not meet the Project's Purpose and Need because it could not satisfy the mobility and reliability objectives of the Project (see bullets below). Some of the technical considerations associated with an at-grade versus elevated alignment through Downtown Honolulu include the following:

- ***System Capacity, Speed, and Reliability**—The short, 200-foot (or less) blocks in Downtown Honolulu would permanently limit the system to two-car trains to prevent stopped trains from blocking vehicular traffic on cross-streets. Under ideal operational circumstances, the capacity of an at-grade system could reach 4,000 passengers per hour per direction, assuming optimistic five minute headways. Based on travel forecasts, the Project should support approximately 8,000 passengers in the peak hour by 2030. Moreover, the Project can be readily expanded to carry over 25,000 in each direction by reducing the interval between trains (headway) to 90 seconds during the peak period. To reach a comparable system capacity, speed, and reliability, an at-grade alignment would require a fenced, segregated right-of-way that would eliminate all obstacles to the train's passage, such as vehicular, pedestrian, or bicycle crossings. Even with transit signal priority, the at-grade speeds would be slower and less reliable than an elevated guideway. An at-grade system would travel at slower speeds due to the*

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

- ***Mixed-Traffic Conflicts***— *The Project will run at three minute headways. However, three-minute headways with an at-grade system would prevent effective coordination of traffic signals in the delicately balanced signal network in downtown Honolulu. A disruption of traffic signal cycle coordination every three minutes would severely affect traffic flow and capacity of cross-streets. Furthermore, there would be no option to increase the capacity of the at-grade rail system by reducing the headway to 90 seconds, which would only exacerbate the signalization problem. An at-grade system would require removal of two or more existing traffic lanes on affected streets. This effect is significant and would exacerbate congestion. Congestion would not be isolated to the streets that cross the at-grade alignment but, instead, would spread throughout Downtown. The Final EIS shows that the Project's impact on traffic will be isolated and minimal with the elevated rail, and, in fact will reduce system-wide traffic delay by 18 percent compared to the No Build Alternative (Table 3-14 in the Final EIS). The elevated guideway will require no removal of existing through travel lanes, while providing a reliable travel alternative. When traffic slows, or even stops due to congestion or incidents, the elevated rail transit will continue to operate without delay or interruption.*

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

- ***Construction Impacts***—*Constructing an at-grade rail system could have more effects than an elevated system in a number of ways. The wider and continuous footprint of an at-grade rail system compared to an elevated rail system (which touches the ground only at discrete column foundations, power substations, and*

station accessways) increases the potential of utility conflicts and impacts to sensitive cultural resources. In addition, the extra roadway lanes utilized by an at-grade system would result in increased congestion or require that additional businesses or homes be taken to widen the roadway through Downtown. Additionally, the duration of short-term construction impacts to the community and environment with an at-grade system would be considerably greater than with an elevated system. Because of differing construction techniques, more lanes would need to be continuously closed for at-grade construction and the closures would last longer than with elevated construction. This would result in a greater disruption to business and residential access, prolonged exposure to construction noise, and traffic impacts.

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

The elevated system provides fast and reliable service without pedestrian or vehicle conflict and interfaces with the surrounding community at each station. The need for an elevated system is not dependent on automated operation. The Final EIS presents the costs and effects of constructing an elevated system.

The Final EIS in Chapter 2 addresses alternatives considered and rejected. The Transportation System Management (TSM) Alternative studied during the Alternatives Analysis phase increased bus service. The alternative included express bus service that operated as bus rapid transit in existing facilities. Bus frequencies would have been increased during peak periods to provide improved service for work-related trips, particularly from developing areas. The bus fleet was assumed to increase from 525 to 765 buses, and park-and-ride lots were assumed at West Kapolei, UH West Oahu, Waipio, and Aloha Stadium. The TSM would have improved transit travel times but it would have done little to improve corridor mobility and travel reliability. Roadway congestion also would not have been alleviated. Light rail transit (LRT) is also subject to the effects of traffic congestion even though it can generally manage its progress better than a bus. The challenge with LRT is that it has significantly lower capacity than the elevated guideway and is subject to the limitations of the local street system (i.e., cross-traffic, pedestrians, bicyclists, etc.). It also takes away existing roadway capacity which the elevated guideway does not.

The primary performance differences of the elevated guideway compared with any other choice studied are a significantly higher system capacity, shorter travel times, and overall higher reliability, as stated above. None of those can be matched by light rail or buses. The much higher performance and lower overall impact is the reason the City Council supported the elevated option in December 2006.

The electric grid is controlled by a private corporation, not the City and County of Honolulu. As stated in Section 4.11.3 of the Final EIS, HECO has stated they can readily

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

Draft EIS Base Travel Times

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

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

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

Alternatives and Technologies Considered

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

Methodology

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

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

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

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

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

methodology is appropriate for the arterial-level intersection analysis conducted in this study. The results from the use of the HCM methodology provide an accurate representation of the potential traffic impacts that result from the Project.

Future Conditions and Effects: No Build Alternative

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

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

Transit Ridership

The travel forecasting results were generated in accordance with consultation with the Federal Transit Administration (FTA). This guidance must be followed to qualify for consideration under the Federal New Starts funding program. The travel forecasts employ the OahuMPO four-step model that has been used for other recent transportation forecasting efforts on the island. Refinements completed between the Draft EIS and the Final EIS to account for airport visitor trips and non-home-based direct demand trips resulted in the ridership figures presented in the Final EIS. The data relied upon for the forecasts are based on the latest available from the OahuMPO. The transit ridership figures are the result of a refinement of the mode choice model based on an on-board survey completed in 2005 which has been calibrated and validated to conditions in the corridor. The mode choice model is specifically defined for the Honolulu transit corridor to account for all transit activities (TheBus as well as fixed guideway) such as boardings/alightings and all access modes to individual stations. These are presented for each station in Figures 3-9 and 3-10 and Table 3-20 of Chapter 3 in the Final EIS, respectively. Further information about the travel forecasting model is available in the Honolulu High-Capacity Transit Corridor Project Model Development, Calibration, and Validation Report (RTD 2009k) and the Honolulu High-Capacity Transit Corridor Project Travel Forecasting Results and Uncertainties Report (RTD 2009l). Both of these reports are available on the Project website (www.honolulutransit.org) and from DTS.

Pedestrian activity is identified as it relates to the use of the transit system. Short pedestrian trips, such as travel from an office to lunch, do not affect the function of the Project and are therefore not assessed. Pedestrian activity that is part of the use of the larger system is identified, such as pedestrian access to a rail station or a bus stop.

The EIS uses the socio-economic data that was available from OahuMPO at the time that the EIS work began, based on DBEDT's "Population and Economic Projections for the State of Hawaii to 2030" prepared in August 2004. The 2030 forecast year used in the EIS is consistent with FTA guidance for New Starts projects.

As the comment notes, DBEDT has prepared new forecasts at the County level, "Population and Economic Projections for the State of Hawaii to 2035" issued in January 2008. For use in travel forecasting these County-level forecasts must be disaggregated to the level of "Travel Analysis Zones" of which there are 764 on Oahu. At the time of the publication of the Draft EIS, these zonal-level forecasts had not been prepared and accepted by OahuMPO. That occurred in early 2009, by which point, there was insufficient time to rerun the model with the new forecasts.

The comment notes that the January 2008 DBEDT forecasts have lower population projected than the August 2004 forecasts. Specifically, the January 2008 population forecast for Oahu for 2030 is 3.3 percent lower than the August 2004 forecast. However, the 2030 employment forecast for Oahu from the January 2008 forecasts is 5.8 percent higher than the August 2004 forecast. Thus, it is not clear what the effect on ridership projections would be of using the January 2008 forecast, since the higher employment forecast would likely result in more work trips which are attractively served by transit, while the lower population forecast would likely result in fewer trips for other purposes.

There are 11 separate trip purposes in the OahuMPO travel demand model used in forecasting ridership and travel behavior. They are relied upon to describe trip-making behavior among users of the transportation system, including users and non-users of the fixed guideway. This information is detailed in the Oahu Metropolitan Planning Organization, December 17, 2002 guide to model form (included within the final documentation for the Travel Forecasting Model Development Project), which is available on the Project website.

As discussed in Section 3.4.2 of the Final EIS, research indicates that positive attributes (both perceived and real) are associated with the use of a fixed guideway system, thereby making the system more attractive than general bus transit. These benefits include such features as improved safety, security, visibility, convenience, speed, comfort, financial savings, and reliability. These features or attributes are not captured by the standard travel demand forecasting process. Transportation System User Benefits captures a set of benefits to transit riders—including reductions in walk times, wait times, ride times, number of transfers, and costs (converted to time)—in terms of savings in travel time. The main factors in determining benefits are travel time and cost. User benefits are measured in minutes and are a summary measure that incorporates travel-time and cost changes for all modes.

As shown in Figure 3-5, there will be positive user benefits for communities with high concentrations of transit-dependent households (greater than 25 percent of households without automobiles or where 25 percent or more of residents are unable to drive), as well as other defined groups within communities of concern. Data collected and used as indicators for these communities of concern include linguistically isolated households, transit-dependent populations, and areas with public housing and community services. Substantial positive user benefits for communities of concern are shown in or near Waipahu, Pearl Harbor Naval Base,

and Ala Moana Center. Overall, many communities of concern receive positive benefits from the Project. No community of concern will experience negative user benefits. Those areas with high transit dependence, such as Waipahu, Pearl City, Aiea, Kalihi, Iwilei, Chinatown, Downtown, Kakaako, Ala Moana, and Waikiki, as shown in Figure 3-5, benefit from more than 35 percent of the total user benefits.

As stated in Chapter 4, Section 4.7.3 of the Final EIS "effects of the Project also will result in benefits to transit users. These benefits include increased transit options, improved mobility, proximity to transit links, and access to expanding employment opportunities. As Chapter 3 illustrates, traffic and transit performance will improve within the study corridor, and these benefits can be realized by all populations. There are 21 stations proposed for the Project. Nine are in, or adjacent to, OahuMPO Environmental Justice (EJ) Areas. Therefore, people living in OahuMPO EJ Areas will have the same opportunity to access the transit and mobility improvements." As discussed in Section 2.5 of the Final EIS, all buildings, facilities, and vehicles will conform to applicable Federal, State, and County accessibility guidelines and standards, including Americans with Disabilities Act (ADA) Accessibility Guidelines. The law further requires all plans and specifications prepared for construction of State or County government buildings, facilities, and sites to be reviewed by the Disability and Communication Access Board for conformance to those guidelines and standards. The design criteria for stations call for pedestrian access to be as direct and safe as possible and shall be accessible in accordance with ADA. All guideway platforms will be high level (at the same level as the vehicle floor) to provide level boarding for all passengers and to accommodate wheelchairs. The criteria also state that buses and Handi-Van vehicles shall be given priority for vehicle access in terms of their proximity to station entrances. Each station will have escalators and elevators accommodate elderly and disabled riders.

The scale of the maps in the Draft and Final EIS was selected to appropriately illustrate the effects of the project. Where effects are compared at a corridor-wide level, then overview maps were provided; where the effects are location specific, such as effects to community resources, then more detailed maps were provided, such as Figures 4-9 through 4-12 in the Draft EIS.

Based on FTA directive, the travel demand forecasting model does not account for potential increases in ridership resulting from transit-oriented development (TOD) or changes to land use as a result of the fixed guideway project. The capacity calculations presented for the fixed guideway system only consider the basis for the analysis provided, not the full capacity of the system. The fixed guideway is planned to operate with two- or three-car trains with a capacity of between 325 and 500 passengers each. At three-minute headways during the peak period, that provides capacity for over 8,500 passengers per peak direction per peak hour. This figure applies in both directions for a total system capacity of over 17,000 passengers per peak hour. The full capacity of the fixed guideway with four-car trains and 90 second headways is over 25,000 passengers per hour per direction or over 50,000 passengers total. Accordingly, the fixed guideway system could be expanded to accommodate any increases in ridership resulting from TOD or other land use changes as a result of the Project.

As indicated in Chapter 2 of the Final EIS, bus service will be enhanced with the Project, and the bus network will be modified to coordinate with the fixed guideway system. Some

existing routes, including the peak-period express buses, will be altered or eliminated to reduce duplication of services provided by the fixed guideway system. Existing and future bus routes, including route numbers and frequencies, are shown in Appendix D of the Final EIS.

Effects on Parking, Bicycle and Pedestrian Facilities, and Freight

Currently, public transit complements non-motorized travel since many of those biking and walking use the bus service as part of their trip. The availability of bike racks on buses is an example of how these modes complement each other. As stated in Section 3.3.2 of the Final EIS, according to the on-board survey conducted in December 2005 and January 2006, 88 percent of passengers walked to access TheBus. The on-board survey revealed that 1 percent of passengers accessed TheBus by bicycle. More than 1,000 bikes are taken on TheBus daily for a monthly average of about 30,000 bikes (OTS 2009).

With the Project, the extent and distribution of bicycle and pedestrians trips would be substantially enhanced. As shown in Table 3-20 in the Final EIS, 30 percent of trips to fixed guideway stations will be by walking and bicycling. Overall, transit travel times will be reduced along the affected corridor thereby providing improved mobility for those bicyclists and pedestrians using public transportation. The enhancement of non-motorized travel demand with the Project would also be reinforced through station design features. As stated in Chapter 2 of the Final EIS (Section 2.5.5), design criteria developed for Project stations place highest emphasis on walk and bicycle access. Pedestrian access to stations, including accessible routes, shall be given first priority for reasons of safety. The design criteria also state that, as a non-motorized mode, bicycles will be given second priority and will be placed over all motorized vehicular access to Project stations.

As stated in Section 3.4.5 of the Final EIS, the Oahu Bike Plan is currently being updated. The draft update includes a prioritized list of bicycle projects developed using criteria that include access to transit. Several projects that would connect existing or future bicycle facilities to rail transit stations are included in the draft update. Outside station areas, the Project does not propose to independently restructure the plans for the bicycle and pedestrian systems in Honolulu.

Environmental Analysis, Consequences and Mitigation

The energy analysis, shown in Table 4-21 of the Final EIS, indicates that the Project will reduce overall transportation energy requirements by approximately 3 percent with the Project. Based on this, it is expected that the Project will have a beneficial impact on greenhouse gas emissions, as discussed in Section 4.9 of the Final EIS. Indirect effects to development patterns are addressed in Section 4.19 of the Final EIS.

Table 3-14 of the Final EIS provides the direct benefits to the transportation system of reducing automobile demand. These benefits are reflected in the Chapter 4 analyses to resources such as water quality, air quality, and energy use. Based on your comment, the indirect benefits to individual automobile users have been added to Section 3.6.1 of the Final EIS.

The energy and other resource requirements for construction are included in Section 4.17 of the Draft EIS. This material is further summarized in Section 4.19 of the Draft EIS. A life-cycle approach was not performed for the impact analysis for this project because there is no life cycle quantification for the No-Build Alternative. The amount of material for the various Build Alternatives is approximately the same so that a life-cycle approach does not differentiate between alternatives. The No Build Alternative would not meet Purpose and Need for the Project.

The Final EIS provides an estimate of transportation energy use for the Project. The trade-offs between what vehicle type uses the energy is not relevant to the total energy consumed.

In response to your comment, additional indirect health benefits related to level of activity have been added to Section 4.19 of the Final EIS. Indirect effects from reduced vehicle miles traveled, including a decrease in automobile accidents, has been added to Section 3.6.1 of the Final EIS.

Land Use

Section 4.19 of the Final EIS addresses indirect effects to development. The Project's primary indirect effect would be to alter development near the stations, bringing higher densities than presently planned or could otherwise be developed near transit stations. These land use effects could take the form of TOD or Transit-Supportive Development (TSD). If development occurs around stations, it is anticipated that City infrastructure would be improved in these areas. As mentioned in Section 4.19.2 of the Final EIS, TOD would be expected to occur in project station areas as an indirect effect of the Project. The increased mobility and accessibility afforded by the Project may increase the desirability and value of land near the stations, thereby attracting new real estate investment nearby (in the form of TOD). Planning and zoning around station areas will be conducted and established by the City's Department of Planning and Permitting under a process covered by the City's new TOD ordinance.

Regarding reducing suburban sprawl and preserving green space, farmland and carbon sequestration, Section 4.19.2 of the Final EIS also discusses the following: "At the study corridor level, the Project will support the development programmed in the Ewa Development Plan (DPP 2000), Central Oahu Sustainable Communities Plan (DPP 2002b), and Primary Urban Center Development Plan (DPP 2004a)."

These plans show development concentrated in existing travel corridors, therefore protecting green space and farmland. New growth is expected in the transit corridor, as explained in the Draft EIS. The combination of public land use policy in the above plans and the expected increase in density of development in the transit corridor may help to reduce suburban sprawl.

Economic Activity

The Final EIS references several economic studies that address the local construction economy. They include an assessment of the local labor supply, material availability,

competition for resources, and forecast cost escalation. Another study addresses the impact of project construction on employment, economic output, and earnings. Additionally, more in-depth economic analysis of the potential development impacts of the project can be found in the Economics Technical Report (RTD 2008c), which is a supporting document to the EIS and available on the Project website.

There is no direct relationship to other projects such as the Nimitz Flyover. Both projects will avail themselves of similar labor pools and materials sources. Both projects will be competitively bid. The fixed guideway project plans to begin construction in 2010, so economic conditions may be similar to now though indications are they will improve over the course of the project construction period.

Details of construction data such as costs of materials and costs of acquiring the materials can only be estimated. In Hawaii, some products must be imported as they are not available on the islands. Recognizing this, the Project has assessed the likely availability and escalation of critical commodities over the project construction period in developing Project cost estimates. The specifics of final costs related to the Project will be the purview of the contracting community who will be competitively selected to build the Project.

Every effort is being made to maintain as much of the economic benefit on the island and the expectation is that most of it will remain here. It is most likely to be more economically competitive to use local resources when possible. On the other hand, while there is some limited control over resources, most of the final decision-making about where to find materials and labor will rest with the competitively selected contractor for each project.

Section 4.18.1 of the Final EIS shows the anticipated job creation for the Project. The construction sector will most likely be the biggest beneficiary in the short term, but many industries that support the construction industry will also benefit. Most of the major construction work is similar to other roadway, bridge or building construction for which there is ample labor available locally based on discussions with local labor representatives. A few key positions with specialized expertise may need to be imported. Since most of the labor will be local and paid for at local wage rates, the benefit and all that stems from it will accrue locally to the advantage of local businesses and the local community. For those items unavailable on Oahu, such as vehicles and some raw materials, at least a portion of the benefit will leave the island. The percentage will vary depending on whether any elements not typically provided on the island could be brought here (e.g., assembling vehicles on Oahu instead of California or Japan). This decision will most likely be made by what is most cost-effective for the Project and the competitively-selected contractor/vendor that provides the specialty items.

Energy and Electric and Magnetic Fields

Section 4.11.3 of the Final EIS notes the Project will consume approximately 1 to 2 percent of the total projected electricity generated on Oahu in 2030. According to the Hawaiian Electric Company (HECO), the planned electricity generation capacity on Oahu will be sufficient to support the transit system, but the electricity distribution system will require various upgrades to support the system.

Maintenance and Storage Facility

Rail vehicles will be delivered from the port to the maintenance yard by truck. Final vehicle assembly will be completed on-site. Clearance is sufficient to access the site.

Cash Flow Analysis

Efforts have been made to secure stimulus funding and the City expects to receive $4 million in stimulus funding once the Project enters Preliminary Engineering. Section 4.3 of the Final EIS discusses the economic effects of the Project and addresses the likely enhancement of tax base as a result of the Project (as well as the loss of tax base). Specific estimates of value at this stage would be purely speculative. In Chapter 6 of the Final EIS, more information is presented about other potential sources of revenue that could contribute to Project funding.

Section 4.19.2 of the Final EIS addresses the effects of the Project on property values. It is recognized that there is a likely upward effect on tax revenues as a result of improved access and proximity to the fixed guideway. The specific increases in value, at this stage, would be purely speculative. As noted in the comment, the opportunity raises the potential for tax increment financing or other special district financing. The potential of these options is detailed in Section 6.6, of the Final EIS.

The farebox policy and the associated revenues are described in Chapter 6 of the Final EIS. The City requires that between 27 and 33 percent of the operating and maintenance costs of the transit system be covered from farebox revenues. The assumption is that such a policy will remain in effect throughout the time horizon covered in the EIS. Increases in gas prices have led to significant increases in demand for transit in Hawaii and around the country.

Obtaining a Record of Decision (ROD) for the EIS is a good indicator of the project's ability to effectively compete for federal funding. The Project cannot begin prior to obtaining a ROD and count on federal funding for any work completed prior to the ROD. The City will not authorize work until a ROD is received. Waiting until later to collect additional funds will make the Project more expensive as the costs will rise over time. Chapter 7 of the Final EIS summarizes the FTA's evaluation of the Project.

Rail Travel Time

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

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

Rail Extension

The Project has logical termini at East Kapolei and Ala Moana Center and independent utility from any extensions that may be constructed in the future. The future extensions to West Kapolei, Salt Lake Boulevard, Waikiki, and UH Manoa are discussed in the cumulative impacts sections of Chapters 3 and 4 of the Final EIS. However, the future extensions are not part of this Project; thus, they are not required to be evaluated under Chapter 343 of the Hawaii Revised Statutes and NEPA. Under NEPA, environmental analysis is only required when there is a proposed action by a Federal agency. Here, because the future extensions are not proposed for implementation at this time, they are not part of the Project studied in the Final EIS. It would be premature to undertake an environmental analysis of the extensions (beyond the cumulative impacts analysis) because they are not part of the proposed action to be taken by the City and FTA. If the future extensions are proposed for implementation in the future, environmental analysis of the extensions and appropriate alternatives will be undertaken at that time.

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

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

The Project terminates at Ala Moana Center with a station platform approximately 35 feet above ground level. If a future extension is constructed beyond the center, it is proposed that service that terminates at Ala Moana Center would use the lower platform, while through service would use the upper platform. Riders going towards UH or Waikiki would use the upper platform, while those traveling Ewa could use either platform.

TOD Potential

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

The analysis of direct impacts of the Project is focused on construction and operation of rail transit service. However, as discussed in Section 4.19.2 of the Final EIS, transit-oriented development (TOD) is expected to occur in project station areas as an indirect effect of the Project. The increased mobility and accessibility that the Project will provide may also increase the desirability and value of land near stations, thereby attracting new real estate investment nearby (in the form of TOD). Planning and zoning around station areas will be conducted and established by the City's Department of Planning and Permitting under a process covered by the City's new TOD Ordinance 09-4.

Peak Hour Screenline Level-of-Service Methodology

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

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

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

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

UNIVERSITY of HAWAI'I® SYSTEM

Office of Capital Improvements

February 4, 2009

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

Subject: Comments on the Honolulu High-Capacity Transit Corridor Project - Draft EIS

Dear Mr. Yoshioka:

The University of Hawai'i continues to support the Honolulu High-Capacity Transit Corridor Project as being an integral part of the multi-modal transportation solution to serving the needs of the University campuses on O'ahu as well as the larger O'ahu community.

We thank you for the opportunity to provide the attached comments from three of our campuses, University of Hawai'i at Mānoa, Leeward Community College and Honolulu Community College. We look forward to working closely with your planning and design team in assuring that all of our O'ahu campuses are adequately served.

Sincerely,

Brian K. Minaai
Associate Vice President for Capital Improvements

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DIRECTOR'S OFFICE
DEPT. OF
TRANSPORTATION SERVICES

Attachments

c: Chancellor Virginia Hinshaw
Vice Chancellor Kathy Cutshaw
Chancellor Manny Cabral
Vice Chancellor Mark Lane
Chancellor Michael Rota
Executive Assistant Brian Furuto

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LEEWARD
COMMUNITY COLLEGE

January 31, 2009

To: Brian Minaai, Associate Vice President for Capital Improvements

From: Mark Lane, Vice Chancellor of Administrative Services

Subject: Draft Environmental Impact Statement – Honolulu High-Capacity Transit Corridor Project (HHCTCP)

Leeward Community College (LCC) has reviewed the Draft Environmental Impact Statement (DEIS) for the Honolulu High-Capacity Transit Corridor Project (HHCTCP) and submits the attached comments for your inclusion in the formal response by the University of Hawaii to the City and County of Honolulu's Department of Transportation Services (DTS). We would like to preface our comments by voicing our continuing support for the HHCTCP as being an integral part of the multi-modal transportation solution for our island residents. All components of this project that impact Leeward Community College (LCC) can certainly be mitigated. We look forward to working with you as we pursue mutually acceptable solutions with DTS officials and others in order to address the needs of the College's students, faculty, staff, and community.

As you know, LCC is the third largest of the UH 10-campus system, with an enrollment of nearly 7,000 students. In addition, LCC is considered a regional community asset with special events and performances that draw in excess of 100,000 patrons per year. Yet the campus is accessible by one (1) ingress and egress point. This makes the health and safety of all campus visitors, whether students or community members, a top institutional priority. Adding more development to this area, such as a rail station and rail system maintenance and storage facility, on the limited roadway network that presently exists requires thoughtful consideration as there are direct impacts to the LCC campus. On balance however, we do believe that the HHCTCP, combined with the LCC Second Access Road project, offers opportunities that would help remedy the campus access issue for the foreseeable future.

For your information, the campus continues on-going dialogue with engineers and planners connected with the HHCTCP. Our next meeting with HHCTCP officials is scheduled for February 19th, from 1:30 to 3:30 on the LCC campus. I would like to extend an invitation to you, Mike Unebasami, and/or your designated representatives to attend this meeting. I will forward an agenda to you as soon as it is available.

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Pearl City, Hawai'i 96782
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We respectfully submit these comments to you for inclusion in the UH response to the DEIS. Should you have any questions or require further clarification of our statements, please feel free to contact me at your convenience. Thank you, Brian.

cc: Manny Cabral, Chancellor Leeward CC
John Morton, Vice President, UHCC
Mike Unebasami, Associate Vice President, UHCC
Brian Kashiwaeda, Director of Facilities Planning, UHCC
Kay Caldwell, Campus Council Chair, Leeward CC
Linda Musto, Faculty Senate Chair, Leeward CC
Stu Uesato, Counselor and Student Government Advisor, Leeward CC

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UNIVERSITY of HAWAI'I
LEEWARD
COMMUNITY COLLEGE

January 31, 2009

Draft Environmental Impact Statement (DEIS) Comments
Honolulu High-Capacity Transit Corridor Project (HHCTCP)

1. Vehicle and Maintenance Storage Facility

The Navy Drum Storage site, located directly Ewa of the campus, is one of two possible locations for the project's vehicle and maintenance storage facility. It is likely that this site will be selected due to its central island location and rail accessibility points from both the Ewa and Koko Head directions. In addition, this site would be in the first phase of the construction schedule due to the fact that testing of the rail system could not be conducted without the completion and access to this facility. The vehicle and maintenance storage facility would include several buildings for administration, a system control center, and employ approximately 150 people. It would include tracks for train storage and maintenance and the facility would be in operation 24 hours a day.

At the present time, the only access to/from the site would be by way of Waiawa and Ala Ike roads. This is also the only access to the campus. A permanent second access road to the vehicle and maintenance storage facility and LCC should be provided to ensure for adequate and safe vehicular movement and to address potential health and safety reasons should the need ever arise to evacuate the campus or the vehicle and maintenance storage facility due to man-made or natural emergencies. The Second Access Road Project's environmental assessment (conducted by the State Department of Transportation) was completed in January 2008 and construction of this roadway is imperative in order to serve the needs of the community, the current and expanding enrollment at the College, and future development of the vehicle and maintenance storage facility. The preliminary plans by the C&C for the vehicle and maintenance storage facility would complete approximately one half the length of the Second Access Road. Funding of the remaining roadway project to the Waipio Point Access Road should be a top priority.

Completion of the Second Access Road would fulfill the access needs identified in the original master plan of the College which was completed in 1966. Without this roadway, the students, faculty, staff, community, and in the future, the employees and contractors associated with the HHCTCP, will continue to see an increase in the time necessary to move to/from the area and navigate the bottleneck that is created several times per day at the intersection of Farrington and Kamehameha Highways with Waiawa Road.

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In addition, according to the DEIS, the vehicle and maintenance storage facility may be used as a staging area for various phases of the HHCTCP construction. Without the Second Access Road project, this would continue to add increased truck and vehicular traffic and hasten the deteriorating conditions of the existing Ala Ike and Waiawa roadway infrastructure.

Other campus concerns regarding the vehicle maintenance and storage facility include:

a) LCC Observatory Impacts: That lighting within the complex and associated track/roadway network is compatible with night time viewing from the LCC observatory complex.

b) Perimeter Boundaries: That appropriate and secure perimeter boundaries around the complex and adjacent to the campus are created with sufficient lighting, fencing, and landscaping in order to reduce the threat of vandalism and property damage.

c) Air Quality: That during the construction phase of this complex, that adequate measures and safeguards be taken to ensure that dust and other particulate matter is not released into the air. The Ewa side of the LCC campus, closest in proximity to the complex, contains our Native Hawaiian plant collection, automotive instructional facility, and an indoor/outdoor daycare facility. Air quality is of utmost importance. The campus requests that frequent air sampling tests be conducted during the construction phase of the complex.

2. <u>LCC Transit Station</u>

The HHCTCP plan includes the construction of a rail transit station on the Ewa side of the LCC campus. This is not a park-and-ride station/stop. The rail line would enter the LCC campus from the Ewa side of the property line, cross the LCC Ewa service road, and stop at the transit station situated on a parking lot that is home to four (4) portable buildings. These buildings are currently in use by the LCC Office of Continuing Education and Workforce Development (OCEWD – 3 buildings) and the University of Hawaii-West Oahu's (UHWO) Center for Labor, Education, and Research (CLEAR – 1 building). The rail line would then continue on a Koko Head direction, across an LCC parking lot, then crossing Ala Ike before traversing the H1/Farrington/Kamehameha highways. In order to construct the transit station, the C&C would have to acquire 3.94 acres of land from LCC and the UH. The transit station platforms would be approximately 300 feet in length.

Campus concerns regarding the transit station include the following:

a) LCC Portable Buildings: The three (3) OCEWD portable buildings comprise approximately 5,500 gross square feet of space. These buildings house the LCC continuing education and workforce development administration, instruction, and support facilities. This community and public service program serves more than

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3,800 students during the year through their various academic, workforce, and personal enrichment programs. Elimination of these buildings would require that suitable facilities are provided on the LCC campus in order to continue uninterrupted offerings of credit and non-credit programs to our students. This is also a revenue generating unit of LCC and as such closure or elimination of any program due to lack of adequate space or facilities has a direct impact on the campus operating budget.

b) UHWO Portable Building: The other displaced portable building is related to the UHWO's Center for Labor, Education, and Research. LCC will defer all DEIS comments related to the impact of the transit station on this facility to the UHWO administration.

c) Programmatic Impacts: Elimination of the parking lot near the OCEWD building complex will also eliminate the LCC motorcycle range lot and the forklift training site. This has a direct impact on the campus' ability to deliver these programs and services. Replacement facilities for these two programs are necessary. Without replacement facilities, the campus stands to lose its largest non-credit revenue generating program and will be required to terminate employment of instructors.

d) Parking Impacts: According to the preliminary HHCTCP plans, the LCC campus would lose up to 180 parking stalls. This problem is even more profound given the fact that enrollment at LCC is at record levels. On-campus parking solutions must be found, especially during the construction phase of the project and up until the time that the rail system is actually operational. Replacement of the lost parking stalls can be mitigated by constructing a paved parking area in the overflow parking area on the makai side, or lower campus, area. Service road improvements would also be required.

e) Roadway Impacts: The rail line will cross Ala Ike and the Ewa service road as trains enter/exit the campus boundaries. These roadways provide the only access to the lower campus facilities and services. It is critical that during the construction phase of the rail station, that access to the lower campus, either by these roadways or a campus-approved alternative, be maintained. Lower campus access is required for; daycare drop-off/pick-up services, emergency/medical vehicular access, contractor and building maintenance, observatory facilities, food service and bookstore deliveries, automotive instructional facility, nursing program facilities, the recreational court complex, and overflow parking.

f) Security Impacts: Since the LCC transit station is not associated with a park-and-ride lot, then riders who utilize the LCC stop will likely be members of the LCC community...either students, faculty, staff, or the public at large attending a special event, theatrical performance, or other like service or program. Insomuch that these services and programs are offered during set periods of the day, LCC will request that the transit stops be adjusted to coincide with the classes and activity schedule of the campus. It is requested that the transit station operational hours be restructured so that riders are not permitted to board or depart the rail line at LCC

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during the non-class or non-activity times. This will certainly assist with potential security, vandalism, and property damage issues to the campus, the vehicle and maintenance storage facility, and the local neighborhood residents.

g) Transit Station Ingress/Egress: Access to the station platforms will be via a station plaza and entrance ramp system of approximately 270' in length that would connect to the existing promenade walkway facing the mauka side of the Math and Science building. A rail system ticketing office is also planned at the entrance to the station. To ensure safe pedestrian (including ADA-related accommodations) access to/from the station, it is requested that the station walkways extend and connect to the existing LCC pedestrian corridors and walkways. It is not clearly evident from the preliminary plans or the DEIS that the two walkway systems are connected.

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Office of the Chancellor

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Memorandum

January 28, 2009

TO: Brian Minaai
Associate Vice President for Capital Improvements
University of Hawai'i System

THRU: Brian Furuto
Executive Assistant to the Chancellor
Honolulu Community College

FROM: Michael Rota
Interim Chancellor
Honolulu Community College

SUBJECT: HCC Comments on the Proposed Honolulu High Capacity Transit Corridor Project Draft Environmental Impact Statement

Below please find Honolulu Community College's (HCC) comments on the aforementioned Draft Environmental Impact Statement (DEIS). These comments represent an abstract of comments provided to me by the HCC faculty and staff. As the process moves forward and project details are made clear, we plan to request further input from HCC stakeholders, including our students.

It is important to note that the Kapalama Station, which will be located on land currently owned by the University of Hawai'i-HCC, is only one of five stations included in all variations of the rapid transit system plan. With a development of this magnitude it is essential for us to be informed and involved in all phases of the planning and construction. In prior projects led by the City and County of Honolulu we have found that we are often times either not informed appropriately, and forced to make last minute accommodations for the project, or involved enough to ensure that the campus continues to operate as seamlessly as possible and that the project can be efficiently and effectively completed.

In summary, the DEIS proposes the following:

- The Kapalama rail station will be located at the corner of Dillingham Boulevard and Kokea Street.
- The rail system will travel along the entire length of the HCC's Main campus along Dillingham Boulevard.

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Below please find Honolulu Community College's (HCC) concerns:

Health and Safety: The areas in and around the Main HCC campus, particularly along Kokea Street and the Kapalama Canal, are congested and hazardous for parkers, walkers, and drivers. The project will undoubtedly increase hazardous conditions, due to the higher volume of commuters and vehicles. It is unclear in the proposal whether sidewalks, road widening, or other safety measures are going to be implemented in parallel to the rail project to ensure the safety of our students, employees, and the general public. Liability will become an increasing concern as volume grows after the initial opening of the Kapalama Station.

Primary Campus Entrance and Parking: As noted above, parking along Kokea Street is at a premium. The proposed location for the Kapalama Station is immediately adjacent to the primary entrance and parking lot, Lot 1 (see Attachment A), for students, faculty and staff. It can be assumed that unauthorized vehicles will enter the campus through the Kokea Street entrance and park in Lot 1. The campus is not prepared from a funding or planning perspective to relocate the entrance or parking and given the fiscal condition of the State it is doubtful that we will receive such funding. It is unclear in the proposal whether funding from the project will be allocated for traffic abatement or the relocation of the entrance and parking lot. Again, liability will become an increasing concern as rider volume grows.

Traffic: Although the ultimate goal for the rail project is to decrease traffic congestion, in the current configuration, the roads (Dillingham Blvd, Kokea St., and Kohou St.) will become even more congested. The intersections of Kokea Street and Kohou Street on Dillingham Boulevard are extremely congested during peak traffic hours. The DEIS does not include information on whether the support structure will impact the existing lanes and alleviate traffic at these intersections. The intersection of Alakawa Street and Dillingham Boulevard is also a high traffic area throughout the entire day (due to Costco, Home Depot, and Best Buy) and details on how the traffic will be managed for the left-turning lanes and the support columns should be addressed.

Future Growth and Capacity: HCC has one of the only remaining large, vacant, and developable parcels in the Kalihi-Palama area. The Campus' long term plans for the former City and County of Honolulu incinerator lot are to construct a Science and Technology Building to accommodate growing state workforce needs in STEM related fields. In 2006 the Legislature appropriated planning money that has not yet been released by the Department of Budget and Finance. Until we begin construction, the lot is being used for parking. A project of this magnitude will need space for a baseyard during construction and, once construction is completed, rail maintenance. Our concern is that we may lose this lot.

Infrastructure and Buildings: It is unclear in the current proposal whether buildings, particularly the portables (Buildings 71A-D) at the corner of the Kokea and Dillingham, will have to be moved or demolished to accommodate construction of the Kapalama Station or the rail system itself. In addition, the simulation of Dillingham Boulevard on Page 4-76, Figure 4-28 shows the removal of power lines. It is assumed that as part of the construction of the elevated guideway, the power line will be placed underground along the new right-of-way for Dillingham Boulevard, but because of the current configuration of buildings and roads we are unsure how this portion of the project can be completed without major interruptions to campus operations.

Noise: Noise as a result of the trains so close to the campus will be an issue. At a rail transit presentation given to the HCC constituency in October 2008, it was stressed that the train will make less noise than a city bus. However, this is misleading because train noise won't be heard in a vacuum and will not replace bus noise; rather it will add to the current level of bus and traffic noise. Furthermore, it can be assumed that traffic volume of large vehicles, such as The Bus, will increase in frequency and volume due to the Kapalama Station and new business development along the train route. This will simply compound train noise.

Environment: There are True Kamani Trees located along the south side of Dillingham Boulevard. The DEIS shows that these trees will be removed. We strongly recommend that these historic trees be preserved and transplanted somewhere on the HCC Main campus.

If there are any questions, please contact me at 845-9187.

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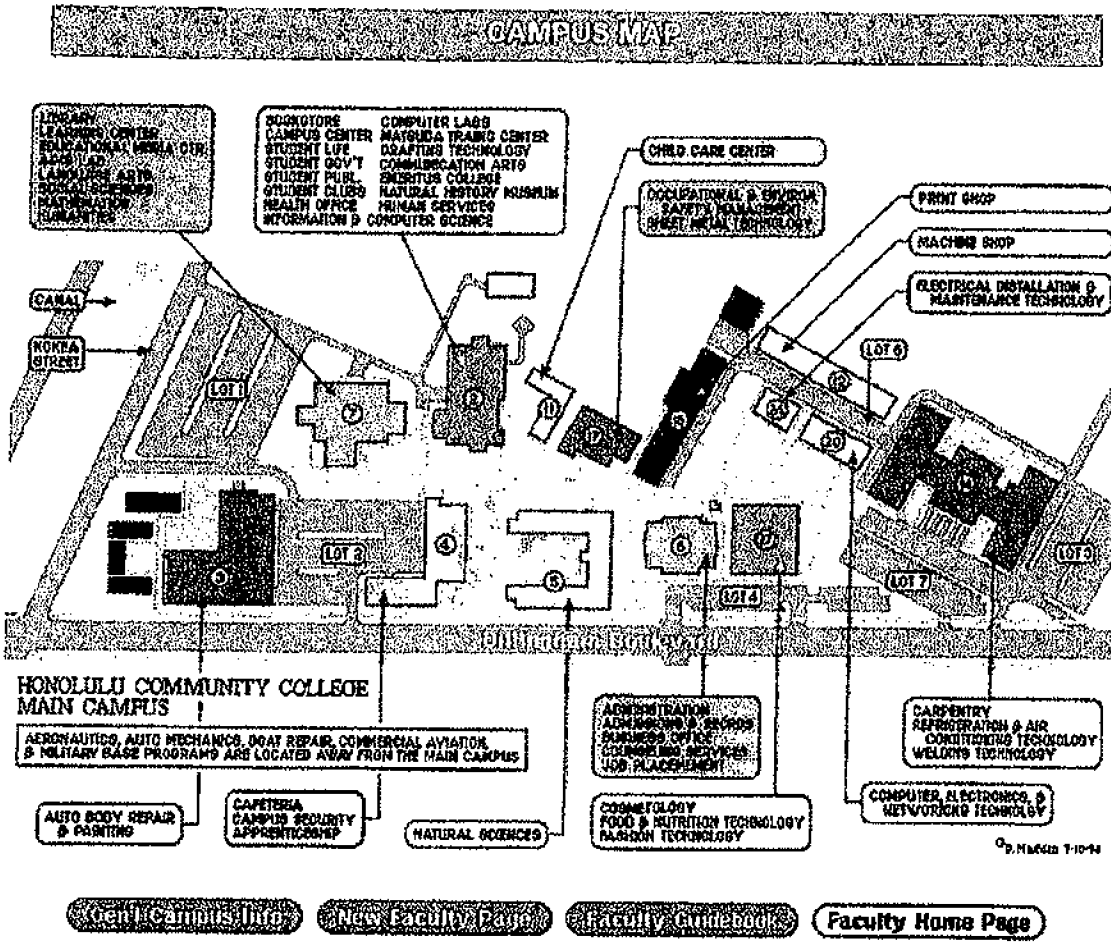

Gen'l Campus Info | New Faculty Page | Faculty Guidebook | Faculty Home Page

DATE: January 2, 2009

FROM: University of Hawaii at Manoa
Office of the Vice Chancellor

Response to:
Honolulu High-Capacity Transit Corridor Project
Draft Environmental Impact Statement
Section 4(f) Evaluation
Dated November 2008

Comments:
The following comments are supplied by the University of Hawaii at Manoa (UHM) administration. We believe that these comments not only represent the opinion of the UHM administration but that they also reflect much of the UHM campus community's opinions on the transit topic.

Overall the UHM administration is in favor of establishing a high-capacity transit system that would serve the needs of the UHM and other UH campuses as well as the larger Oahu community. We believe that if done properly, this system could provide needed travel options, help to alleviate the growing traffic congestion and encourage transit oriented community development while supporting future growth, new development opportunities and connectivity for university campuses. While there is general support and agreement for the concept of the high-capacity transit system, how the system is designed and integrated into the community and that it integrally support the university's needs, are of specific concern. Furthermore, this Draft EIS does not, specifically or in detail, address the Moi'ili'ili / UHM leg of the project, the comments herein will be particulary focused on that portion of the proposed transit system.

Meeting UHM's Primary Needs:
The University of Hawaii Manoa campus has an enrollment of **21,000 students and 6,000 faculty and staff**. UHM is largely a commuter campus. There is a noticeable difference to Honolulu's traffic when UH is not in session. The existing commuter condition puts street parking pressure on the surrounding neighborhoods and causes the campus to create more parking facilities. Having viable transportation options to the single occupant vehicle will help to alleviate the ongoing tension with the neighbors for parking and allow the limited campus space to be used in support of higher education programs rather than parking. In addition, a viable high-capacity transit system could support future growth at the university and not constrain that growth with the need to increase on-campus parking infrastructure. It is critically important for this transit system to serve inter-campus connectivity as major portions of the UH program expand to locations such as West Oahu and Kakaako. The core high-capacity line is important but to successfully serve the UH population's needs an effective feeder system of buses must be in place to support travel to and from the trains.

The Manoa campus is a center for athletic, artistic and academic events. Tens of thousands of people arrive for a single campus event. Traffic congestion is a deterrent for increased participation for these events. A properly integrated transit system should support greater community access and participation in these events.

It is of primary importance to the university that any transit system that interfaces with the campus provide a safe transportation mode for our students- in the stations and on the trains. Transit connections with the university should not compromise the safety and security of campus life and operations. The system should bring added economic value to the campus and surrounding community and it should not have detrimental visual or environmental impacts.

Meeting UHM's Secondary Needs:
A high-capacity transit system should enhance housing and transportation options for UH students, faculty, staff and the community. The transit line must not overwhelm or bifurcate the community but create economic vitality with improved livability and property values.

The Moi'ili'ili area is overdue for revitalization. The UHM administration is very interested in engaging Kamehameha Schools (KS), other property owners and the community, the City and County and other stakeholders to discuss the mutually beneficial opportunities for the redevelopment of the Moi'ili'ili area.

Kamehameha Schools has major property leases terminating in that area currently and over the next five years. UHM is considering new housing and commercial opportunities in the area, KS, and other property owners, are interested in improving the value of their holdings, the community wants safety, affordability, livability and it fears displacement. This impending redevelopment should not proceed in a piecemeal fashion. Any changes will effect the economy and character of the neighborhood. Issues of density, housing, commerce, zoning, infrastructure, and transportation will be fundamental considerations in the redevelopment of the area. In Table 2-3, *Committed Congestion Relief Projects* of the draft EIS, indicates that the University Avenue H-1 on and off ramps will be modified. These modifications, community planning and especially the introduction of the transit line must be considered holistically if the university/ Moi'ili'ili community will be integrated and invigorated and if this leg of the transit line is going to be useful and beneficial. It is critical that the City and County become engaged, in the immediate future, with UH, KS, the community and other stakeholders in planning the redevelopment of this community with the transit integration. If the City and County does not soon engage with these stakeholders, the redevelopment will proceed as needed and it will be much more difficult to include the transit line through the newly redeveloped community in the future.

Potential Visual Effects:
Included are images including a simulation and drawing of the University leg of the transit line. (Figures 1-3) These images do not show the further impact of the station. These images indicate that the design of the line is not integrated into the fabric of the community.

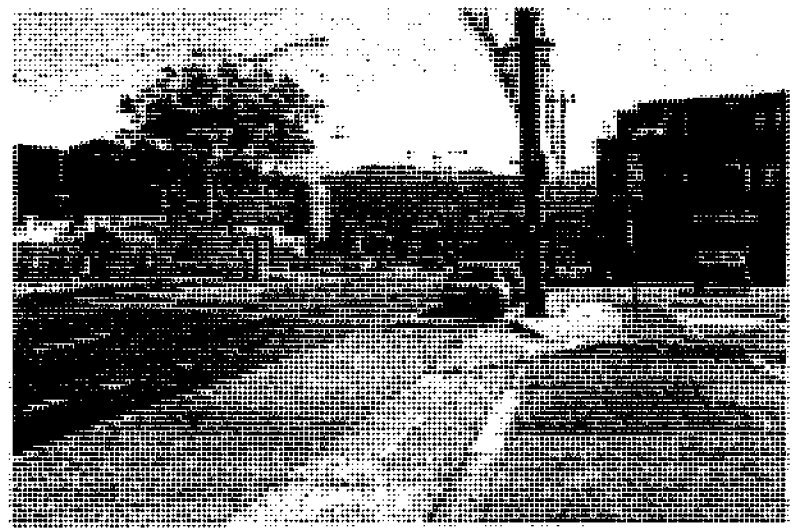

Figure 1- Existing Condition- University Ave and King Street – Looking Mauka up University Ave.

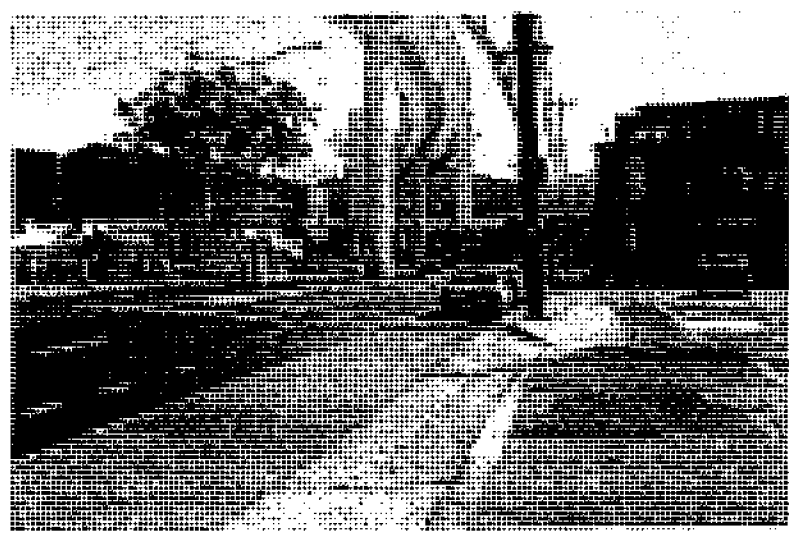

Figure 2- Transit Line Simulation- University Ave and King Street – Looking Mauka up University Ave.

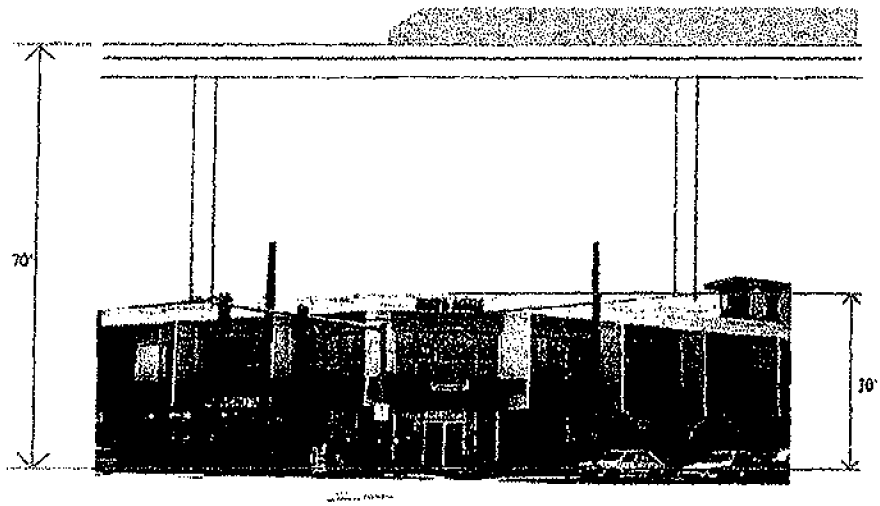

Figure 3- Elevation of Buildings with Transit line-
Corner of University Ave and King Street

In Section 4.18.2 Indirect Effects-, on page 4-170 *Neighborhoods*, there is a statement, *"... H-1 Freeway, have affected neighborhoods by cutting through and separating communities in the urban area and changing the character of communities. ... however effects as extensive as those caused by the construction of a new freeway would not occur"*. Although the transit line impacts along University Ave may not be as extensive as those caused by H-1 they are substantial, they have a high visual impact and they have, once again, the potential of negatively and irreversibly changing the character of the Moi'ili'ili community as H-1 once did. The H-1 overpass has also had a detrimental impact in bifurcating the university/ Moi'ili'ili community connection for the last forty years. This should not happen again. This is the time to look at the needs and aspirations of all parties, to once again make Moi'ili'ili whole and to comprehensively plan for the beneficial integration of transit into the Moi'ili'ili / UH community.

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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HONOLULU, HAWAII 96813
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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT2/09-299177R

Mr. Brian K. Minaai, Associate Vice President
Capital Improvements
University of Hawaii
Biomedical Sciences B-102
1960 East West Road
Honolulu, Hawaii 96822

Dear Mr. Minaai:

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

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

1. Vehicle Maintenance and Storage Facility. *A portion of a possible second access road will be built to provide access to the proposed maintenance and storage facility adjacent to Leeward Community College. A connection to the public street system makai of Waipahu High School would need to be completed by another entity and is not a component of the Project.*

Section 3.4.3 of the Final EIS describes the detailed traffic analysis that was conducted to determine the traffic effects of a maintenance and storage facility. The study found that 63 trips will be generated by vehicles using the facility during each a.m. and p.m. peak period. The traffic analysis concluded that these vehicle trips will not affect nearby intersections.

Addendum 02 to the Transportation Technical Report (RTD 2009i) provides further discussions regarding the traffic analysis conducted for the Project.

a) As stated in Section 4.8 of the Final EIS, there will be lighting associated with park-and-ride facilities, stations, the maintenance and storage facility, and trains, which include interior and safety lighting for the stations and interior lighting and headlights on the trains. For most of the alignment, light and glare associated with the guideway will generally be located in existing roadway rights-of-way, which currently produce transportation-related light and glare. Furthermore, the light intensity from trains is expected to be comparable to or less than existing buildings and vehicles along the alignment. Mitigation measures, such as shielding exterior lighting, will be included with the Project to minimize visual effects. In Section 4.8.3 of the Final EIS, specific environmental, architectural, and landscape design criteria are listed that will help minimize visual effects of the Project. This list includes exterior lighting standards. The Project will work with Leeward Community College (LCC) to minimize the undesirable effects of lighting on campus activities, including the observatory. As stated in Section 4.17.2 of the Final EIS, the design of the maintenance and storage facility will pursue Leadership in Energy and Environmental Design (LEED) Certification. This involves the incorporation of proven sustainable materials, methods, and technologies into its facility design to increase life-cycle value, including reduction of energy and resource use, and to enhance the health and comfort of employees and visitors. LEED is a performance-oriented system where credits are earned for satisfying criteria related to specific environmental impacts inherent in the design, construction, and operation, and maintenance of buildings.

b) The maintenance and storage facility will be fenced and secured, and will be staffed 24 hours a day.

c) All State and Local regulations for dust control and other air quality emission reduction controls will be followed. Where possible, if there are special requirements beyond emission controls during construction, the Project will work with LCC to identify sensitive receptors and minimize exposure.

2. LCC Transit Station

a. DTS will relocate and/or replace LCC buildings that are impacted by the Project.

b. The information regarding the portable building related to the University of Hawaii at West Oahu (UH West Oahu)'s Center for Labor, Education, and Research is noted. The Project will respond to questions received from UH West Oahu's administration.

c. Training facilities in the LCC parking area will be relocated, if necessary, for construction and operation of project facilities at that location.

d. Project staff has been coordinating with representatives from LCC regarding parking. A new permanent parking lot will be constructed in the lower campus area as requested, prior to construction of the station.

e. Project staff has been coordinating with representatives from LCC regarding the access road. A new permanent access road will be constructed that will connect to the lower campus area as requested, prior to construction of the station. Coordination with LCC and other affected members of the community will continue throughout construction of the Project.

f. DTS will work with LCC to determine if it is practicable to restrict hours of operation at the Leeward Community College Station to times when service is needed by the LCC community. It will not be possible to adjust hours of operation on a day-by-day basis.

g. As indicated in Section 3.4.2 of the Final EIS, access to stations will be enhanced to accommodate all appropriate modes, including bicyclists and pedestrians. The Leeward Community College Station entrance will connect to existing sidewalks or walkways wherever such opportunities are present. Project sidewalks and walkways will conform to Americans with Disabilities Act (ADA) requirements.

Honolulu Community College

Health and Safety — Stations will conform to applicable ADA and State requirements related to accessibility. DTS will work with State and City agencies to encourage the development of safe pedestrian and bicycle routes near stations.

Primary Campus Entrance and Parking — As noted in Section 3.4.4 of the Final EIS, stations with the highest estimated demand for spillover parking are at West Loch, Pearlridge, Iwilei, and Ala Moana Center. The Final EIS also notes that actual spillover parking at stations will be influenced by such factors as availability of parking, changing conditions that will affect actual access to stations, and future development in station areas. In Section 3.4.7 of the Final EIS, potential mitigation approaches are identified for parking effects, including spillover parking. As noted in that section, the approaches to mitigating effects of spillover parking will be unique to each station area. The City will conduct surveys to determine the extent of spillover parking demand near stations and implement one or more mitigation strategies as needed. The specific mitigation strategies and the schedule for implementation will be determined as the stations are opened.

Traffic — As shown in Table 3-21 in the Final EIS, additional right-of-way will be acquired along Dillingham Boulevard between Kaaahi to King Streets to provide space for columns in the median. The existing number of travel lanes (two in each direction) and left-turn lanes at intersections along Dillingham Boulevard, including Kokea, Kohou, and Alakawa Streets, will be retained.

Future Growth and Capacity — Dillingham Boulevard will require widening to the makai side. Additional right-of-way will be required to relocate the sidewalk farther makai and allow for the widening. This widening will not affect Honolulu Community College (HCC) on the mauka side of the street. A small portion of land at the mauka Koko Head corner of Kokea Street will be required for a station entrance. The City will work with HCC to minimize impacts to existing operations or access.

The decision regarding temporary construction yards is typically made by the construction contractor based on what works best for them. The contractor could approach HCC about the use of the available lot when that part of the Project begins construction. The Project has no plans to use that lot permanently.

Infrastructure and Buildings — In general, any operating facilities affected by the Project will be acquired or replaced. However, the Project does not plan to move or demolish Buildings 71A-D. The power lines may be placed below grade, but that has not been decided. To the extent possible, construction efforts will minimize the effect on adjacent homes, businesses, and other facilities, although there will be activity in the area that may have undesirable short-term effects. A Maintenance of Traffic Plan with detailed information about the Project's construction program and its immediate effects will be developed to provide assistance in negotiating the construction period.

Noise — As noted in Section 4.10 of the Final EIS, there are no noise impacts predicted for HCC. The number of buses on Dillingham Boulevard will decrease with the Project as more trips are made by train.

Environment — Street trees along the alignment are discussed in Section 4.15 of the Final EIS. Effects to street trees will be mitigated by transplanting existing trees or planting new ones, where possible. Other possible mitigation measures are discussed in Section 4.15.3 of the Final EIS.

Office of the Vice Chancellor

Meeting the University of Hawaii at Manoa's (UH Manoa's) Primary Needs — As indicated in Section 1.8 of the Final EIS, the purpose of the Project is to provide high-capacity rapid transit in the transportation corridor between Kapolei and UH Manoa. The Project described in Chapter 2 of the Final EIS will serve the corridor between East Kapolei and Ala Moana Center. Communities in East Honolulu will still benefit with the added bus service that will be provided to the Ala Moana Station. Future bus routes with the Project are shown in Appendix D of the Final EIS.

The Project is working with the Honolulu Police Department to develop a safety and security plan to minimize crime and vandalism on the guideway or at stations. Security will be provided in the form of surveillance cameras, lighting, fencing, barriers, on-site personnel, or other means.

Meeting UH Manoa's Secondary Needs — The comment about planning the area near the university holistically is noted. The Project has logical termini at East Kapolei and Ala Moana Center and independent utility from any extensions that may be constructed in the future. The future extensions to West Kapolei, Salt Lake Boulevard, Waikiki, and UH Manoa are discussed in the cumulative impacts sections of Chapters 3 and 4 of the Final EIS. However, the future extensions are not part of this Project; thus, they are not required to be evaluated under Chapter 343 of the Hawaii Revised Statutes and NEPA. Under NEPA, environmental analysis is only required when there is a proposed action by a Federal agency. For this Project, because the future extensions are not proposed for implementation at this time, they are not part of the

Project studied in the Final EIS. It would be premature to undertake an environmental analysis of the extensions (beyond the cumulative impacts analysis) because they are not part of the proposed action to be taken by the City and FTA. If the future extensions are proposed for implementation in the future, environmental analysis of the extensions and appropriate alternatives will be undertaken at that time.

The extension of the Project to the University is only noted as in Section 4.19 in the Cumulative and Indirect Effects of the Final EIS, but any planning for the Moiliili area should include the future guideway.

The present Project terminates at Ala Moana Center. The images referenced in the comment do not accurately represent the Project. No detailed engineering has been completed on the University extension, and no details have been developed from which to develop accurate simulations.

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

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

998706

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TRANSPORTATION SERVICES
CITY & COUNTY OF HONOLULU

February 4, 2009

MEMORANDUM

TO: Mr. Wayne Yioshioka
Director, Department of Transportation Services
City and County of Honolulu

FROM: Panos D. Prevedouros, Ph.D.
Professor

SUBJECT: Comments on Rail Transit Draft EIS

My review was based upon the DEIS section 4F dated November 2008 and particularly of chapter three on transportation impacts. However, most of my comments refer to the supplementary report "Transportation Technical Report, Honolulu High-Capacity Transit Corridor Project, Prepared for: City and County of Honolulu, 417 pp, August 15, 2008" which includes much more detailed analyses and explanations on the traffic and transportation analyses that were the foundation of the results presented in the DEIS. Italics and quotes refer to direct passages from the subject DEIS and accompanying documentation.

(1) Traffic Analysis Methodology
Level-of-Service: The Synchro 6.0 software suite (Synchro) was used for intersection analysis. Synchro applied the HCM Operational Analysis methodology and intersection input data to estimate control delay at each study intersection.

This traffic analysis method is not suitable for saturated conditions, and is not suitable for corridor and regional studies. HCM mentions these limitations. Almost all traffic elements along this corridor are oversaturated, thus HCM methodologies do not apply (unless the wrong data are used and degrees of saturation are low.) Either way the output is wrong or misleading.

(2) Peak Hour Screenline Level-of-Service Methodology
To measure and describe the local roadway network's operational status, an LOS grading system was developed to describe a facility's operation, ranging from LOS A (free-flow traffic conditions with little or no delay) to LOS F (over-saturated conditions where traffic flows exceed design capacity, resulting in long queues and delays). The operation of the roadway segments was calculated by comparing traffic volumes on roadway facilities to the saturated volume LOS thresholds for each individual facility. The LOS is reported for each individual screenline facility, then weighted by traffic volumes to report overall operating conditions across each screenline

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This is an ad hoc method that is not a national standard. It is entirely inappropriate to use the Highway Capacity Manual's LOS measure without using the HCM methodology. The HCM LOS for freeway screenlines is based on density and speed not on volume-to-capacity ratio. Furthermore, the volume to capacity "method" in the DEIS was applied wrongly in the Alternatives Analysis. The table on the top half of page 3, in which all black cells are the reviewer's corrections, shows that general purpose traffic was estimated to be 31% above capacity (estimate of 1.31) but by their numbers, the correct estimate is 62.5% over capacity (estimate of 1.625.) Capacities are not revealed everywhere in the DEIS, so the reviewer cannot check the same calculations in the DEIS.

(3) Forecasts

Neither the DBEDT (provider of some of the base forecasts), nor the City nor their consultants understand that most growth phenomena in a metropolitan area concerning city expansion and their traffic follow an S-curve depicted by many years of existence as a village, transitioning to a city, several years of growth into a metropolitan area followed by a very long period of maturity with small growth (and decrease) periods. This study erroneously assumes a large future growth for west Oahu and nightmare traffic scenarios whereas Oahu's population, development and tourist attraction have ended their sharp growth and have entered their mature level with a lot of negative bumps along the way. For example, DBEDT Data Book Table 1.06, Honolulu population in 2006 was 906,715 and it dropped to 905,601 in 2007 which was before the sharp economic downturn of late 2008 which is expected to last till 2011.

As shown in the figure on page 3, if S-shape forecasts were used, then the unrealistic demand levels shown in the Alternatives Analysis (AA) would never had appeared. However, something inexplicable happened between AA and DEIS: Screenline demands have been reduced by 28% without any explanation. As shown in the table on page 3, demands in the 2008 DEIS are lower by 28% for year 2030 compared to what they were in the 2006 Alternatives Analysis.

Such a discrepancy (28%) in demand produced by the OMPO forecasting model is highly suspect. Qualified alternatives such as TSM and Managed Lanes were dismissed based on high demand figures in the AA which were subsequently modified in the DEIS. A supplemental DEIS is needed to evaluate qualified alternatives with the reduced demand forecasts.

(4) Localized Traffic Analysis at and near Stations

...However, the nature of the system's operation is such that traffic could increase at localized levels, thereby requiring further analysis. These reasons include the following factors: [bullet list omitted]

While a number of good reasons are listed for induced and circulating traffic around stations (how were taxis accounted for?), the analysis is localized and the impacts of these trips on the whole are not assessed, therefore, the DEIS models produce underestimates of vehicular VMT, vehicle hours, pollution and regional congestion for the Rail scenario.

In general, this is a piecemeal analysis that is not appropriate for a project of this magnitude and with such pervasive construction and bus routing impacts.

AR00001221

AA Table 3-12	2030 Rail				
Kalauao Stream Koko Head bound	20-mile Alignment Kapolei to Ala Moana Center				
	Revised Facility Capacity	Forecast Volume (vph)	Volume/ Capacity Ratio-AA	LOS	Correct volume/ capacity estimates
H-1 Fwy	9,500	17,209	1.811	F	
H-1 Fwy (HOV)1	1,900	2,740	1.442	F	
H-1 Fwy (Zipper) 1	1,900	2,241	1.179	F	
Moanalua Rd	1,700	853	0.502	A	
Kamehameha Hwy	3,450	3,059	0.887	D	
Managed Lane					
Total General Purpose Traffic	14,650	21,121	1.310	F	1.625 24%
Total HOV Traffic	3,800	4,981	1.310	F	1.324 1%
		26102			

DEIS (from Technical Report Appendix C Table C-3)	2030 with First Project Salt Lake Option				
Kalauao Stream Koko Head bound	2030 Facility Capacity DEIS	Forecast Volume (vph)	Volume/ Capacity Ratio-2	LOS	Correct volume/ capacity estimates
H-1 Fwy	9,500	12,170	1.281	F	
H-1 Fwy (HOV)1	1,900	1,640	0.863	E	
H-1 Fwy (Zipper) 1	1,900	1,460	0.768	D	
Moanalua Rd	1,700	1,290	0.759	D	
Kamehameha Hwy	3,450	2,350	0.681	E	
Managed Lanes					
Total General Purpose Traffic	14,650	15,810	1.09		1.339
Total HOV Traffic	3,800	3,100	0.82		0.819
		18910			

errors

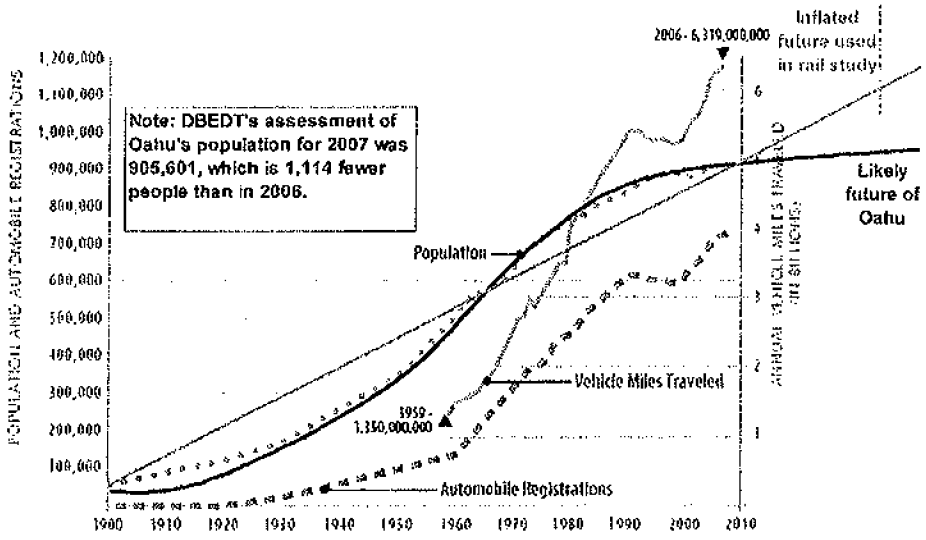

Figure 3-1: Historic Trends in Population, Vehicle Ownership, and Vehicle Miles Traveled for O'ahu

AR00001222

(5) DEIS Does not Assess the Impacts of the Project as Defined to the Public
As described in the Draft EIS, the Locally Preferred Alternative, called *the "Full Project," is an approximate 30-mile corridor from Kapolei to the University of Hawaii at Manoa with a connection to Waikiki. However, currently available funding sources are not sufficient to fund the Full Project. Therefore, the focus of the Draft EIS is on the "First Project," a fundable approximately 20-mile section between East Kapolei and Ala Moana Center. The First Project is identified as "the Project" for the purpose of the Draft EIS.*

This is a hugely critical simplification and it must be rectified with a Supplemental DEIS. The DEIS should have included both the full project and the 20 mile minimum operating segment or fundable project or whatever the City wishes to call it. The people's understanding is that the rail system is Kapolei to UH with service to Waikiki. The routes beyond the Ala Moana Center are necessary to be assessed in the DEIS. We do not ask the city to assess its mayor's obfuscations of future rail service from Hawaii Kai to Waianae, but the proposal always has been Kapolei to UH.

A Supplemental DEIS is required to assess the impacts for the whole corridor. It is not possible to begin the system, finish it to Ala Moana Center, and when it comes time to expand it, the expansion impacts are such that preclude any expansion.

(6) No Build Assessment of ORTP 2030 Congestion Relief Projects
Page 3-16: "*Even with $3 billion in roadway improvements under the No Build Alternative, traffic delay in 2030 would increase by 44%*".

If one was to correctly model all the committed congestion relief projects in ORTP 2030 (Table 2-3) and combine them with a the fact that Oahu population has been stagnant or falling (and bound to further fall due to poor economy and housing unaffordability), the highway congestion in 2030 could be improve by at least 15%.

For example, the PM zipper alone will carry about 1,500 vph through the Kalauao screenline with 3 or more people in them resulting in a person capacity of 4,500 going west. These are people removed from the existing network thus providing a substantial relief.

The westbound utilization of the rail will be optimistically 6,000 people through the Kalauao screenline of whom at most half will be drivers and ex-carpoolers or 3,000 people.

The PM zipper combined with a Nimitz flyover practically guarantee a continuous trip at 55 mph from Iwilei to Waikele to Kapolei. This commute is half as long in duration as that by rail.

Therefore, the PM zipper alone that carries more persons than rail can be more beneficial that rail. However, the DEIS tries to convince us that major traffic congestion relief projects will yield "peanuts" whereas the rail with its inferior speed and 15+ stops to Kapolei will yield superior travel time savings and traffic congestion improvements.

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Part of the reason is likely that planning models are insensitive to bottlenecks and only provide rough estimates based on some assumed values of capacity. Until this author sees proof of use of a regional microsimulation traffic model assessing the impacts without and with correctly modeled ORTP 2030 projects, he asserts that the analysis method was inappropriate and largely incapable in assessing the benefit of the projects in Table 2-3 of the DEIS.

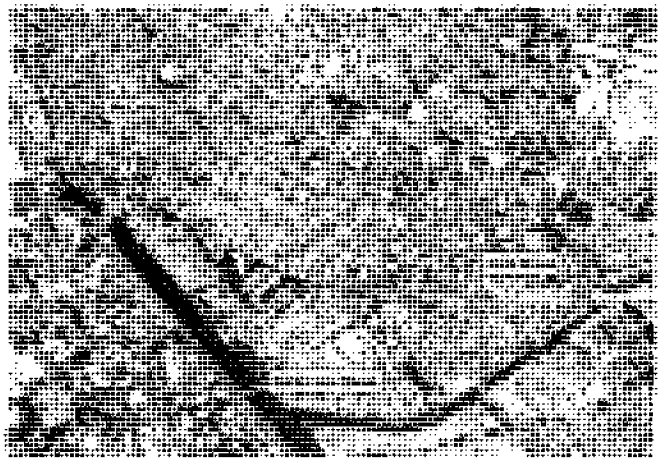
(7) TOD Potential Not Assessed

A final observation is that people may not realize the unintended consequences around some stations, particularly if they buy property in one of the city's Transit Oriented Development plans. For example, in the Pearl Highlands station, according to the DEIS estimates, over 1,700 vehicles in a day will come to park and take the rail, 300 vehicles will drop off passengers and over 300 buses will drop off and pick up over 8,000 transfer passengers. That's a lot of traffic, and that's station-only related traffic concentrate of the rush hours and this traffic will be on top of all the (heavy) regular traffic in the area.

The question then is... What's the impact of station generated traffic, noise and pollution to TOD potential and TOD plans? Where is the discussion and assessment?

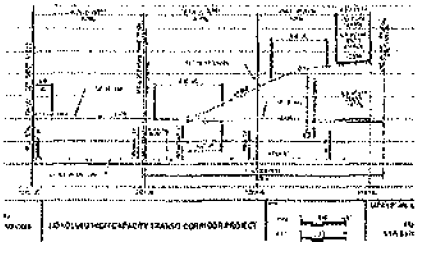
(8) Over the H-1 Freeway at University Avenue?

This author clearly recalls incumbent mayor Hanneman's beating of political opponent Ann Kobayashi for her complaining about the rail guideway going over the H-1 freeway on its way to the UH-Manoa campus. Both City and Hannemann vigorously and rudely disclaimed this in the September to November 2008 time frame but then the City presents this image on the official website as of February 4, 2009. the proposed rail clearly overflies the freeway!



(9) Two Stations at Ala Moana Center?

The Ala Moana Center station arrangement is a mystery. In the 20 mile plan, the station is approximately at the 3rd floor level. In the 30 mile plan the station is approximately at the 6th floor level. What is the exact plan for the Ala Moana Station and how can the guideway expand past the Ala Moana Center given the density, and height of buildings along Kona Street and Atkinson Drive?



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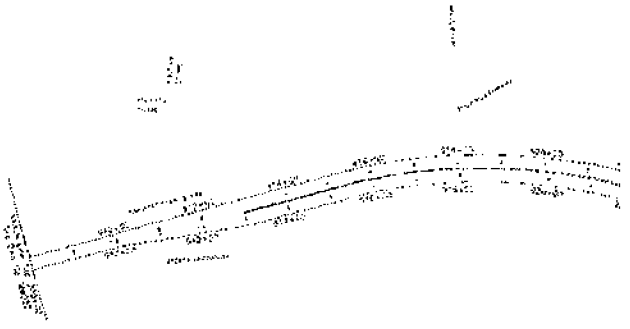
This author suspects that roughly half a billion dollars would need to be expended to reconfigure (that is, to demolish and reconstruct) the guideway alignment between Pensacola Street and Atkinson Drive, including the demolition of the 3rd floor station and the creation of a 6th floor station, if rail has any hope in reaching UH-Manoa or Waikiki via Kona Street.

(10) Why the Double Track by Aloha Stadium?
There is no explanation for this particularly wide double tracking by Aloha Stadium. What's the purpose, why has it not presented in detail and what is the cost of it?



(11) OMPO Never Rejected Pearl Harbor Tunnel as Claimed in Table 2-2
The DEIS is wrong in claiming that OMPO rejected the Pearl Harbor Tunnel. The UH Congestion Study found that this alternative has substantial traffic benefits at a cost comparable to rail's. There has been no substantiation to the tunnels alleged costs between seven and 11 billion dollars. Viable projects should not be excluded through unprofessional conduct.

(12) Federal Funding
The Project's cash flow analysis, which is presented in Section 6.4, anticipates the use of Local funds for the first construction phase and a combination of Local and Federal funds for the remaining phases.

The project must not start until the full extent of the federal funding is known in writing as part of the next Transportation Act of Congress, and the project should not start until a substantial portion of the federal funding (e.g., a portion that covers half of the cost of the first construction phase) has been actually released for the project. Anything else is simply reckless public policy.

(13) DEIS Base Travel Times Are Inaccurate.
Having resided in Kapolei for a short period if 2007, I know from personal experience that the morning peak period travel time from Kapolei to downtown is always under 75 minutes in the absence of rain or any lane closure. I was startled that the DEIS uses a time of 89 minutes.

I took the opportunity to ask people listening to a radio program that I participate to make some measurements of travel time from the H-1 freeway on-ramp to Alakea Street in downtown if they depart Kapolei between 6 AM and 7 AM. So far I received six qualified measurements of 49, 62, 75, 50, 62 and 59 minutes averaging at about 60 minutes. Therefore, roughly speaking the DEIS uses a 50% overestimate of the travel time which leads to false benefits of travel times by rail.

The DEIS fails to demonstrate the root causes of traffic congestion. The same travelers reported these airport-to-Alakea travel times: 18, 16, 41, 11, 30 and 25 minutes for an average of 23.5 minutes (DEIS uses 25 minutes). The real issue therefore is the traffic flow condition on Nimitz Hwy. which vary widely as these travel times show: 11, 16 or 18 minutes with good conditions,

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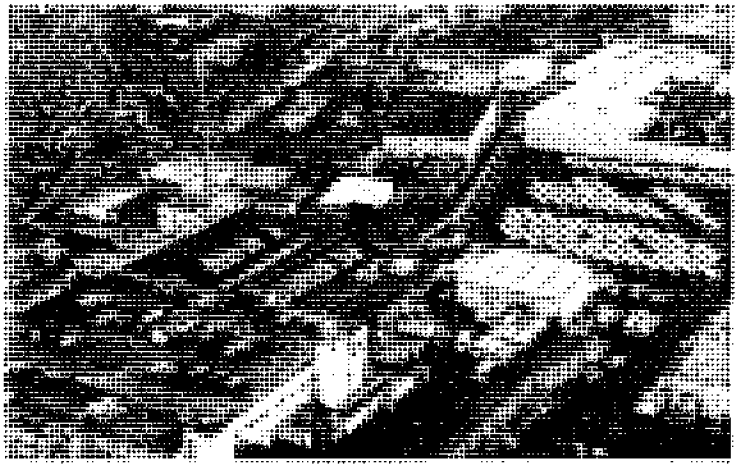
25, 30 or 41 minutes with poor conditions. This makes it clear that a roughly two mile long Nimitz Viaduct will provide a consistent travel time from airport-to-Alakea of about 6 minutes, reducing the peak hour trip from Kapolei to downtown from about 60 minutes to about 40 minutes. A relatively modest investment solves a huge part of the morning commute congestion.

Note that rail will be providing airport-to-Alakea transit travel time of about 50 minutes (It is 50 to 54 minutes depending on the route selected. The airport route provides the longest travel time for this origin-destination pair.)

(14) How Will the Rail Cars Go to the Rail Yard?
The rail yard is located several miles inland with no direct access to the harbors. Yet the DEIS is silent as to how rail cars and rail equipment will be transported there since rail cars do not fit on regular flatbed trucks and even if they can be accommodated by length and by weight on custom flatbeds, they do not fit by height due to the existence of several overpasses along the freeway. What are the logistics and costs of this significant part of the construction?

(15) Rail Travel Times for Political Commercials and for NEPA Documents—Why the Double Standard?
The DEIS clearly specifies that Kapolei-to-downtown travel time by rail is 50 to 54 minutes. This travel time estimate was clearly known in August 2008. Yet in September 2008 the City mailed all residents (using taxpayer funds) a large eight page brochure the centerfold of which states that Kapolei to Ala Moana Center by rail will be 40 minutes! (For those unfamiliar with the alignment, the Ala Moana Center is five stations after Downtown.)

(16) TheBus Inventory
In reference to Table 3-12: TheBus 2007 Vehicle Inventory: Why is this inventory taken from "National Transit Database, 2007" and not directly from TheBus or the City? Why is the total passenger capacity not listed?



At any given time, what percentage of these buses are service ready as opposed to in repairs or waiting for repairs or parts, or damaged and beyond repair awaiting replacement? It is my understanding that a lot of buses (about 20%) sit at depots during peak periods and express bus "crush loads" are artificial due to limited scheduling of capacity. A case in point is the picture shown above. It was taken at 6:30 AM on a normal weekday in 2004. The freeway is bumper-to-bumper in the town-bound direction, yet at least 53 buses sit at the depot, many of them articulated (which are typically

assigned to the express routes.) How can TheBus "burst at the seams" as a pro-rail commercial claimed in late 2008 when many of the buses sit empty at the depot?

(17) TheBoat as a Threat to the Rail
TheBoat vessel inventory in page 3-31 is wrong. It should also be mentioned that its schedule reliability is poor due to frequent mechanical failures and high seas.

Since we spend the significant amount of $6 million a year on TheBoat, why didn't the DEIS estimate the productivity and congestion reduction of this alternative transportation mode? Will TheBoat reduce rail's ridership?

(18) Unrealistic Fares
To maintain consistency with the travel demand analysis, the actual 2007 average fare of $0.77 per linked trip was assumed to grow with inflation throughout the forecast period.

So the DEIS assumed that fares are the same as TheBus, which given the cost to build and operate the rail, this means that trips are essentially free to users and the general public pays for it. How can this possibly be reconciled with the Council's desire to cover 30% out of the fare box?

What kind of administrator, engineer and planner does it take to build a five billion dollar transit service and then charge a dollar per ride? I must have this answered so we are able to teach our students this "new math."

(19) Ho'opili
The EIS for the Ho'opili project analysis for permit application was done by a consultant other than Parsons Brinkerhoff. It shows projected 2030 freeway traffic conditions with and without rail transit. There's no difference; both are level of service F. It is clear that rail or not, traffic conditions along the subject corridor will be terrible. So the City clearly violated the intent of the NEPA process to clearly inform Oahu's citizens that rail is no solution to traffic congestion. We all know that the City used taxpayer money to do the exact opposite.

(20) Forecasts from the OMPO model
There is a long list of limitations of the OMPO model used to develop the all-important rail forecasts. Here are a few:

20.1) The model was developed in 1994 by Parsons Brinkerhoff. It is very old in terms of boith architecture and data validity. It is also of interest that the same person who developed it as a Parsons Brinkerhoff forecaster now is an Federal Transit Agent who inspects the forecasts.

20.2) The model has parameters for dead attractions such as the Kodac Hula Show and the Dole Cannery, but has not parameters for Superferry, Ko Olina, Water Adventures Park, North Shore and Haleiwa.

20.3) The OMPO model is hardly a modern activity-based microsimulation platform. It is an old, aggregate platform with highly compartmentalized trip definitions such as

AR00001227

wh journey-to/from -work, home-based work
wo journey-to/from -work, home-based other
wn journey-to/from -work, non-based
ww journey-to/from-work, work-based
aw journey-at-work, work-based
an journey-at-work, non-based
nk not-work-related, home-based k-12 school
nc not-work-related, home-based college
ns not-work-related, home-based shop
no not-work-related, home-based other
nn not-work-related, non-home-based

It is also extremely cumbersome to use as use as this note tells all: *Each of the eleven trip purposes requires a separate application of program MC.* So just for the weekday morning travel one has to run the mode choice model 11 times to determine if rail will have any share of the passengers using coefficients that were "adjusted" from other cities. Given that TheBus share is high compared to other cities with bus systems, I suspect that the adjustments were very generous in favor of rail. The DEIS does not present or explain any of this.

20.4) The OMPO model depends on many assumed static capacities for various facilities. This makes it susceptible to range errors and easy manipulations. Note that the transit factor table depends on congested times. It would make sense that more people would choose transit from Kapolei to downtown if a time of 90 minutes is used instead of the correct time of 60 minutes. And that was done.

Same concern applies to arterial and freeway capacity which can be arbitrarily set too high or too low to satisfy the objective of the analysis such as "promote rail and undercut HOT lanes."

Transit Factor Table
To begin the travel demand process, an estimate of congested times is required.

Capacity Table
The format of the capacity table records is as follows:

...
7 27-31 Capacity for area type 5 (vehicles / lane / hour) F5.0
...
3 05 1000 1050 1050 1050 1100 1150 1200 1300
...
Note: The capacities on the table are vehicles per lane per hour.

Thank you for the opportunity to provide comments.

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City and County of Honolulu

AR00001229

CITY COUNCIL

CITY AND COUNTY OF HONOLULU
HONOLULU, HAWAII 96813-3065

Charles K. Djou
Councilmember, District IV
Chair, Intergovernmental Affairs Committee
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TRANSPORTATION SERVICES

December 4, 2008

Wayne Yoshioka, Director
Department of Transportation Services
City & County of Honolulu
650 S. King St., 3rd Floor
Honolulu, Hawaii 96813

RE: DEIS Comments on the Honolulu High Capacity Transit Corridor Project – (1) Proposed Project Phasing; and (2) Airport Alternative Route

Dear Director Yoshioka:

Thank you for allowing me to comment on the Honolulu High Capacity Transit Corridor Project for the Draft Environment Impact Statement (the "DEIS").

I respectfully submit that two changes should be made to the DEIS. First, the proposed construction phasing is not optimal. The first phase of the rail system should be from Aiea to Downtown rather than from East Kapolei to Waipahu. Second, the current Minimum Operating Segment (the "MOS") for the route should go through the airport and Pearl Harbor area rather than Salt Lake Boulevard.

1. **The First Phase of the Rail System Should Go from Aiea to Downtown**

The DEIS contemplates construction of the Honolulu rail system to be built in four phases, with each phase opening for operation upon completion of construction. (See DEIS, Fig. 2-44). The DEIS has the first phase and operating segment going from East Kapolei to Pearl Highlands, with a proposed complete opening sometime at the end of 2013. The second phase from Peal Highlands to Aloha Stadium is not slated to open to the public until the end of 2016. (See, DEIS, p. 2-20).

Instead of the proposed phasing contained in the DEIS, the first phase of the rail system should go from Aiea (the Aloha Stadium stop) to Downtown Honolulu (the Aloha Tower stop) rather than East Kapolei to Waipahu.

There will simply be insufficient ridership of any rail system to justify opening the initial segment of the rail from East Kapolei to Waipahu. Significantly higher ridership will be garnered for an Aiea to Downtown phase. Garnering a high initial ridership during the first phase of the rail system will provide a more direct benefit to the community and more immediate traffic relief. Such an initial Aiea to Downtown phase can build greater community support, initial enthusiasm and long-term ridership for a Honolulu rail system than a little used East Kapolei to Waipahu phase.

Furthermore, it may take over a decade to construct the entire MOS. There are numerous unknowns that could occur during the construction of the MOS, including a continued economic slowdown that jeopardizes funding or a natural disaster such as a hurricane that could jeopardize construction cost estimates. By construeting the first phase from Aiea to Downtown rather than East Kapolei to Waipahu, the City will insure that even if these contingencies occur, the public will still have a rail system that it can glean significant benefits from. If the City runs out of financial resources or a natural disaster occurs, and all the City is able to construct is an East Kapolei to Waipahu segment, the public will have expended enormous public resources for a rail segment that does not make much practical sense.

An initial maintenance facility can be constructed in the industrial area surrounding the airport for an Aiea to Downtown phase. This should not be a barrier to starting construction of the rail in-town rather than from the West.

In the alternative, if the City must start the construction in Leeward Oahu, the DEIS phasing should be altered to initiate construction at the proposed Waipahu maintenance facility and progress eastward. Such a construction schedule is far more sensible than starting in East Kapolei where there are currently no residents or jobs.

2. **Airport/Pearl Harbor Route Should be Selected**

The DEIS examined three possible route configurations, one following Salt Lake Boulevard, one that goes to the Airport and Pearl Harbor and a third that examined both. (See, DEIS, p. 2-19).

The Airport route should be the MOS. This route will yield higher ridership and is far more sensible given Honolulu's demographic conditions. Given Honolulu's main industry is tourism and its second largest industry is defense, connecting the Airport and the Pearl Harbor areas makes much more sense than pursuing the Salt Lake Boulevard alignment. Furthermore, this route was the Locally Preferred Alternative in 1992, the last time Honolulu embarked on the rapid transit project.

Again, thank you for allowing me to provide comments on the DEIS. Please do not hesitate to contact me if you have any further questions. Best wishes.

Aloha,

Charles K. Djou
Honolulu City Councilmember
District IV (Waikiki, East Honolulu

CKD:frf

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT12/08-290120R

The Honorable Lee Donohue
Honolulu City Council
530 South King Street, Room 202
Honolulu, Hawaii 96813

Dear Councilmember Donohue:

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

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

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

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

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

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

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

Your predecessor's preference for the Airport Alternative has been noted. While each of the alternatives includes trade-offs between benefits and impacts, the Airport Alternative from East Kapolei to Ala Moana has been selected as the Preferred Alternative. The identification of the Airport Alternative as the Preferred Alternative was made by the City to comply with the FTA's NEPA regulations that state the Final EIS should identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection is detailed in Section 2.4 of the Final EIS and was based on consideration of the benefits of each alternative, public input on the Draft EIS, and City Council Resolution 08-261 identifying the Airport Alternative as the Project. Further, FTA's NEPA regulations for projects proposed to be funded with major capital investment funds, the level of detail necessarily increases between the Draft EIS and the Final EIS through preliminary engineering work (23 CFR 771.123 (j)).

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

Very truly yours,

WAYNE Y. YOSHIOKA
Director

APPROVED:

Kirk W. Caldwell
Managing Director

Enclosure

CITY COUNCIL
CITY AND COUNTY OF HONOLULU
HONOLULU, HAWAII 96813-3065 / TELEPHONE 547-700(

January 14, 2009

Mr. Ted Matley
FTA Region IX
201 Mission Street, Suite 1650
San Francisco, CA 94105

Subject: Honolulu High-Capacity Transit Corridor Project

Dear Mr. Matley:

I would like to take this time to thank you and the Federal Transit Administration (FTA) on behalf of the citizens of the City and County of Honolulu for your expertise and diligent oversight of the Honolulu High-Capacity Corridor Project (Rail Project). Your oversight of the development of our Rail Project will assure our citizens that they will be rewarded with a rapid transit system that is fiscally sound, and will meet the needs of the communities now...and in the future...without undue burden given the current economic times, and risks associated with the development of systems of this complexity.

I would also like to convey to you my complete support for a rapid transit system for the City and County of Honolulu that will meet the needs of our citizens...being affordable, beneficial and with less financial risk associated with its development, construction and continued operations and maintenance.

In regards to my support, I have been intimately involved in the Rail Project since its inception with a keen interest in making sure that we follow through with meeting the aforementioned needs (tenets) of our citizens...again, being affordable, beneficial and with mitigated financial risk.

In my review of the Draft Environmental Statement (DEIS), I have several concerns in our ability to meet these tenets and the resulting financial burden that will be placed on our taxpayers. I have voiced my concerns through various means including several editorials (see attachments A, B and C) for your review. And through this letter, I would like to personally bring these concerns to your attention in your oversight capacity. In the end, my concerns can be summarized as fiscal in assuring that the citizens are not burdened with an unaffordable rapid transit system. These concerns are as follows:

1. General Excise Tax (GET) levels are down and would be expected to decline further due to the current economic situation we are experiencing on a global basis. In particular:

- GET collection over the first 20 months was $246 million. If averaged over 15 years…the total would be about $2.2 billion, which falls short of the overly-optimistic $4.1 billion in GET surcharge revenues estimated for in the Draft Environmental Impact Statement (DEIS)
- According to the Presidents Budget for FY2007, stated in the Annual Report of New Starts Proposed Allocation of Funds for Fiscal Year 2007, there are 21 other transportation projects ahead of Honolulu's Rail Transit Project that have applied for Full Funding Grant Agreements (FFGA).

A failure in adequate funding would leave a heavy financial burden on the citizens of the City and County of Honolulu which would only result in additional taxes either through extensions and/or increases in the GET; increase in property taxes; and additional costs incurred through the issuance of bonds to fund the development of the Rail Project.

2. The proposed change from the Salt Lake Boulevard alignment to the Airport alignment appears unjustified and impractical in terms of benefit and costs. For instance:

   - Costs for the airport alignment are reported to add $220 million more to the total price of the Rail Project, with an additional $75 million to double-deck the platform and guideway at the Lagoon Drive Station. This is above the much more practical and affordable Salt Lake Boulevard route.
   - The 20-mile long Minimum Operable Segment (MOS) from East Kapolei to Ala Moana Center via Salt Lake Boulevard was approved by the Honolulu City Council in February 2007. Two days after the rail ballot initiative was approved in the November 2008 General Election, a move to switch the route from Salt Lake Boulevard to the airport was proposed, leaving a bitter taste in the mouths of those who voted for rail believing the line would run through Salt Lake Boulevard.
   - The proposed airport rail station appears to be too far from the passenger terminal, making it difficult, if not impractical, for visitors to use—especially with no connection into Waikiki.
   - The costs for operation and maintenance of the airport alignment over the Salt Lake Boulevard alignment would be higher and pose an additional burden to the taxpayers, especially if the first segment is built from East Kapolei to Waipahu.

The change to the Airport alignment from the Salt Lake Boulevard alignment for the near-term does not appear to be fiscally prudent, nor does it provide the benefit to the community and citizens.

3. The Draft EIS lists the airport alignment's daily ridership as 95,310, compared to a ridership of 87,570 by 2030 for Salt Lake Boulevard. The Salt Lake community questions this disparity, particularly since the DEIS does not explain how these numbers were determined.

I am submitting a copy of testimony from Ron Tober, chair of the technology selection panel *(see attachment D)*, in response to a series of questions during a recent committee meeting. Based on his comments and expertise, the Salt Lake community and myself further

AR00001237

researched both the airport and Salt Lake Boulevard alignments. Here are several of our findings that question the validity of the airport alignment's 95,310 ridership count:

- Independent research conducted by a member of the Salt Lake Neighborhood Board shows several apparent inconsistencies in the Draft EIS. *(see attachment E)*
- There are about 7 million annual visitors to Hawaii. Seventy-one percent of those passengers go through the Honolulu International Airport, with the remaining 29 percent going to the neighboring islands.
- Asian visitors total approximately 2 million per annum, with the majority being Japanese. They arrive early in the morning and take buses to the hotels as part of the tour package. Check-in times are usually mid- to late-afternoons.
- Of the 21 major cities that launched rail systems since the 1970's, only 7 were connected to the airport *(see attachment F)*. Most of the links to airports were built after the rail systems were launched. This is why the airport spur should be built later or concurrently with a spur into Waikiki.
- There are approximately 12,500 civilian employees with free base parking at Hickam and Pearl Harbor combined. Most military personnel either live on, or near, the bases…with very short commute times to their workplace.
- About 727 state and 15,000 private sector employees are at the airport. There are over 7,000 parking stalls at the airport, including the new 1,800 stall parking structure for employees and locals to use.
- Oahu has a population of approximately 900,000 residents, of which 60,000 – 70,000 residents currently live along a 4-mile stretch of Salt Lake Boulevard. These residents represent a solid ridership base and can generate more revenues and therefore less taxpayer subsidy for operation and maintenance costs.
- In comparison, when the Minimum Operable Segment (MOS) is completed and operational by 2018, the airport route's daily ridership estimate of 95,310 and transit-oriented development (TOD) opportunities will not be fully realized until 2030, as projected in the DEIS.
- The Salt Lake Boulevard alignment, with two proposed passenger stations, compared to four for the airport route, meets the Cost Effectiveness Index (CEI). A third station in Mapunapuna, with a 150 acres and one owner, would further increase Salt Lake Boulevard's CEI and ridership level *(see attachment G)*.

In comparison, San Francisco International Airport (SFO) has over 34,000 workers, 6 million residents in Bay Area alone and approximately 16 million annual visitors, yet SFO has had difficulty in reaching projected daily ridership of 17,800 on the BART airport extension. Ridership levels are nowhere near what BART officials had hoped and the route is losing money.

The above concerns strictly address the need for fiscal accountability, especially in light of the current economic times we are experiencing…globally, and the impact that this will have on Hawaii's taxpayers. It is important that we take care of our citizens first in providing them the most affordable and beneficial rail transit system.

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In view of the aforementioned statements and on behalf of the citizens of the City & County of Honolulu, I request that the FTA, given its oversight and responsibilities in the development of this rapid transit system, conduct a separate ridership analysis independent of the current ridership analysis to validate whether the Airport alignment or the Salt Lake Boulevard alignment should be preferred. Further, the community firmly believes that beginning the project in East Kapolei does not make sense since it will do little to relieve traffic gridlock. To ensure greater ridership and reduce traffic, the first segment should instead begin in Downtown and proceed towards Kapolei. Therefore, this analysis should also address the stationing and proposed sequencing of the work.

I would also request that the FTA look at the delivery approach proposed in segmenting the work, and consider the use of a "Master Contractor" with the experience and capability to undertake the responsibility in accepting in large part the risk associated with the integration of the rapid transit system components. And not allow the City and County of Honolulu and our taxpayers to deal with this risk.

On behalf of taxpayers who will be paying for this project, as well as the many others in the community who voted in favor of rail in the November 2008 election believing that it would pass along Salt Lake Boulevard, thank you for your consideration of the above requests. I look forward to your favorable response to these requests so that our taxpayers can be assured that this project is proceeding in a fiscally-prudent and cost-effective manner.

Please give this matter your immediate attention since it appears a resolution to change the alignment from Salt Lake Boulevard to the airport is pending before the City Council, which will make a final decision on January 28, 2009.

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OFFICE OF TRANSPORTATION SERVICES
CITY & COUNTY OF HONOLULU

Sincerely,

Romy M. Cachola
Councilmember
District VII

cc: Wayne Yoshioka, Department of Transportation, City and County of Honolulu
Leslie Rogers, Regions Administrator, Region IX, Federal Transit Administration

attachments

AR00001239

Another View

Salt Lake a better choice than airport for rail route

By Romy M. Cachola

POSTED: 01:30 a.m. HST, Nov 26, 2008

Both Honolulu dailies endorse the airport route for the 20-mile minimum operable segment of the rail project. It is i everyone's best interest to carefully consider the following facts before stepping up to support the route.

» Construction cost. The airport route costs $220 million more than the Salt Lake Boulevard (SLB) route. We need to avoid the mistakes of other cities and analyze whether funding estimates are what taxpayers can afford. For example, extending Denver's FasTracks, which was estimated in 2002 to cost $4.7 billion, now costs $7.9 billion. Denver officials are contemplating raising their sales tax to fund this increase.

» Ridership levels. The Draft Environmental Impact Statement lists 95,310 daily passengers on the train by the year 2030. This means that when the rail line is completed by 2018, ridership and transit-oriented development potential for the airport won't be reached for 12 more years. In comparison, you don't have to wait until 2030 with the SLB route, which would go through the densely populated community of Salt Lake, where there would be a solid ridership from day one.

The estimate of 95,310 daily passengers on the airport route is questionable. There are about 12,500 civilian employees with free parking at Hickam and Pearl Harbor and about 727 state and 15,000 private sector employees a the airport, and more than 7,000 parking stalls at the airport, including the new 1,800-stall parking structure.

These are all disincentives for employees at the airport, Hickam and Pearl Harbor to ride rail.

In comparison, San Francisco International Airport has more than 34,000 workers and higher visitor arrivals than Honolulu, yet SFO has had difficulty reaching a daily projected ridership of only 17,800 on a BART extension. Since the extension opened in 2003, ridership is nowhere near what BART officials had hoped and the route is losing money.

» Operation and maintenance costs. Currently, taxpayers subsidize the TheBus at $130 million per year. With rail, the O&M cost for both is estimated at more than $200 million.

When the initial rail segment is built from East Kapolei to Waipahu, who will ride it? This first segment might not relieve traffic since gridlock begins where H-1 and H-2 merge. As you extend the first segment, it will still be "a train to nowhere." With less ridership and farebox revenues, taxpayers will pay more for O&M, which will continu to increase until it reaches downtown.

The above arguments are good reasons to build the first segment from downtown to East Kapolei via SLB; delay th airport route and give the state/city ample time to plan and build a station closer to the passenger terminal; and construct a Waikiki spur.

The advantages of adding a SLB station in Mapunapuna are: 1. the landowner is willing to donate land and help wi

station construction costs, and 2. there are better opportunities for affordable housing and transit-oriented development.

The debate between Salt Lake Boulevard and the airport should not pit one community against the rest of the island. This is not a popularity contest but a serious pocketbook issue with billions of dollars at stake.

Other than encouraging commuters to leave their cars at home, a successful rail project shouldn't bankrupt taxpayers' pocketbooks. Simply put, the Salt Lake Boulevard route is cheaper and better than the airport.

Romy M. Cachola represents District 7 (including Mapunapuna, Airport, Hickam, Pearl Harbor, Salt Lake and Foster Village) on the Honolulu City Council.

Find this article at:
http://www.starbulletin.com/editorials/20081126_Salt_Lake_a_better_choice_than_airport_for_rail_route.html

☐ Check the box to include the list of links referenced in the article.

Attachment B

OPEN FORUM

Salt Lake Route Saves Taxpayers' Money

By Romy M. Cachola

Immediately following the General Election, the Council proposed to change the route of the Honolulu Rail Transit Project from Salt Lake Boulevard to the airport. The proposal surprised many voters who felt that the change was improper.

The media hinted at a political compromise in the selection of Salt Lake Boulevard for the 20-mile Minimum Operable Segment (MOS) of the rail project. The truth is, for the rail project, leaders in the Salt Lake community and I have not played political games. Instead, we have worked very hard to justify why Salt Lake Boulevard is the better route for the Honolulu Rail Transit Project.

Here are our findings:

Airport

- The rail station is too far away from the passenger terminal, making it a hassle to lug around suitcases. There is also little incentive for visitors to use rail since there is no connection into Waikiki.
- There are over 7 million annual visitors to Hawaii. 71 percent of passenger seats go through Honolulu International Airport, with the remaining 29 percent going to the neighbor islands.
- Asian visitors, the majority of whom are Japanese, total approximately 2 million. They arrive early in the morning and are taken via buses to briefings or tours before checking in at their hotels in the afternoon.
- Out of 21 major U.S. cities that launched rail systems since the 1970s, only 7 were connected to the airport. Most of the airport spurs were built after the rail systems were launched.

Pearl Harbor/Hickam

- There are approximately 27,000 civilian employees combined at the airport, Pearl Harbor and Hickam with free parking on base.
- Most military personnel live on base or within a short driving distance.

Transit Oriented Development (TOD)/Housing

- The SLB alignment extends through Mapunapuna which encompasses 150 acres and is owned by a single landowner who is willing to donate

(continued on page 6)

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OPEN FORUM (CONT.)

from page 3, Salt Lake...)

land and help build a station. Adding a station in Mapunapuna would increase ridership for the SLB alignment and provide greater opportunities for affordable housing and TOD, particularly at:

1. Stadium Mall
2. K-Mart across Stadium Mall
3. Former Costco site
4. Salt Lake Shopping Center
5. Mapunapuna

Operation/Maintenance (O&M) & Construction Costs

- The SLB route is shorter and costs less than the airport route.
- When completed, the initial segment from East Kapolei to Waipahu, will have less ridership and won't relieve traffic gridlock. O&M costs and taxpayer subsidies will be more and will increase until the 20-mile MOS is completed. This will further burden taxpayers' pocketbooks.

Furthermore, we should look at the transit experiences of other cities and hopefully learn from their mistakes.

1. San Francisco's BART was extended to the airport in 2003 with a projected ridership of 17,800. Currently, they are hard pressed to meet projections, despite having 34,000 airport workers and higher visitor arrivals than Honolulu.

2. New York's Metropolitan Transportation Authority has proposed a 23 percent fare hike for the Long Island Rail Road and a 43 percent hike for Long Island Bus fares—a proposal which has angered passengers.

3. Denver's FasTracks transit extension, estimated in 2002 to cost $4.7 billion, now costs $7.9 billion. Officials may raise their sales tax to fund this increase.

Based on the above, we should be skeptical of the projected 95,310 riders for the airport route and the estimated $220 million that will be added to the cost of construction. If the numbers provided in the Draft Environmental Impact Statement don't match, taxpayers will be faced with the following additional funding proposals:

- Extend the half percent GET collection beyond the Year 2022.
- Increase the GET to one percent.
- Borrow money by floating bonds.
- Increase property taxes.
- Raise fares.

We should think first and foremost of the welfare of our taxpayers and select the route that is less costly and that will attract locals who will ride the rail despite a bad economy.

Leaders and residents of Salt Lake, although upset with the proposed route change immediately after the election and the deletion of $30 million for SLB widening, have done an outstanding job in defending Salt Lake Boulevard as the better route.

Joseph M. Zobian, M.D.

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AR00001243

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Attachment C

December 16, 2008

Reduce rail burden on O'ahu's taxpayers

By Romy M. Cachola

A recent article in The Honolulu Advertiser reported that general excise tax collections are down compared with last year's totals because of the bad economy and declining visitor arrivals.

Funding for the city's 20-mile minimum operable segment of rail has always been a major concern for me.

The half-percent GET collection for rail for the first 20 months was $246 million. If averaged out over the 15 years of collection, the total GET would be about $2.2 billion, which falls short of the overly optimistic $4.1 billion in GET surcharge revenues estimated in the draft environmental impact statement.

The following are other reasons for concern:

- With GET levels down, there may not be enough funds collected to build the eight-mile first segment from East Kapolei to Waipahu, which I suspect may cost around $1 billion.

- The airport alignment, if selected instead of Salt Lake Boulevard, would add $220 million more to the total price tag, plus an additional $75 million to double-deck the platform and guideway at the Lagoon Drive station, according to the draft EIS.

- According to the president's budget for fiscal year 2007, as stated in the Annual Report on New Starts Proposed Allocation of Funds for Fiscal Year 2007, there are 21 other transportation projects ahead of Honolulu's rail project that have applied for full funding grant agreements.

I stated early on that we can expect one or more of the following proposals if our construction cost estimates are off:

- Extend the half-percent GET collection beyond 2022, the final year of tax collection.

- Increase the GET to 1 percent.

- Borrow money by floating bonds.

- Increase property taxes.

It seems that the administration's plan to fast-track the first segment of the project using collected GET funds is coupled with the notion that once construction begins there will be no stopping. This may explain why the administration is hinting at floating bonds sooner rather than later to make up for the shortage. If we are forced to borrow money, as I suspect we will be, the debt service will be an added strain on taxpayers.

Instead, I strongly suggest, if at all possible, that the city fast-track its application to secure a FFGA with the Federal Transit Administration before starting construction.

The benefits of an FFGA are that it:

- Defines the project scope.

- Establishes a firm date for project completion.
- Provides a mechanism for designating funds for future years.
- Leads to the development of accurate cost estimates.
- Permits the use of state and local funding for early project activities without jeopardizing future federal funding for those activities.

An FFGA will result in better predictability and transparency and hopefully prevent cost overruns and delays of the project. Also, an FFGA will give our taxpayers peace of mind and comfort in knowing that they won't be saddled with the burden of repaying long-term debt through borrowing. We would further save taxpayers' money if the more affordable Salt Lake Boulevard alignment, which has a solid ridership base, is selected.

The City Council and administration need to keep taxpayers' best interests in mind for this multi-billion-dollar project. A successful project is one that will not only encourage commuters to leave their cars at home but also won't bankrupt our taxpayers' pocketbooks.

Romy M. Cachola is the councilman for Council District VII (Salt Lake, Halawa, Mapunapuna). He wrote this commentary for The Advertiser.

Transportation Committee
2.28.08
9 am

Presentation on the Evaluation and Selection Report by the Fixed Guideway Technology & Evaluation Panel.

Councilmember Todd Apo: You mentioned a potential problem with Dillinghan and the existing powerlines.

Ron Tober: That's correct.

Apo: So it's integrating an elevated system with existing powerlines?

Tober: I think it can be dealt with. It'll be a challenge for the engineers to come up with a way to do that.

Apo: So has nothing to do with the actual system. It's just a matter of what's there already and how to deal with it?

Tober: Correct.

Apo: the Salt Lake vs. airport route—I've been an advocate to get it back to the airport and Pearl Harbor. One way is to run lines through both of them. The other thing I've thrown out before is to run a line through one side and take a spur to the other side. Given what you've seen from the commercial (airport) and residential (Salt Lake) standpoints, if we look at doing it with a single line and a spur, any opnion on which one would make the most sense?

Tober: Meaning which direction the spur should come from?

Apo: I'm asking whether we should run a line through Salt Lake and take a spur through Pearl Harbor and the airport, or run the line through Pearl Harbor and the airport and take a spur through Salt Lake?

Tober: I think the day-to-day traffic, the potential that you have on Salt Lake, is greater. The airport has times of the day when you have lots of people coming in and when you have some dead periods of time at the airport. That's from my own personal experience. I came in yesterday afternoon at 5 pm and took a 5 pm bus from the airport to the hotel. Very little traffic going on at that point in time. So the daily ridership potential on Salt Lake is probably greater than at the airport. That's based in part on my own experience in running rail transit, which we did in Cleveland. So the spur probably is better taken to the airport. For when you have planes coming in and tourists and workers out there. Probably it's better coming off of the Waikiki-Downtown-Honolulu end of things, rather than the Kapolei end of things.

Apo: Let me throw out a factor that you're not aware of.—the employment factor. If it was just the airport, I'd tend to agree with you pretty easily. But when you throw in the employment factor for Pearl Harbor, which is a major employer in that area, as well as the industrial area around the airport. We'd probably need to show you the numbers. You can do the evaluation. The significant daily peak traffic worker transportation that's needed through there. Would that affect your analysis?

Tober: It probably would. I haven't had many real expereinces with Pearl and looking at that area. That very well could be a major factor in terms of where the greatest all-day ridership potential might be. That's something that I'm not aware of right now.

(1:52)

* * *

Attachment E

COMMENTS OF MARK TAYLOR ON DRAFT ENVIRONMENTAL IMPACT STATEMENT FOR HONOLULU RAIL TRANSIT PROJECT

December 9, 2008

Thank you for the opportunity to submit comments on the Draft EIS for the Honolulu Rail Transit Project. My name is Mark Taylor. I reside in the Salt Lake neighborhood of Honolulu and served from 1993 to 2007 as an elected member of the Aliamanu-Salt Lake-Foster Village Neighborhood Board.

I have three comments on the Draft EIS.

First, the opening paragraph of section 6.4.2 of the Draft EIS (entitled "Project Cash Flow") states that both the "Salt Lake and Airport Alternatives would be financially feasible." Yet this same paragraph states that the Airport Alternative would require $1.4 billion in Federal funding, and that the FTA "has not been approached to consider the $1.4 billion for the Airport Alternative."

Given that there is no indication that Federal funding at the $1.4 billion level will even be considered by the FTA, how can the Draft EIS state conclusively that the Airport Alternative is "financially feasible"? Unless and until the FTA indicates in writing that it is willing to consider providing $1.4 billion, the EIS should state that the Airport Alternative has not been shown to be financially feasible. To do otherwise is misleading and invites a fiscally imprudent policy decision on the initial transit alignment.

Second, Table 7-2 of the Draft EIS (entitled "Effectiveness of Alternatives in Improving Corridor Mobility") contains figures that appear questionable, if not incorrect.

- The table indicates that Transit Ridership in 2030 will be only 1% higher for the Airport Alternative than for the Salt Lake Alternative. Yet, it also indicates that Transit User Benefits will be 5% higher for the Airport Alternative than for the Salt Lake Alternative. This significant inconsistency should be either corrected or fully explained.

- The Airport Alternative's purported 5% advantage in Transit User Benefits equates to reduced travel time for all transit users of 800,000 hours per year compared to the Salt Lake Alternative. Yet, the Draft EIS indicates the Airport rail route actually takes longer to traverse than the Salt Lake rail route. In fact, assuming half of projected daily rail trips in 2030 include the portion of the system between Aloha Stadium and Middle Street, the Airport Alternative will increase travel time for rail users by over 500,000 hours per year[1]. How can the Airport Alternative *decrease* travel time for *all* transit users by 800,000 hours per year when it *increases* travel time for *rail* transit users by 500,000 hours per year? Again, this significant inconsistency should be either corrected or fully explained.

Third, Table 7-7 of the Draft EIS (entitled "Cost-effectiveness of the Build Alternatives") indicates the Salt Lake Alternative is more cost-effective than the Airport Alternative, but only by a small margin. The figures in this table are derived by dividing the cost of the system under each build alternative by the number of hours of Transit User Benefits it produces. Therefore, if in fact there are any revisions to the Transit User Benefits in Table 7-2 in light of the discrepancies identified above, Table 7-7 should also be revised to reflect the impact on the relative cost-effectiveness of each build alternative.

Thank you again for the opportunity to comment.

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[1] 90,000 projected daily trips multiplied by ½, multiplied by 2 minutes longer per trip, multiplied by 365 days per year, divided by 60 minutes per hour, equals 547,500 hours.

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CITY CLERK
HONOLULU, HAWAII

December 7, 2006

Council Chair Dela Cruz and Councilmembers,

My name is Mark Taylor and I'm a seven-tenth member and past chair of the Aliamanu/Salt Lake/Foster Village Neighborhood Board. I grew up in the Salt Lake area, graduated from Moanalua High School and have owned a home in Salt Lake for the past twelve years.

As you've already heard in prior testimony, our Neighborhood Board has voted unanimously in favor of building a Honolulu rail transit system with an alignment that includes Salt Lake Boulevard. I'm here today to help explain why.

The purpose of rail transit is to move people. According to the City and County of Honolulu's online GIS system, there are about 50,000 people residing within a mile and a half of the Salt Lake transit station location proposed in the City Administration's Alternatives Analysis. In the Board's view, it would make no sense to construct a rail transit system that bypasses such a large concentration of potential riders (and Council constituents).

The major perceived drawback of a Salt Lake Boulevard alignment is that it would bypass Honolulu International Airport. However, this is less of a problem than it may appear, for a simple reason: air travelers carry luggage, and therefore are unlikely to use rail transit to go to and from the airport.

Other cities have realized this. In selecting a transit alignment, the Council should be aware that most transit systems built in the U.S. in the past 35 years DO NOT service the local airport. Of the 21 major mass transit and light rail systems launched in U.S. cities since 1970, only 7 connect directly to the airport (see attached table). And for the 7 that do have airport connections, in all cases the airport was not served when the system opened. On average, the airport connection was established 7 years after the system began operation.

In a couple of instances, Los Angeles and San Jose, the transit line runs fairly close to the airport, and there's a shuttle bus service between the closest transit station and the airport terminal. Such a solution could be adopted in Honolulu if the Council were to opt for a Salt Lake Boulevard transit alignment.

In conclusion, I urge the Council to make rail transit available to local taxpayers living in Salt Lake who have to commute back and forth to work every day, rather than to tourists exiting the airport who will wonder "what's that monorail thing?" as they peer out the window of their taxi or rental car.

This concludes my testimony. Mahalo for your attention.

Misc. Com. No. 1707 PH

AIRPORT SERVICE PROVIDED BY U.S. RAPID TRANSIT AND LIGHT RAIL SYSTEMS OPENED SINCE 1970*

City	Name	Date	Miles	Airport	Comments
Atlanta	MARTA	1979	46	Yes	Connected to airport in 1988
Baltimore	Metro	1983	15	No	
Baltimore	MTA	1992	30	Yes	Connected to airport in 1997
Buffalo	Metro	1985	8	No	
Charlotte	CATS	2007	21 by 2025	No	Airport will be served by separate BRT
Dallas	DART	1996	45	No	Separate commuter rail line to airport
Denver	RTD	1994	35	No	
Houston	Metro	2004	8	No	
Las Vegas	Las Vegas Monorail	2004	4	No	
Los Angeles	Metro	1993	73	No	Shuttle bus from Metro station to airport
Miami	Metro	1984	22	No	
Minneapolis	Hiawatha Line	2004	12	Yes	Connected to airport in late 2004
Pittsburgh	The T	1987	25	No	
Portland	MAX	1986	44	Yes	Connected to airport in 2001
Sacramento	RT	1987	37	No	
Salt Lake City	TRAX	1999	18	No	
San Diego	MTS Trolley	1981	46	No	
San Francisco	BART	1972	104	Yes	Connected to airport in 2003
San Jose	VTA	1987	42	No	Shuttle bus from VTA station to airport
St. Louis	MetroLink	1993	46	Yes	Connected to airport in 1994
Washington D.C.	Metro	1976	106	Yes	Connected to airport in 1977

*Excludes short (typically less than 3 miles) "heritage streetcar lines", e.g. in Little Rock, Memphis, Tampa

Attachment G

Property Management • Leasing
Pacific Guardian Center Makai Tower
733 Bishop Street, Suite 1920
Honolulu, HI 96813

tel: (808) 599-5800 fax: (808) 599-5806

Reit Management & Research LLC
PROPERTY MANAGEMENT DIVISION

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

May 5, 2008

Subject: RESOLUTION 08-97 REVISIONS TO THE PUBLIC INFRASTRUCTURE MAP FOR THE PRIMARY URBAN CENTER DEVELOPMENT PLAN

Dear Director Yoshioka,

Our company, Reit Management & Research LLC, is property manager for HRPT Properties Trust ("HRPT")and manages 150 acres of land in the Mapunapuna Industrial area that are owned by companies affiliated with HRPT.

The City Council is currently reviewing revisions to the Public Infrastructure Map for the Primary Urban Center for the Honolulu High Capacity Transit Corridor Project. We are requesting that the PIM amendments include a symbol for a transit station at Mapunapuna.

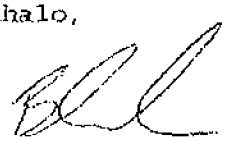
Mapunapuna is already a major job center, and a transit station would be a significant benefit to the thousands of people who work and do business in and around Mapunapuna. A Mapunapuna transit station could also capture ridership from nearby residential communities in Moanalua, Tripler, and eastern Salt Lake. Furthermore, with its proximity to Downtown and its location along the transit corridor between Kapolei and especially urban Honolulu, Mapunapuna has the potential to be redeveloped to include more usable industrial space and other office/commercial and residential land uses. In short, this area has great Transit Oriented Development (TOD) potential.

Redevelopment of this area and an additional transit stop at Mapunapuna will significantly enhance transit ridership along this corridor.

Reit Management and HRPT are willing to assist the City and County of Honolulu to help realize the development of a transit stop at Mapunapuna.

We look forward to working with you. Please don't hesitate to contact me at 599-5800.

Mahalo,



Bradford Leach
Vice President - Pacific Region
Reit Management & Research LLC

Cc: Council Chair Barbara Marshall and all Councilmembers
Mr. Henry Eng, Director DPP

4982

CITY COUNCIL

CITY AND COUNTY OF HONOLULU
HONOLULU, HAWAII 96813-3065 / TELEPHONE 547-7000

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RECEIVED
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DIRECTOR'S OFFICE
DEPT OF
TRANSPORTATION SERVICES

February 2, 2009

Mr. Wayne Yoshioka, Director
Department of Transportation Services
650 South King Street, 3rd Floor
Honolulu, HI 96813

Dear Mr. Yoshioka: Wayne

Re: Comments Relating to the Draft Environmental Impact Statement (DEIS) for the Honolulu Rail Transit Project

Thank you for this opportunity to submit final comments on the aforementioned project on behalf of residents in my district.

My concerns include the following:

I. Ridership Estimates
II. First Segment from East Kapolei to Waipahu
III. Alternative First Segment: Downtown to Kapolei
IV. General Excise Tax Collection
V. Construction Costs
VI. Operation & Maintenance Costs
VII. Transit-Oriented Development
VIII. Other Concerns and Questions

I. RIDERSHIP ESTIMATES

The DEIS lists ridership for the airport alignment as 95,310 daily passengers by the Year 2030 and 87,570 daily passengers by 2030 for the Salt Lake Boulevard alignment (SLB). I am skeptical of both ridership projections, in view of the following:

A. Airport Visitors

Based on data from the Hawaii Tourism Authority, Hawaii has about 7 million mainland and international visitors each year. Of this amount, 71 percent go through Honolulu International

Airport, while the remaining 29 percent go to the neighbor islands. Asian visitors, the majority of whom are Japanese, total approximately 2 million. Japanese visitors usually come in a tour group with a tour package, which includes airline, hotel and ground transportation, and attractions. They usually arrive in the morning. However, because check-in time at the hotel is in the afternoon, ground transportation is waiting for them to take them shopping or elsewhere until check-in. Therefore, they will not be likely to take the rail. **Do ridership projections for the airport alignment take into consideration these figures?**

There are other factors that may discourage visitors from riding the rail. First, the proposed passenger station on Aolele Street is too far away from the passenger terminals.

- **What is the distance from the passenger station on Aolele Street to the domestic and international terminals? To the interisland terminal?**
- **When passengers disembark at the station on Aolele Street, how will they get to both passenger terminals? Will a walkway be built? If so, what's the estimated cost and who will be responsible for the costs of building and maintaining the walkway?**

A second major factor that may discourage visitors from riding rail is that the rail line does not extend into Waikiki where a large majority of our visitors are staying. Having mentioned the above disincentives, **please provide a breakdown in the number of visitors who are expected to ride the airport alignment. Will there be luggage compartments on the train to accommodate our visitors?** Ron Tober, chair of the panel of experts who selected the technology for the rail system, noted several dead periods while personally observing passenger traffic at the airport. Mr. Tober also suggested that the Salt Lake alignment would provide for a better ridership base than the airport. **To get a better gauge on visitor numbers, what are the frequencies for visitor arrivals?**

B. Airport Employees

As for airport employees, there are about 727 state and 15,000 private sector workers at the airport. There are several factors that may discourage employees from riding the rail, foremost of which are the 7,000-plus parking stalls at the airport, which includes the State's new $43 million, 8-level 1,800-stall parking structure, which was built to accommodate future increases in the number of people who use the airport. A good number of State and private sector employees have designated parking stalls at the airport. Furthermore, for security reasons, airlines' crewmembers have their own shuttle service to and from their hotels and back. In view of this, **please provide a breakdown in the number of airport employees who are expected to ride the airport alignment.**

C. Pearl Harbor and Hickam Employees

There are approximately 12,500 civilian employees combined at Pearl Harbor and Hickam. Please note that firstly, these civilian employees already enjoy the convenience of free parking on base. Secondly, the passenger station at Radford Drive is located outside of the base on Kamehameha Highway. To get to their workplace, employees must walk over a mile onto the base. Thirdly, most military personnel either live on base or within a short driving distance. Those who live further away understandably prefer to drive for convenience and emergency purposes. Having mentioned the above, **please provide a breakdown in the number of civilian employees, contractors and military personnel who are expected to ride the airport alignment. Do the ridership numbers take into account these factors?**

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D. Population Estimates From Aloha Stadium to Middle Street

The DEIS on page 4-39 lists the population in the Year 2000 for the transit corridor at about 552,100 and the population of the Aliamanu-Salt Lake area at more than 54,000. If residents in Foster Village and lower Halawa are included, along with several new condo and other housing development makai of Salt Lake Boulevard, the population count will surely be higher—possibly between 60,000 – 70,000. If you add shoppers and employees in the Mapunapuna industrial area, at Salt Lake Shopping Center, Stadium Mall, KMart and the new Target department store (which opens in March 2009), the numbers are quite substantial and add to the daily ridership count.

With the above facts stated, I strongly believe that the over 60,000 residents who live along the 4-mile stretch of Salt Lake Boulevard and those who work and shop in the area—including the new Target store which will open by March 2009—represent a solid and dependable ridership base. These are locals who will ride the rail despite a bad economy.

To get a more accurate picture of population and ridership levels for the Salt Lake Boulevard and airport alignments, please provide answers to the following:

- **What is the projected population count for both alignments only for that portion of the MOS between the Middle Street Transit Center and the Aloha Stadium by the Year 2018 and the Year 2030?**
- **Out of the 95,310 estimated daily riders for the airport alignment, how many passenger boardings are attributed only for that portion between Aloha Stadium and the Middle Street Transit Center when the MOS is completed by 2018? By 2030? Please detail the methods used to arrive at those figures.**
- **Out of the 87,570 estimated daily riders for the Salt Lake Boulevard alignment, how many passenger boardings are attributed only for that portion between Aloha Stadium and the Middle Street Transit Center when the MOS is completed by 2018? By 2030? Please detail the methods used to arrive at those figures.**

II. FIRST SEGEMENT FROM EAST KAPOLEI TO WAIPAHU

I question the rationale for building the first segment from East Kapolei to Waipahu, particularly when it will do little to relieve traffic since gridlock begins where H-1 and H-2 merge. I am convinced that this MOS first segment: 1) will fall woefully short of bringing most commuters to their intended destination of urban Honolulu and beyond; and 2) will cost taxpayers more money, and this scenario will continue until you reach Downtown.

In view of the above, when completed, **1) Who will ride this first segment? 2) What is the estimated ridership for the first segment? 3) What's the estimated funding to complete the first segment from East Kapolei to Waipahu? 4) What is your estimated operation & maintenance costs? 5) What is the estimated taxpayer subsidy for operation & maintenance costs for this first segment? Please justify your numbers.**

III. ALTERNATIVE FIRST SEGMENT: DOWNTOWN TO KAPOLEI

Ron Tober, chair of the technology selection panel, in testimony before the Council's transportation committee on February 22, 2008, stated his preference to begin the project from

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Downtown towards Kapolei rather than from Kapolei towards Downtown. I support Tober's preference.

It seems that finding a suitable baseyard has been a major sticking point for the administration. **Has the City considered construction of a subsidiary or layover baseyard? Can the City later build a permanent baseyard adjacent to the Leeward Community College when the transit line is extended to Waipahu and beyond?**

Since the City already owns the Middle Street Transit Center, could a portion be used as a subsidiary or layover baseyard? There are several reasons for this:

- The transit line will connect to the Middle Street property.
- A subsidiary or layover baseyard could serve as a back-up in case operations at the permanent backyard are halted for any reason.
- The full use of the 100 rail cars for the entire 20-mile long first segment as stated in the DEIS will not be required, since the initial segment of the MOS may only be between 6-8 miles long and not the full 20 miles.
- The design and planning for a subsidiary or layover baseyard can still be incorporated into the overall design and plans for the Middle Street property.

Could a subsidiary or layover baseyard for rail double up to potentially service (repair, maintain and clean) existing City buses and handivans? How many rail cars are needed to service the approximately 6-8 mile long initial segment of the MOS?

IV. GENERAL EXCISE TAX COLLECTION

According to an article in the December 11, 2008, edition of the Honolulu Advertiser, the latest transit tax collection numbers are down from last year due to the bad economy. For the first 20 months of the tax collection, the total amount is $246 million, or $12.3 million per month. Over the 15-year period of General Excise Tax (GET) collection, or 180 months, the City can expect a total of $2.2 billion in GET revenues, which is way short of the $4.054 billion projected in the DEIS. So far, things aren't working out as planned. According to a Honolulu Advertiser article dated January 27, 2009, GET collections for the first half of Fiscal Year 2009 were down nearly 6 percent to $79.4 million (not including the 10 percent collected by the State).

Page 6-4 of the DEIS states that general excise tax surcharge revenues are estimated to be $4.054 billion (YOE $) through FY 2023. For purposes of clarity, please note that Act 247 authorizing the half percent GET collection will be repealed on December 31, 2022—not through Fiscal Year 2023. **What are you basing the amount ($4.054 billion) on? Please provide yearly projections for the half percent GET collection and justifications for those projections.**

Currently, debate on the cost of the 20-mile MOS in today's dollars, ranges from a low of $3.7 billion to about $5.3 billion. The administration maintains that the estimated amount of $3.7 billion, which includes a contingency of $1 billion, is enough to complete the MOS. **With declining GET collection and added cost (airport alignment) comes the question: in case of a deficit in GET collection, how will the City make up the difference?**

AR00001256

V. CONSTRUCTION COSTS

The airport route costs $220 million more than the Salt Lake Boulevard (SLB) route plus $75M for double decking the Lagoon Drive rail station. For the sake of our taxpayers, we need to carefully analyze whether funding estimates are what we can truly afford. If not, we run the risk of repeating the experiences of cities such as Denver, Colorado. Extending Denver's FasTracks system, which was estimated in 2002 to cost $4.7 billion, now costs $7.9 billion. Denver officials are now contemplating whether to raise their sales tax to fund this increase. **In light of this, how confident are the administration and city consultants that the $3.7 billion price tag, which includes a $1 billion contingency, is more than enough to complete the MOS? Would the administration be willing to allow the City Council to cap MOS funding to no more than $3.7 billion? If not, please explain.**

Per the DEIS, we are unsure of the amount of funding that we will receive from the federal government. **To save taxpayer money and avoid cost overruns & delays, would the administration be willing to obtain a Full Funding Grant Agreement (FFGA) and/or a Letter of No Prejudice (LNP) before construction? If not, please explain.**

VI. OPERATION AND MAINTENANCE COSTS

The current policy on fare box revenue can cover only up to 30 percent of TheBus operation and maintenance costs. So currently taxpayer operation and maintenance subsidy is about $130 million. **What are the estimated operation and maintenance costs for the MOS? Taking into consideration that the $2 fare for rail can be used to transfer onto TheBus or TheBoat as long as it's going one way, what is the estimated taxpayer subsidy?**

In my research, New York City's Metropolitan Transportation Authority (MTA) is facing a huge $1.2 billion budget deficit and is proposing to drastically cut service on its subways, buses and commuter railroads. According to the November 20, 2008 edition of the New York Times, the MTA is also proposing to raise fares by 23 percent in 2009 and by another 5 percent hike in 2011. Some riders would be hit harder than others. For example, fares for the Long Island bus would increase by 43 percent. All of these proposals have angered passengers. Under the 23 percent fare hike, the public's share to operate and maintain the subway would increase to 83 percent, while the cost of operating local buses borne by riders would rise to 48 percent. **Will the city resort to fare increase or raising property tax to fund operation and maintenance shortfalls of our multi-modal transit system? What measures are needed to prevent large increases in operation & maintenance costs and large fare increases—similar to the experiences of other cities?**

VII. TRANSIT ORIENTED DEVELOPMENT (TOD)

The SLB alignment extends through Mapunapuna which encompasses 150 acres and is owned by a single landowner who is willing to donate land and help build a passenger station. Adding a station in Mapunapuna would increase ridership, save taxpayer money and provide greater opportunities for affordable housing and potential TOD development. There are other TOD opportunities at Stadium Mall, K-Mart across Stadium Mall, the former Costco site (now Target department store), and the Salt Lake Shopping Center.

- **Where are the TOD potentials along the Airport alignment, and how do they compare to the potential sites along the Salt Lake alignment discussed above?**

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- **Why won't the City exhaust all efforts to include a transit station in the Mapunapuna industrial area, since the landowner is willing to assist with the construction of a transit station, which would reduce costs for the City and taxpayers?**
- **How far along will TOD be in the airport area by the time the MOS is completed in 2018? And 2030?**

VI. OTHER CONCERNS AND QUESTIONS

- Page 4-88 of the DEIS says that the guideway could come within 10 feet of some facades along Dillingham Boulevard and would block views from the upper stories of mixed-use buildings Koko Head of Kalihi Street. **What will be the impacts to residents of condominiums across Dillingham Shopping Plaza from McNeil Street to Waiakamilo Street?**
- Table 3-21 on page 3-39 of the DEIS states that 10 feet of additional right-of-way will be acquired on the makai side of Dillingham, from Puuhale to the Costco Driveway, due to the effects of column placements. **Will businesses and residential homes in the area be affected? If so, which ones? Will this require sidewalks to be moved back or sidewalk space to be smaller?**

I hope the concerns I have expressed will merit your consideration. On behalf of my constituents, I would like to thank you for the opportunity to express our concerns on this very important transportation project for the residents and taxpayers of Oahu.

Very truly yours,

ROMY M. CACHOLA
Councilmember
Council District VII

AR00001258

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, 3RD FLOOR
HONOLULU, HAWAII 96813
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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT1/09-295919R

The Honorable Romy M. Cachola
Honolulu City Council
530 South King Street, Room 202
Honolulu, Hawaii 96813-3065

Dear Councilmember Cachola:

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

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

This first section will address comments received in the January 14, 2009 letter:

1. The General Excise and Use Tax (GET) forecast presented in the Final EIS takes the current economic downturn into account, including lower projections of tourism over the next several years, and slower growth projections in services, contracting, and rentals. The forecast assumes that GET surcharge revenues will grow from current levels as Oahu's population and economic activity increases, and as a function of inflation over the period. The financial plan is a dynamic document that will be updated as conditions warrant. DTS will continue to monitor and update the revenue forecasts and refine the financial plan as the Project proceeds through FTA's New Starts process. As stated in Chapter 6 of the Final EIS, GET collections will raise $3.5 billion by 2022.

In addition, the Federal New Starts program is expected to contribute $1.55 billion and is subject to Congressional approval. The level of Federal funding described in the Final EIS is based on discussions with FTA about a reasonable level of support. While indications are positive, an official FTA commitment cannot be made until Congress acts to approve the Project's appropriation in a Full Funding Grant Agreement. Section 6.6 of the Final EIS describes the risks and uncertainties associated with project funding; however, 30 percent of the Project budget is contingency for just such eventualities.

Section 6.3 of the Final EIS describes the funding sources anticipated to be used to pay for the capital cost of the Project and the City's overall public transportation system. Capital costs of the Project, including finance charges, are expected to be fully paid for by a combination of FTA Section 5309 New Starts Funds and FTA Section 5307 Funds from the Federal government and the GET surcharge levied from 2007 through 2022.

2. As noted in Table 6-1 of the Draft EIS, the total cost of the Airport Alternative, including finance charges, is estimated to be $226 million more than the Salt Lake Alternative, in FY 2008 dollars. The complete station costs for both alternatives are included in this differential cost ($297 million for the Airport Alternative, $255 million for the Salt Lake Alternative).

As shown on page 37 of 38 (Drawing Number RP029) in Appendix A: Conceptual Alignment Plans and Profiles of the Draft EIS, a side platform station without concourse is proposed for the Lagoon Drive Station, which is one of the simplest station designs for the Project. As mentioned above, all costs associated with station construction are included in the costs presented in the Draft and Final EIS documents.

While each of the alternatives includes trade-offs between benefits and impacts, the Airport Alternative from East Kapolei to Ala Moana has been selected as the Preferred Alternative. The identification of the Airport Alternative as the Preferred Alternative was made by the City to comply with the FTA's NEPA regulations that state the Final EIS should identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection is detailed in Section 2.4 of the Final EIS and was based on consideration of the benefits of each alternative, public input on the Draft EIS, and City Council Resolution 08-261 identifying the Airport Alternative as the Project. Further, FTA's NEPA regulations for projects proposed to be funded with major capital investment funds, the level of detail necessarily increases between the Draft EIS and the Final EIS through preliminary engineering work (23 CFR 771.123 (j)).

The station at Honolulu International Airport is about 800 feet from the Interisland Terminal and about 600 feet from the Overseas Terminal. Pedestrian paths will be constructed by the Project that will connect the the rail station to the Overseas and Interisland Terminals. The cost of the pedestrian paths has not been isolated from the overall cost of the station, and maintenance agreements have not yet been completed. In addition, with the Project, bus service will be enhanced between the fixed guideway terminus at Ala Moana Center and Waikiki.

As shown in Table 6-3 of the Draft EIS the year 2030 annual operating and maintenance cost for the rail line is $5 million more for the Airport Alternative than for the Salt Lake Alternative, in current year dollars. Section 6.4 of the Final EIS describes the funding sources to pay for ongoing operations and maintenance costs associated with maintaining the resulting transit system in a state of good repair. Operations and maintenance costs will be paid for from the same sources currently used for TheBus: Federal funding, fare revenues, and subsidies from the City's General and Highway Funds. Funding for guideway maintenance will be covered in the City's annual budgeting process and amounts to between 2 and 3 percent of the City's annual operating budget.

3. Based on the land use information in the travel model, the Salt Lake Alignment shows a population of 45,000 in 2030 and employment of 20,000. The Airport Alignment shows 21,000 population and 55,000 employees.

Figure 3-12 of the Draft EIS shows daily boardings and alightings for each station along the Salt Lake and Airport Alternatives. In 2030, there would be 16,140 daily boardings along the Airport alignment (Aloha Stadium, Pearl Harbor Naval Base, Airport, Lagoon Drive, and Middle Street Stations) and 10,170 daily boardings along the Salt Lake Boulevard alignment (Aloha Stadium, Ala Lilikoi, and Middle Street Stations).

Ridership projections for the forecast year of 2030 have been developed using the travel demand model, which was calibrated against collected traffic and transit ridership information and then validated against current counts to be sure it properly represents travel activity in the transportation system (Section 3.2.1 of the Final EIS). An on-board transit survey was completed in December 2005 and January 2006, and the latest socioeconomic information available as of October 2008 was incorporated. Traffic counts were collected in 2005, 2007, and 2008. . The model is based upon a set of realistic input assumptions regarding land use and demographic changes between now and 2030 and expected transportation levels-of-service on both the highway and public transit systems and is consistent with consultation with FTA.

Regarding the information provided in Attachment E, there is, at this point, no commitment from the FTA for a specific amount of federal funding. The $1.2 billion has been discussed in the past and now $1.55 billion has been identified in the Final EIS and reflected in FTA's approval for the Project to enter Preliminary Engineering. Neither has raised major concerns from the Federal government. All projects identify an anticipated federal amount in their pro forma cost analyses. The FTA will only commit the funding once the full environmental and New Starts processes have been completed. In the Honolulu case, because the percentage of local matching funds (75 percent or more) is so high compared to the average of less than 50 percent, the additional $200 million is still well within a reasonable request.

Total transit ridership is not the same as user benefits. The user benefit measure, in this case, is the time savings that will accrue to users from the implementation of the fixed guideway and the changes that support its operation. Much of the bus system will remain the same or similar to now so it will have little or no effect on user benefits related to the guideway project. In other words, the 1 percent

comparison in the comment includes much more than the effect of the fixed guideway being evaluated in the Draft and Final EIS documents. The difference between Salt Lake and Airport alignments shows that more people (about 7,000 or 8 percent) will ride the guideway on the Airport alignment and save substantially more time than on the Salt Lake alignment. This time savings, as a measure of the contribution of the fixed guideway, is the major reason for the user benefit discrepancy.

The time analysis in the comment assumes all trips travel the entire length of the Salt Lake or Airport alignments. That is not the case. The main reason the Airport option shows an improvement is that there are many trips that are destined to Honolulu International Airport or Pearl Harbor/Hickam for work. The benefit comes from providing better access to the large number of people who cannot easily reach those destinations along the Salt Lake alignment. By contrast, the Salt Lake alignment has fewer trips starting or destined to the area. The fact that there are so many people with trips beginning or ending along the Airport alignment means all those people would benefit from much shorter travel times.

User benefits are calculated not only for the trips using the guideway but also for the overall transportation system as a result of the implementation of the guideway. In addition, the assumptions used in the calculations contained in the comment do not fully account for the true differences between the alternatives, so the conclusion in the comment is inaccurate.

Regarding your comment on visitor ridership, the number of visitors who will use the fixed guideway is relatively small compared to other users. For example, approximately 9,900 visitors will use the fixed guideway daily, of which about 1,800 are traveling to or from the Airport. There will be space available for luggage, but the exact design of the vehicle is not yet known. It is worth noting that the main reason for an Airport alignment is more closely associated with the very high employment numbers along that route than with visitors. The ridership at the Airport accounts for travel activity at the Airport but not by specific country of origin or purpose other than "visitor."

Regarding service to the airport, most of the systems listed in the table in Attachment F did not initially include service to the area airport because it was not in the middle of the alignment, as is the case in Honolulu.

Regarding ridership at Pearl Harbor and Hickam, travel forecasting does not differentiate among the types of employees who will use the fixed guideway. It identifies the population and employees (and other characteristics) in each zone from applicable data sources (e.g., U.S. Census) and determines trips that will use the system based on the system's ability to effectively serve the user's travel needs compared to other options available (e.g., car, bus, etc.). From the location, a sense of the type of employee in the zone of interest (e.g., military or military support) can be estimated, but it is not possible to break it down to military versus contractor versus civilian. The procedure used is in accordance with guidance issued by FTA.

Regarding ridership at the Airport, while travel-demand models do not distinguish among employees within a transportation analysis zone, the number of boardings and alightings at the Airport is a reasonable indication of the level of activity anticipated. As noted in Figure 3-10 of the Final EIS, about 6,000 people will use the Airport station each day, including visitor trips. Employment and population numbers along both the Airport and Salt Lake alignments were provided earlier in this letter.

Regarding transit-oriented development (TOD), the best TOD potential exists at Pearl Harbor and Lagoon Drive along the Airport Alignment and at Ala Lilikoi along the Salt Lake Alignment. Different conditions will determine different types of TOD treatments. In the case of the Airport alignment, the conditions emphasize an employment-oriented TOD treatment. At Ala Lilikoi, the plan will be more residential or neighborhood oriented. Note that the environmental impacts of any TOD projects along the alignment are not part of the Project and will be covered by separate analyses as they occur.

As mentioned in Section 4.19.2 of the Final EIS, TOD is expected to occur in project station areas as an indirect effect of the Project. The increased mobility and accessibility that the Project may provide will also increase the desirability and value of land near stations, thereby attracting new real estate investment in the vicinity (in the form of TOD). Planning and zoning around station areas will be established and conducted by the City's Department of Planning and Permitting under a process in compliance with the City's TOD ordinance.

The decision to select the Airport Alternative as the Preferred Alternative was made by the City Council in consideration of many factors, one of which was the Draft EIS information and the public and agency comments received.

Regarding San Francisco, the airport is a terminal station that was recently added. In the case of Honolulu, the Airport Station will be in the middle of the alignment, and as a result, ridership along the alignment is not dependent on the airport alone. Ridership estimates have been developed based on FTA guidance and FTA has approved these forecasts.

As identified in the Final EIS (Chapter 3, Section 3.2.1), transit ridership forecasts, for rail and bus service, are based on a travel demand forecasting model used by the OahuMPO for the Oahu Regional Transportation Plan. The OahuMPO model is based on "best practices" for urban travel models in the U.S. As indicated in the Final EIS, this modeling approach has proven to be effective in estimating ridership levels in other areas such as Los Angeles County, Salt Lake City, and the Denver region in the last 10 years. This model is based on consultation with the FTA and was reviewed by the FTA prior to being published in the Draft EIS.

As described in Section 2.5.10, Project Phasing, and further in Section 8.6.9, Construction Phasing, in the Final EIS, to support phased opening, the first construction phase must be connected to a maintenance and storage facility, which requires considerable space. No location has been identified closer to Downtown with sufficient

available space to construct a maintenance and storage facility. Therefore, construction will begin between East Kapolei and Leeward Community College. The Project will be constructed in phases to accomplish the following:

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

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

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

The commenter's proposed single-contract delivery method does not inherently reduce financial risk to the City because any such contract would still contain limits on risk accepted by the contractor. Additionally, any risk transferred from the City to the contractor will be paid for by the City through a higher initial contract price. The City may select the level of risk to assume or to transfer to the contractor through any contracting method.

This second section will address comments in your February 2, 2009 letter in the same manner as submitted. Some responses in the first section are applicable to this letter as well:

I. Chapter 3 - Transportation

The ridership at the Airport accounts for travel activity at the Airport but not by specific country of origin or purpose other than "visitor." The Airport Alternative primarily serves major employment destinations. Visitor use accounts for a smaller percentage of ridership on this alternative.

The station is about 800 feet from the Interisland Terminal and about 600 feet from the Overseas Terminal. Pedestrian paths will be constructed by the Project that will connect the rail station to reach the Overseas and Interisland Terminals. The cost of the pedestrian paths has not been isolated from the overall cost of the station, and maintenance agreements have not yet been decided.

The number of visitors who will use the fixed guideway is relatively small compared to other users. For example, approximately 9,900 visitors will use the fixed guideway daily, of which about 1,800 are traveling to or from the Airport. There will be space available for luggage, but the exact design of the vehicle is not yet known. It is worth noting that the main reason for an Airport alignment is more closely associated with the very high employment numbers along that route than with visitors.

While travel-demand models do not distinguish among employees within a transportation analysis zone, the number of boardings and alightings at the Airport is a reasonable indication of the level of activity anticipated. As noted in Figure 3-10 of the Final EIS, about 6,000 people will use the Airport station each day, including visitor trips.

Travel forecasting does not differentiate among the types of employees who will use the fixed guideway. It identifies the population and employees (and other characteristics) in each zone from applicable data sources (e.g., U.S. Census) and determines trips that will use the system based on the system's ability to effectively serve the user's travel needs compared to other options available (e.g., car, bus, etc.). From the location, a sense of the type of employee in the zone of interest (e.g., military or military support) can be estimated, but it is not possible to break it down to military versus contractor versus civilian. This level of detail is difficult to develop at a usable level for forecasting trips. The procedure used is in accordance with consultation with FTA.

II. Chapter 2 – Alternatives Considered

Much of this was addressed in the response to the January 14, 2010 letter. In addition, the first segment is not expected to generate significant ridership. It will primarily be used to test equipment and operations before providing service to larger numbers of passengers as the guideway extends Diamond Head toward Downtown. Only a small number of cars (between two and four) will be needed to serve the first segment when it opens in 2014. The system will not achieve its full capacity and functionality until the line is opened to Downtown, although each segment will be opened as it is completed. As the segments are opened, additional vehicles will be needed as ridership grows.

The engineer's estimate for the first construction segment has not yet been completed. It will be funded primarily with local funds as part of the larger 20-mile project.

The estimated operating and maintenance cost for the fixed guideway is $77 million a year for the entire 20-mile system. This is addressed in Chapter 6 of the Final EIS along with the basis for the numbers. There are no operating cost figures yet for the first segment as the Project in the EIS is defined as the entire length of the corridor. Operating costs for this segment will be relatively low compared to the complete operating costs.

As noted in Chapter 6, City policy states that the transit system as a whole must recover between 27 and 33 percent of operations costs from farebox revenue. Assuming

a 30-percent recovery from fares, that will generate about $23 million a year. The remainder, the subsidy required for the full fixed guideway system or about $54 million, will be budgeted for in the annual City budgeting process as is currently done for TheBus. The subsidy for the first segment between East Kapolei and Waipahu is not yet known, but will depend on ridership levels in the overall transit system.

No location has been identified closer to Downtown with sufficient available property to construct a maintenance and storage facility, either temporary or permanent. In addition, available property at Middle Street is not sufficient to support the vehicle fleet required in the year of opening for the Project. If a larger location were identified than those described in the Draft EIS, then it could be used to service both rail and bus vehicles. No such site has been identified.

The exact number of vehicles needed for the first segment will be determined with the Core Systems contractor, but it is estimated that between two and four vehicles will be needed.

III. Chapter 6 – Cost and Financial Analysis

Cash flow tables in support of the Draft EIS provide a year-by-year forecast of the General Excise and Use Tax (GET) surcharge. This information will be updated periodically as conditions warrant. An updated version of the cash flow information is part of the supporting material in the Final EIS. Chapter 6 of the Final EIS describes the financial resources anticipated to pay for ongoing operating and maintenance costs. Operating and maintenance costs will be paid for from the same sources currently used for TheBus—Federal funding, fare revenues, and City revenues from the General and Highway Funds. It is anticipated that with an integrated bus and rail system in place, a slightly higher percentage of the City's operating budget will be used for transit than is currently the case.

Section 6.3 of the Final EIS describes the funding sources anticipated to be used to pay for the capital costs of the Project and considers the current economic downturn. Capital costs of the Project, including finance charges, are expected to be fully paid for by a combination of FTA Section 5309 New Starts Funds and FTA Section 5307 Funds from the Federal government as well as revenues from the County GET surcharge levied from 2007 through 2022. Section 6.6 of the Final EIS discusses other sources of revenue that could be used if needed.

As discussed previously under Section II of your letter, the estimated 2030 operating and maintenance cost for the Project with the Airport Alternative is about $77 million (2009 dollars) as noted in Table 6-3 of the Final EIS. Fixed guideway operation costs will represent between 2 and 3 percent of the City's annual operating budget.

IV. Chapter 4 – Environmental Analysis, Consequences, and Mitigation (Section 4.18)

Table 6-1 of the Draft EIS shows an estimated cost for the Airport Alternative of $5.4 billion, including finance charges. Given this cost estimate, it is unlikely that the

Project can be completed for $3.7 billion. The $3.7 billion is also a 2006 number, and it is unrealistic to "cap" a cost estimate on a project that will naturally grow over time because of inflation. Furthermore, while we do not anticipate a shortfall, there needs to be some flexibility in the number to account for the ups and downs in the economy over time.

A Letter of No Prejudice (LNP) may be sought soon to take full advantage of local match funding. As per FTA policy, a Full Funding Grant Agreement (FFGA) cannot be requested until the New Starts process of design has been completed. Because the FFGA is anticipated in 2011, a delay in construction to wait for the approval of the FFGA would not save money. Instead, it would be more expensive because it would introduce a substantial inflation cost.

V. Other

The City's fare policy is to recover between 27 and 33 percent of operating costs from fares. Assuming continuation of that policy, the City will raise fares to maintain the required percentage of costs. The other 70 percent or so of the costs is the subsidy of the transit system and will be handled during the City's annual budgeting process. Operating and maintenance costs will be paid for from the same sources currently used for TheBus: Federal funding, fare revenues, and a City subsidy from the General and Highway Funds. This is discussed in Chapter 6 of the Final EIS. The operating costs for the fixed guideway system will be about 25 percent of the overall annual City transit budget. Should costs rise significantly, it will affect all aspects of the transit system, with rail representing only a part of the total.

Operating costs will rise over time. Good management of the system and a focus on cost control as the system and the service expands are necessary to prevent unjustifiable cost increases. These operating practices are not part of the Final EIS and will be determined by City Administration or another operating agency once the system is in operation.

As mentioned in Section 4.18.2 of the Draft EIS, TOD is expected to occur in project station areas as an indirect effect of the Project. The increased mobility and accessibility that the Project may provide will also increase the desirability and value of land near stations, thereby attracting new real estate investment nearby (in the form of TOD). Planning and zoning around station areas will be established and conducted by the City's Department of Planning and Permitting under a process in compliance with the City's new TOD ordinance.

The sidewalk will be moved marginally closer to the buildings on Dillingham Boulevard between McNeil Street and Waiakamilo Street. A median will be constructed in the center of Dillingham Boulevard, and the elevated guideway will be located in the median. The guideway will be about 30 feet above the center of Dillingham Boulevard as it passes by the Dillingham Shopping Plaza and McNeill Street. The view along Dillingham Boulevard is illustrated on Figure 4-28 (Viewpoint 12) of the Draft EIS. As

stated in Section 4.7.3 under the Kalihi to Ala Moana Center Landscape Unit heading, mauka and makai views will be obstructed from various points.

There are partial strip takes planned for the makai side of Dillingham Boulevard from Puuhale to the Costco Driveway. In addition there are full property takes planned for some parcels at the intersection of Mokauea Street and a few other locations between Puuhale Road and Kalihi Street. DTS has right-of-way staff that has met with and will continue to work with every impacted property owner concerning relocation and compensation.

Right-of-way impacts to businesses and residences were included in Appendix B of the Draft EIS and are included in Appendix C of the Final EIS. Sidewalks will be relocated as appropriate.

Table 3-25 in the Final EIS shows effects on bicycle and pedestrian facilities as a result of fixed guideway column placements. This table shows that sidewalks along Dillingham Boulevard will be rebuilt to a width of 6 to 8 feet (they are currently 4 to 7 feet wide).

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

Very truly yours,

WAYNE Y. YOSHIOKA
Director

APPROVED:

Kirk W. Caldwell
Managing Director

Enclosure

MAKIKI/ LOWER PUNCHBOWL/ TANTALUS NEIGHBORHOOD BOARD NO. 1
c/o NEIGHBORHOOD COMMISSION • 530 SOUTH KING STREET ROOM 406 • HONOLULU, HAWAII, 96813
PHONE (808) 768-3710 • FAX (808) 768-3711 • INTERNET: http://www.honolulu.gov

February 6, 2009

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

Dear Mr. Yoshioka,

The Makiki Lower Punchbowl Tantalus Neighborhood Board No. 10 requests a Supplementary EIS (SEIS) to answer the following questions:

1. The DEIS does not answer how the rail effect the individual bus routes on the island. We are especially interested in bus routes 4, 17 and 18 and the buses along Beretania and King Streets. What will the existing routes throughout the island in the year 2020.

2. The latest population was not used in the DEIS that can out in January, 2008 from DBEDT which reduces the population figures that was used in the DEIS. The SEIS would have to show changes in the ridership and employment figures.

3. Although we have been in recession from December, 2007, the DEIS does not reflect that fact. Since this project will extend from 2009 to 2018, the SEIS should consider this recession effects with possible alternatives in financing and construction.

4. We are very concern that the project cost plus the contingency allocation does not take in consideration of this recession. This should be discussed in the SEIS.

Thank you for consideration.

Sincerely,

Charles Carole

Charles Carole
Vice Chair

CC: Ted Matley, FTA Region IX

AR00001269

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, 3RD FLOOR
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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT2/09-299010R

Mr. Charles Carole
Makiki/Lower Punchbowl/Tantalus,
Neighborhood Board No. 10
c/o Neighborhood Commission
530 South King Street, Room 406
Honolulu, Hawaii 96813

Dear Mr. Carole:

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

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

To address your first concern, existing and future 2030 bus routes, including route numbers and frequencies, are provided as Appendix D in the Final EIS. The areas currently served by Routes 4, 17, and 18 will have either the same level of service or more frequent service in 2030 as they do today. Beretania and King Streets, between Downtown and East Honolulu, will have about the same level of service in 2030 as today.

For your second concern, the EIS uses the socio-economic data that was available from OahuMPO at the time that work on the EIS began, based on Department of Business, Economic Development & Tourism (DBEDT's) Population and Economic Projections for the State of Hawaii to 2030 *prepared in August 2004. The 2030 forecast year used in the Draft and Final EISs is consistent with FTA guidance for New Starts projects.*

DBEDT has prepared new forecasts at the County level, Population and Economic Projections for the State of Hawaii to 2035, which was issued in January 2008. For use in travel forecasting, these County-level forecasts must be disaggregated to the level of "Travel Analysis Zones" of which there are 764 on Oahu. At the time of publication of the Draft EIS, these zonal-level forecasts had not been prepared and accepted by OahuMPO. The January 2008 DBEDT forecasts have lower population projected than the August 2004 forecasts. Specifically the January 2008 population forecast for Oahu for 2030 is 3.3 percent lower than the August 2004 forecast. However, the 2030 employment forecast for Oahu from the January 2008 series is 5.8 percent higher than the August 2004 forecast. Thus, it is not clear what the effect on ridership projections would be of using the January 2008 forecast, since the higher employment forecast would likely result in more work trips that are attractively served by transit while the lower population forecast would like result in fewer trips for other purposes.

In response to your third concern, the financial plan for the Project is updated periodically to reflect changing economic conditions, including the economic downturn since the Draft EIS was released. Chapter 6 of the Final EIS reflects the latest information about the General Excise and Use Tax (GET) surcharge collections, escalation rates, costs, etc. The plan will be further updated as conditions warrant throughout the Project. Approximately 30 percent of the project budget is contingency.

Chapter 6 of the Final EIS describes the financial resources anticipated to be needed to pay for the capital costs of the Project and for ongoing operating and maintenance costs. Capital costs of the Project, including finance charges, are expected to be fully paid for by a combination of FTA Section 5309 New Starts Funds from the Federal government and the GET surcharge revenues collected from 2007 through 2022 on Oahu. Operating and maintenance costs will be paid for from the same sources currently used for TheBus, Federal funding, fare revenues, and City revenues from the General and Highway Funds. These funding assumptions are subject to a number of risks and uncertainties, as described in Section 6.6 of the Final EIS.

Special analyses have been undertaken to assess forecasts of GET and construction material escalation rates to gain a better understanding of the cost and revenue elements of the Project.

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

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

BOARD OF WATER SUPPLY

CITY AND COUNTY OF HONOLULU
630 SOUTH BERETANIA STREET
HONOLULU, HI 96843

December 22, 2008

MUFI HANNEMANN, Mayor

RANDALL Y. S. CHUNG, Chairman
SAMUEL T. HATA
ALLY J. PARK
ROBERT K. CUNDIFF
MARC C. TILKER

CRAIG I. NISHIMURA, Ex-Officio
BRENNON T. MORIOKA, Ex-Officio

CLIFFORD P. LUM
Manager and Chief Engineer

DEAN A. NAKANO
Deputy Manager and Chief Engineer

TO: WAYNE Y. YOSHIOKA, DIRECTOR
DEPARTMENT OF TRANSPORTATION SERVICES

FROM: for ~~KEITH S. SHIDA, PROGRAM~~ ADMINISTRATOR
CUSTOMER CARE DIVISION

SUBJECT: YOUR LETTER DATED NOVEMBER 12, 2008 ON THE HONOLULU HIGH-CAPACITY TRANSIT CORRIDOR PROJECT DRAFT ENVIRONMENTAL IMPACT STATEMENT/SECTION 4 (f) EVALUATION

Thank you for the opportunity to comment on the Honolulu High-Capacity Transit Corridor Project.

The construction drawing should be submitted for approval.

The construction schedule should be coordinated to minimize the impact to existing Board of Water Supply customers.

If you have any questions, please contact Robert Chun at 748-5443.

cc: Mr. Ted Matley, FTA Region IX

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TRANSPORTATION SERVICES

Water for Life . . . Ka Wai Ola

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010 RT12/08-292845R

MEMORANDUM

TO: WAYNE HASHIRO, P.E., DIRECTOR AND CHIEF ENGINEER
BOARD OF WATER SUPPLY

ATTN: KEITH S. SHIDA, PROGRAM ADMINISTRATOR
CUSTOMER CARE DIVISION

FROM: WAYNE Y. YOSHIOKA, DIRECTOR

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

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

Construction drawings will be submitted to the Board of Water supply as part of the one-time review by City agencies. This will be done by the Final Design contractor, per construction segment, as designs become available. In addition, the City will coordinate the Project's design and construction schedule with the Board of Water Supply and will minimize impacts to Board of Water Supply customers, when feasible.

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

WAYNE Y. YOSHIOKA

Enclosure

DEPARTMENT OF DESIGN AND CONSTRUCTION
CITY AND COUNTY OF HONOLULU
650 SOUTH KING STREET, 11TH FLOOR
HONOLULU, HAWAII 96813
Phone: (808) 768-8480 • Fax: (808) 523-4567
Web site: www.honolulu.gov

MUFI HANNEMANN
MAYOR

RUSSELL H. TAKARA, P.E.
ACTING DIRECTOR

DEPUTY DIRECTOR

CDA 09-296086

RECEIVED
09 JAN 23 A 9:07
DIRECTOR'S OFFICE
CITY & CO. OF
TRANSPORTATION SERVICES

January 22, 2009

MEMORANDUM

TO: WAYNE Y. YOSHIOKA, DIRECTOR
DEPARTMENT OF TRANSPORTATION SERVICES

FROM: RUSSELL H. TAKARA, P.E., ACTING DIRECTOR
DEPARTMENT OF DESIGN AND CONSTRUCTION

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

Thank you for the opportunity to review and comment on the Draft Environmental Impact Statement (DEIS) for the Honolulu High-Capacity Transit Corridor Project. We wish to provide the following comments regarding the design and construction of the guideway structure and appurtenances within the road right-of-way:

1. The DEIS has provided only limited discussion of the placement of the support columns and associated foundations for the elevated guideway structure and transit stations in relation to its impact to the existing utilities within the road right-of-way. In our experience in doing roadway projects, relocation of utilities has been a challenge because of the sheer number of existing utilities and the limited available space below the roadway pavement within the public right-of-way. These relocations would impact the construction related effect on traffic, and should be included in the discussion of Section 3.5.3, Construction-related Effects on Traffic, on page 3-46 of the DEIS, and also addressed in Section 3.5.7, Mitigation of Construction-related Effects, Maintenance of Traffic Plan, on page 3-48, including Table 3-26, Potential Peak-Period Temporary Lane Closures During Construction. In addition, with the aging existing infrastructure, oftentimes the construction activities, coupled with heavy equipment traversing over the construction area, has resulted in existing utilities breaking. In consideration of this, the project should consider the reconstruction of the roadway sections where the guideway support columns and station foundations are located within the City streets, and also the replacement of the appropriate utilities, so that it will not be necessary to come back in soon after with another road rehabilitation project that will involve additional cost and disruption to the traveling public and residents in the area.

2. The estimated cost for the utility relocations is not included as a separate item in the buildup of the transit system costs. What is this estimated amount, and how will the project proceed with the utility agreements with the various utility companies and agencies for the cost share for these relocations?

As the project moves forward, we would appreciate the close coordination by your project staff for transit project's design elements that may impact our department's CIP programs. If there are any questions, you may contact me at 768-8481.

MC/SK:ct (287692)

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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

MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT1/09-296488R

MEMORANDUM

TO: CRAIG I. NISHIMURA, P.E., DIRECTOR
DEPARTMENT OF DESIGN AND CONSTRUCTION

FROM: WAYNE Y. YOSHIOKA, DIRECTOR

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

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

As discussed in Section 4.18.2 of the Final EIS, "Communication and coordination have been initiated with the affected utility agencies and companies and will continue throughout design and construction. HDOT will be involved with utility coordination for utility work in state roadways and roadway rights-of-way. Design criteria will govern all new utility construction outside of buildings, as well as the support, maintenance, relocation, and restoration of utilities encountered or affected by project construction." Text has been added to Sections 3.5.3 and 3.5.5 of the Final EIS regarding the effects of utility relocation on traffic. As part of Design criteria, City agencies will be part of the "one-time" review of design and construction methods. This review will be conducted by the final design contractor, per construction segment. DTS will

continue to coordinate with utilities, agencies and companies, regarding construction activities to minimize disruption of service.

The cost of utility relocations is included in the total capital estimate presented in Chapter 6 of the Final EIS and will be refined as design of the Project is completed.

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

WAYNE Y. YOSHIOKA

Enclosure

DEPARTMENT OF DESIGN AND CONSTRUCTION
CITY AND COUNTY OF HONOLULU
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HONOLULU, HAWAII 96813
Phone: (808) 768-8480 • Fax: (808) 523-4567
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296781

MUFI HANNEMANN
MAYOR

RUSSELL H. TAKARA, P.E.
ACTING DIRECTOR

DEPUTY DIRECTOR

January 23, 2009

RECEIVED
09 JAN 26 P12:05
DEPARTMENT OF
TRANSPORTATION SERVICES

MEMORANDUM

TO: WAYNE Y. YOSHIOKA, ACTING DIRECTOR
DEPARTMENT OF TRANSPORTATION SERVICES

FROM: RUSSELL H. TAKARA, P.E., ACTING DIRECTOR

SUBJECT: HONOLULU HIGH-CAPACITY TRANSIT CORRIDOR PROJECT DRAFT ENVIRONMENTAL IMPACT STATEMENT/SECTION 4(F) EVALUATION

Thank you for giving us the opportunity to comment on the above Draft Environmental Impact Statement.

The Department of Design and Construction has additional comments as follows:

- At several places in the text of the DEIS there are references to Mother Waldron Park. For clarification, Mother Waldron *Neighborhood* Park includes both State- and City-owned lands, but is City-operated, and is the park's officially recognized name. The comfort station and other Art Deco-themed structures in this park are on the State Register of Historic Places. We would appreciate you making appropriate corrections and clarifications where needed.

- We suggest consideration be given to locating the proposed future McCully transit station to the *Diamond Head side* of the McCully Street-Kapi'olani Boulevard intersection. There is a unique opportunity at this location that land acquired to provide access to the transit station may also be secondarily used to serve the Ala Wai Community Park's users, as well as student, faculty, and staff of Tokai University. This would serve to locate the transit station more equi-distant between the Convention Center and Date Street transit stations and be more advantageous in general to the public, in our opinion. We also believe this station location would be more in line with the project objective stated in Section 4.4 of the DEIS of sharing benefits with other community services and government-owned facilities.

Should you have any questions, please call Clifford Lau, Chief, Facilities Division, at 768-8483.

RHT:lt (287692)

c: DDC Facilities Division

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT1/09-296781R

MEMORANDUM

TO: CRAIG I. NISHIMURA, P.E., DIRECTOR
DEPARTMENT OF DESIGN AND CONSTRUCTION

FROM: WAYNE Y. YOSHIOKA, DIRECTOR

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

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

In response to your comment, references to the park name were changed to Mother Waldron Neighborhood Park in the Final EIS. The ownership of the park and the park's listing on the State Register of Historic Places have been changed in both Section 4.16 and Chapter 5 of the Final EIS.

Regarding the location of the future McCully Station, the Project has logical termini and independent utility from any extensions that may be constructed in the future. The future extensions to East Kapolei, Salt Lake Boulevard, Waikiki, and UH Manoa are discussed in the cumulative impacts sections of Chapters 3 and 4 of the Final EIS. The future extensions are not part of the Project; thus, they are not required to be evaluated under Chapter 343 of the Hawaii

Revised Statutes and NEPA. Under NEPA, environmental analysis is only required when there is a proposed action by a Federal agency. Because the future extensions are not proposed for implementation at this time, they are not part of the Project studied in the Final EIS. It would be premature to undertake an environmental analysis of the extensions (beyond the cumulative impacts analysis) because they are not part of the proposed action to be taken by the City and FTA. If the future extensions are proposed for implementation in the future, environmental analysis of the extensions (including associated station locations) and appropriate alternatives will be undertaken at that time.

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

WAYNE Y. YOSHIOKA

Enclosure

DEPARTMENT OF ENVIRONMENTAL SERVICES
CITY AND COUNTY OF HONOLULU
1000 ULUOHIA STREET, SUITE 308, KAPOLEI, HAWAII 96707
TELEPHONE: (808) 768-3486 • FAX: (808) 768-3487 • WEBSITE: http://www.co.honolulu.gov

MUFI HANNEMANN
MAYOR

DIRECTOR
KENNETH A. SHIMIZU
DEPUTY DIRECTOR
ROSS S. TANIMOTO, P.E.
DEPUTY DIRECTOR

IN REPLY REFER TO:
PRO 09-001

January 7, 2009

Mr. Ted Matley
FTA Region IX
201 Mission Street, Suite 1650
San Francisco, California 94105

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

Dear Messieurs:

SUBJECT: Honolulu High-Capacity Transit Corridor Project
Draft Environmental Impact Statement/Section 4(f) Evaluation,
November 2008

Attached are the review comments from the Department of Environmental Services.

If you have any questions regarding these comments, the responsible individuals and their phone numbers are listed above their respective comments.

Sincerely,

Kenneth A. Shimizu
Deputy Director

Attachment

RECEIVED
09 JAN 8 P12:24
DIRECTOR'S OFFICE
DEPT OF
TRANSPORTATION SERVICES

Document Name: Honolulu High-Capacity Transit Corridor Project, Draft Environmental Impact Statement/Section 4(f) Evaluation
Document Date: November 2008

Reviewer: Storm Water Quality Branch
Contact: Gerald Takayesu, Branch Head
Phone: (808) 768-3287
Date: December 24, 2008

Index	Section	Page No.	Comment	Response
1.	Chapter 343 Draft EIS Summary Sheet	N/A	No city permits?	
2.	Executive Summary	S-7	Water Resources – Need to mention BMPs to minimize pollution during construction.	
3.	Chapter 4	4-9	Environmental Effects, Proposed Mitigation Measures – Need to address BMPs during construction and spill prevention.	
4.	Chapter 4	4-125	Environmental consequences common to all alternatives – Wouldn't construction related pollution and contamination be less under the no-build alternative?	
5.	Chapter 4	4-127	Regulatory context for Surface and Marine Waters – Need to mention TMDLs for water quality limited segments listed under the State Section 303(d) list and corresponding waste load allocations to the City.	
6.	Chapter 4	4-128	Affected Environment, Surface and Marine Waters, Streams – Draft EIS mentions Section 303(d) list of impaired water bodies. Should mention TMDLs and waste load allocations to the City.	
7.	Chapter 4	4-132	Environmental Consequences, Surface and Marine Waters – EIS mentions typical post construction BMPs, but should also address BMPs during construction.	
8.	Chapter 4	4-162	Storm Water Quality – Need to address permanent post-construction BMPs.	

AR00001284

Document Name: Honolulu High-Capacity Transit Corridor Project, Draft Environmental Impact Statement/Section 4(f) Evaluation
Document Date: November 2008

Index	Section	Page No.	Comment	Response
9.	Chapter 4	4-174	Water Resources – Need to correct statement that "Water resources have been degraded by past residential and farm development." Much of the degradation is also due to industry and the military.	
10.	Chapter 4	4-176	List of Anticipated Permits – Might consider adding State NPDES industrial permits and hydrotesting permits; DPP building, grading, stockpiling, and construction dewatering permits; and ENV effluent discharge permits for hydrotesting.	

AR00001285

Document Name: Honolulu High-Capacity Transit Corridor Project, Draft Environmental Impact Statement/Section 4(f) Evaluation
Document Date: November 2008

Reviewer: Office of Administrative Support
Contact: Lisa Kimura, CE V
Phone: (808) 768-3455
Date: January 5, 2009

Index	Section	Page No.	Comment	Response
1.	General	N/A	ENV requests to be included in the review of design documents and construction plans, to review for impacts to our facilities and services, and for coordination with on-going and proposed wastewater system projects.	
2.	General	N/A	Please note that the proposed alignment(s) either cross or run parallel to the following sensitive wastewater facilities: • Waimalu Force Main • Halawa Force Main • Aliamanu Force Main #1 • Aliamanu Force Main #2 • Fort Shafter Force Main • Kamehameha Highway Force Main • 30-inch trunk sewer near the Aloha Stadium • Awa Street Force Main • Beachwalk Force Main	

AR00001286

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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HONOLULU, HAWAII 96813
Phone: (808) 768-8305 • Fax: (808) 768-4730 • Internet: www.honolulu.gov

MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT1/09-294740R

MEMORANDUM

TO: TIMOTHY E. STEINBERGER, DIRECTOR
DEPARTMENT OF ENVIRONMENTAL SERVICES

FROM: WAYNE Y. YOSHIOKA, DIRECTOR

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

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

1. The permit list for the Project has expanded and includes City permits. See Section 4.21 Anticipated Permits and Approvals in the Final EIS specifically Table 4-40.

2. and 3. Best Management Practices (BMPs) to manage construction stormwater and pollution have been added to Section 4.18 of the Final EIS. BMPs will be developed to mitigate potential impacts to streams and wetlands. Agency reviews conducted as part of the permit process will ensure that the permits identify proper control techniques to be implemented during construction. BMPs for in-water work and potential impacts of construction on streams and wetlands where no in-water work is required is discussed in the Final EIS Water Resources, Section 4.18.10.

4. Construction-related impacts would be less under the No Build Alternative and are discussed in Section 4.17 of the Draft EIS.

5. and 6. The Hawaii Department of Health (HDOH) is in the process of determining Total Daily Maximum Loads (TMDLs) and waste load allocations for these waters. See Section 4.14.1, Background and Methodology, for summaries on water resources located in the study corridor that are regulated by a variety of Federal and State programs. The transit project will be coordinating with other City and County agencies to determine how to divide the City's allocations.

7. BMPs mitigation measures for construction stormwater were discussed in Section 4.17.8 Contaminated Media, Stormwater Quality, and Solid Waste of the Draft EIS and Section 4.18.10 Water Resources in the Final EIS.

8. Permanent Best Management Practices have been developed and are included in 4.14.3 of the Final EIS.

9. The sentence has been modified in Section 4.19.3 of the Final EIS to read "Water resources have been degraded by past residential, industrial, military and farm development."

10. As stated above, the list of permits needed for the Project has been revised in the Final EIS Section 4.21.

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

WAYNE Y. YOSHIOKA

Enclosure

DEPARTMENT OF FACILITY MAINTENANCE

CITY AND COUNTY OF HONOLULU

1000 Uluohia Street, Suite 215, Kapolei, Hawaii 96707
Phone: (808) 768-3343 • Fax: (808) 768-3381
Website: www.honolulu.gov

MUFI HANNEMANN
MAYOR

GEORGE "KEOKI" MIYAMOTO
ACTING DIRECTOR

IN REPLY REFER TO:
DRM 09-32

January 16, 2009

MEMORANDUM

TO: WAYNE Y. YOSHIOKA, ACTING DIRECTOR
DEPARTMENT OF TRANSPORTATION SERVICES

FROM: GEORGE "KEOKI" MIYAMOTO, ACTING DIRECTOR
DEPARTMENT OF FACILITY MAINTENANCE

SUBJECT: HONOLULU HIGH-CAPACITY TRANSIT CORRIDOR
DRAFT ENVIRONMENTAL IMPACT STATEMENT (DEIS)

Thank you for the opportunity to review and comment on the DEIS for the Honolulu High-Capacity Transit Corridor dated November 2008.

We request that any required improvements or reconstruction to City roadways and facilities within these roadways associated with the subject project be constructed in accordance to City and County Standard Details.

Should you have any questions, please call Charles Pignataro of the Division of Road Maintenance, at 768-3697.

RECEIVED
09 JAN 20 P 2:48
DEPT OF TRANSPORTATION SERVICES
CITY & COUNTY OF HONOLULU

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, 3RD FLOOR
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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-335140

MEMORANDUM

TO: JEOFFREY S. CUDIAMAT, P.E., DIRECTOR
GEORGE "KEOKI" MIYAMOTO, DEPUTY DIRECTOR
DEPARTMENT OF FACILITY MAINTENANCE

FROM: WAYNE Y. YOSHIOKA, DIRECTOR

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

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Your request has been noted. Construction within city streets will comply with City and County Standard Details.

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

WAYNE Y. YOSHIOKA

Enclosure

HONOLULU FIRE DEPARTMENT

CITY AND COUNTY OF HONOLULU

636 South Street
Honolulu, Hawaii 96813-5007
Phone: 808-723-7139 Fax: 808-723-7111 Internet: www.honolulu.gov/hfd

MUFI HANNEMANN
MAYOR

KENNETH G. SILVA
FIRE CHIEF

ALVIN K. TOMITA
DEPUTY FIRE CHIEF

November 28, 2008

TO: WAYNE YOSHIOKA, DIRECTOR
DEPARTMENT OF TRANSPORTATION SERVICES

FROM: KENNETH G. SILVA, FIRE CHIEF

SUBJECT: HONOLULU HIGH-CAPACITY TRANSIT CORRIDOR PROJECT
DRAFT ENVIRONMENTAL IMPACT STATEMENT

In response to your letter of November 12, 2008, regarding the above-mentioned subject, the Honolulu Fire Department (HFD) reviewed the material provided and requires that the following be complied with:

1. Provide a fire apparatus access road for every facility, building, or portion of a building hereafter constructed or moved into or within the jurisdiction when any portion of the facility or any portion of an exterior wall of the first story of the building is located more than 150 feet (45 720 mm) from a fire apparatus access road as measured by an approved route around the exterior of the building or facility. (1997 Uniform Fire Code, Section 902.2.1.)

2. Provide a water supply, approved by the county, capable of supplying the required fire flow for fire protection to all premises upon which facilities or buildings, or portions thereof, are hereafter constructed or moved into or within the county.

   On-site fire hydrants and mains capable of supplying the required fire flow shall be provided when any portion of the facility or building is in excess of the 150 feet (45 720 mm) from a water supply on a fire apparatus access road, as measured by an approved route around the exterior of the facility or building. (1997 Uniform Fire Code, Section 903.2, as amended.)

3. Submit civil drawings to the HFD for review and approval.

RECEIVED
08 DEC 2 P1:11
ENGINEERS OFFICE
DEPT OF TRANSPORTATION SERVICES

Should you have any questions, please call Battalion Chief Socrates Bratakos of our Fire Prevention Bureau at 723-7151.

KENNETH G. SILVA
Fire Chief

KGS/SY:jl

cc: Ted Matley, FTA Region IX

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, 3RD FLOOR
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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT12-08-290258R

MEMORANDUM

TO: KENNETH G. SILVA, FIRE CHIEF
HONOLULU FIRE DEPARTMENT

FROM: WAYNE Y. YOSHIOKA, DIRECTOR

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

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The Honolulu Fire Department's participation regarding safety and security planning is expected to continue throughout the duration of the Project. DTS will comply with the requirements stated in your letter commenting on the Draft EIS in the following manner:

1. The Project is being designed to meet all applicable fire code requirements, including provision of appropriate fire apparatus, access roads, and adequate water supply for fire-fighting operations.

2. The Project is being designed to meet all applicable fire code requirements. The Project will comply with fire protection regulations and will continue to work with the Honolulu Fire Department throughout Final Design and construction.

3. DTS will submit civil drawings to the Honolulu Fire Department for review as required by established review practices.

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

WAYNE Y. YOSHIOKA

Enclosure

DEPARTMENT OF PARKS AND RECREATION
CITY AND COUNTY OF HONOLULU
KAPOLEI HALE • 1000 ULUOHIA STREET, SUITE 309 • KAPOLEI, HAWAII 96707
TELEPHONE: (808) 768-3003 • FAX: (808) 768-7053 • INTERNET: www.honolulu.gov

NOEL HANNEMANN
MAYOR

LESTER K.C. CHANG
DIRECTOR

GAIL Y. HARAGUCHI
DEPUTY DIRECTOR

December 8, 2008

TO: WAYNE Y. YOSHIOKA, DIRECTOR
DEPARTMENT OF TRANSPORTATION SERVICES

FROM: LESTER K. C. CHANG, DIRECTOR

SUBJECT: DRAFT ENVIRONMENTAL ASSESSMENT
HONOLULU HIGH-CAPACITY TRANSIT CORRIDOR PROJECT

Thank you for the opportunity to review and comment on the Draft Environmental Assessment for the Honolulu High-Capacity Transit Corridor Project.

The Department of Parks and Recreation has no comment.

Should you have any questions, please contact Mr. John Reid, Planner, at 768-3017.

LESTER K. C. CHANG
Director

LKCC:jr
(289178)

cc: Office of Environmental Control
Ted Matley, FTA Region IX

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08 DEC 10 A10:47

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT12/8-290872R

MEMORANDUM

TO: LESTER K.C. CHANG, DIRECTOR
DEPARTMENT OF PARKS & RECREATION

FROM: WAYNE Y. YOSHIOKA, DIRECTOR

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

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

Your comment has been noted. Coordination with the Department of Parks and Recreation will continue throughout the duration of the Project.

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

WAYNE Y. YOSHIOKA

Enclosure

DEPARTMENT OF PLANNING AND PERMITTING
CITY AND COUNTY OF HONOLULU
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2994/8

MUFI HANNEMANN
MAYOR

DAVID K. TANOUE
ACTING DIRECTOR

ROBERT M. SUMITOMO
DEPUTY DIRECTOR

BA

January 29, 2009

MEMORANDUM

TO: WAYNE Y. YOSHIOKA, DIRECTOR
DEPARTMENT OF TRANSPORTATION SERVICES

FROM: DAVID K. TANOUE, ACTING DIRECTOR
DEPARTMENT OF PLANNING AND PERMITTING

SUBJECT: REQUEST FOR RAIL TRANSIT STATION DRAWINGS

We are requesting a set of the latest Station Drawings (10 percent completion) for our City's Honolulu Rail Transit Project. The preliminary information will allow our department to better understand the intended operation of the transit system and evaluate its effects on circulation and land use. This information will not only complement our work on on-going and subsequent Transit-Oriented Development (TOD) plans, and improve the efficiency of our TOD process, but also assist you with any permitting issues or requirements raised by these more detailed drawings.

We appreciate your department's willingness to work with the Department of Planning and Permitting on this effort. Should you have any questions, please call Bonnie Arakawa of my staff at 768-8048.

DKT:lh

cc: Site Development Division

P:\PolicyDocuments\Action Plans\Waipahu Neighborhood Plan\Correspondence\DPPmemoDTS

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09 JAN 29 P 2:40
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DEPT OF
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DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT1/09-297418R

MEMORANDUM

TO: DAVID K. TANOUE, DIRECTOR
DEPARTMENT OF PLANNING & PERMITTING

FROM: WAYNE Y. YOSHIOKA, DIRECTOR

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

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

As requested, station plans were provided to the Department of Planning and Permitting (DPP) on February 24, 2009. DTS will continue to work with DPP regarding permitting for the Project.

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

WAYNE Y. YOSHIOKA

Enclosure

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FEB 10 2009
PARSONS BRINCKERHOFF
HONOLULU, HAWAII

MUFI HANNEMANN
MAYOR

DAVID K. TANOUE
ACTING DIRECTOR

ROBERT M. SUMITOMO
DEPUTY DIRECTOR

2008/ELOG-2787(mh)

February 6, 2009

MEMORANDUM

TO: WAYNE Y. YOSHIOKA, DIRECTOR
DEPARTMENT OF TRANSPORTATION SERVICES

FROM: for DAVID K. TANOUE, ACTING DIRECTOR
DEPARTMENT OF PLANNING AND PERMITTING

SUBJECT: HONOLULU HIGH-CAPACITY TRANSIT CORRIDOR PROJECT DRAFT ENVIRONMENTAL IMPACT STATEMENT (DEIS)/SECTION 4(f) EVALUATION

In response to your request for comments on the Honolulu High-Capacity Transit Corridor Project DEIS, the Department of Planning and Permitting (DPP) has the following comments:

1. The Final Environmental Impact Statement (FEIS) should discuss any mitigation measures to be taken for loss in property values along the corridor where there are adverse impacts.

2. The FEIS should include a listing of all properties that are to be acquired in full or in part, their addresses and TMKs, and the estimated value at the time of acquisition.

3. *p. 1-7, Figure 1-4 Major Activity Centers in the Study Corridor:* Kalaeloa Industrial Park should be identified as "proposed".

4. *p. 2-25, Figure 2-14 East Kapolei Station (All Build Alternatives):* The map extent of this figure should be expanded to the southeast to show the pedestrian access and connectivity between the East Kapolei Station and the planned Kroc Community Center.

5. *p. 3-34, Table 3-18 Mode of Access to Fixed Guideway Stations – 2030 Build Alternatives:* This table should include bicycling as a mode of access. Bicycling is a key component of an integrated inter-modal transportation network and should be added as mode of access to Table 3-18 in the FEIS.

6. *p. 3-35, Access to Fixed Guideway Stations:* This section states that each station would have facilities for parking bikes, and each guideway vehicle would be designed to accommodate bicycles during off-peak hours. Bicycling as a mode of transportation should be strongly encouraged, and thus guideway vehicles should also be able to accommodate bicycles during peak hours. This should be clarified in the FEIS.

   This section also states that sidewalks and crosswalks are currently available at stations or would become available as streets and sidewalks are built in developing areas. Emphasis should also be on creating an inter-modal transportation network in the neighborhoods surrounding the stations. The FEIS should address the need for identifying and developing safe and convenient pedestrian ways and bikeways to connect the existing residential areas with the transit stations. Sidewalks and bike paths leading to and from the transit station should be planned, designed, and constructed before the transit station opens.

7. *p. 3-41, Spillover Parking Effects on Station Areas:* This section states that the West Loch, Pearlridge, Iwilei, and Ala Moana Center stations were projected to have the largest demand for spillover parking and were selected for further study. A detailed table should be provided in the FEIS that shows for the Build Alternatives the spillover demand in the morning and evening peak periods for each of the four stations. Public input from community meetings held for the Waipahu Neighborhood TOD Plan indicated that residents felt strongly about the need for a park-and-ride facility at the West Loch station, and that without such a facility there would be spillover parking, particularly from residents living mauka of the freeway.

8. *p. 3-41, last bullet:* Although we agree with this bullet, it should be removed from this section or clarified. Spillover parking near stations would largely be from residents living in the surrounding neighborhoods and communities that are driving to the station. Residents living in future development in the station areas would have the greatest likelihood of walking to the transit station, and thus would not be a significant contributor to spillover parking.

9. *p. 3-43, Effects on the Bicycle and Pedestrian Network:* The FEIS should discuss ongoing work on the Oahu Bike Plan and discuss key recommendations of the Plan, if available, as they pertain to developing bike paths that link surrounding neighborhoods with the transit stations.

The FEIS should also disclose if pedestrians who are not taking transit would be allowed to use the mezzanine level of stations to cross streets. Creating a safe and convenient way for pedestrians to cross heavily traveled roadways is critical, particularly with the anticipated increase in pedestrian activity from transit patrons and TOD in the station areas, and a growing elderly population.

10. *p. 3-44, Parking:* This section states that parking surveys of on-street unrestricted parking supply would occur approximately six (6) months before implementation of the fixed guideway service. The FEIS should provide a schedule relating to when potential strategies will be decided and implemented vis a vis operation of the transit system.

11. *p. 4-12, Figure 4-2 Planning Regions and Planned Land Use:* This figure should include the routes of planned extensions to the west and east as shown on Figures 2-5 and 2-8, respectively.

12. *p. 4-13, Future Land Use Plans and Policies:* This section states that TOD Special Districts would encourage mixed-use, high-density, walkable communities around transit stations. The objective of TOD is not necessarily to promote high-density development, but rather development that is concentrated around the transit stations and at densities that are contextually appropriate for a given community.

    The FEIS should also mention the Waipahu Town Plan (1995), Pearl Harbor Historic Trail Master Plan (2001), and Kalihi-Palama Action Plan (2004) as promoting transit-supportive development patterns, pedestrian-friendly environments, and an inter-modal transportation network.

13. *p. 4-20, Common to All Build Alternatives:* In addition to how the proposed project is consistent with the 'Ewa Development Plan, the Final EIS should also discuss how the proposed project is consistent with section 4.1.3.2 Planned Transit Corridor, pages 4-8 and 4-9, of the Central O'ahu *Sustainable* Communities Plan. The Final EIS should further discuss how the proposed project is consistent with the rapid transit corridor as shown on the Public Facilities Map in Appendix A of both the 'Ewa Development Plan and Central O'ahu *Sustainable* Communities Plan. Furthermore, the Final EIS should include a discussion of how the proposed project is consistent with the Public Infrastructure Maps for Ewa, Central O'ahu, and the Primary Urban Center.

14. *p. 4-43, Common to All Build Alternatives:* This section states that since the transit system will be elevated, it would not create a physical barrier to pedestrian

or other forms of travel within the study corridor. However, with anticipated increase in pedestrian activity from transit patrons and TOD in the station areas, mitigative measures to assure pedestrian safety should be identified in the FEIS. Pedestrians, especially the elderly, disabled, and young children, need safe access and adequate time to cross heavily traveled roadways.

15. *p. 4-57, Section 4.7.1 Background and Methodology:* There is mention that the Diamond Head and Punchbowl Special Districts may be affected but they are not discussed any further. It is not certain how these two (2) districts are impacted by the proposal. The Final EIS should discuss how the proposal meets the objectives and design guidelines for each of the Special Districts – Chinatown, Hawaii Capital, and Waikiki.

16. There should be more discussion about alternative track profiles and configurations that would help to mitigate the negative visual impacts. This should include the various components of the tracks, i.e., tracks (height, widths, and profiles), columns (diameters, configurations, and heights), materials and finishes (concrete and steel), and landscaping (screening).

17. *p. 4-61, Kalihi to Ala Moana Center Landscape Unit*: Missing from this bulleted list of panoramic views is the view from the Kakaako Waterfront Park toward Punchbowl and the Koolau Range (PUC DP, June 2004). Furthermore, the panoramic and mauka-makai view corridors identified in the PUC DP should be graphically shown on a map in the FEIS.

18. *p. 4-63, Table 4-10:* Item 13, which describes the visual impact of the Chinatown station and guideway, conflicts with the description of environmental consequences to neighborhoods (Downtown) discussed on page 4-44. The latter states that the Project would not create a new barrier or affect the physical character of adjacent communities. This should be clarified in the FEIS and mitigative measures identified.

    The FEIS should include visual simulations of each station in the Build Alternatives that show the mass of the station buildings in relationship to surrounding land uses/structures. The FEIS should include elevation views of each station that show the station from all sides in relation to surrounding uses. For example, views of the Salt Lake station should also be from the south side looking towards the three-story apartments. The FEIS should also include visual simulations of the Build Alternative that illustrates the visual impact to panoramic views and mauka-makai view corridors identified in the PUC DP.

19. *p. 4-75, Figure 4-27 Viewpoint 11 – Dillingham Boulevard at Kalihi, looking Mauka:* Regarding the simulation with the fixed guideway, what is the distance from the top of the future transit vehicle to the existing overhead utility lines. There may be a need to raise or relocate the existing lines. Please consult with Hawaiian Electric Company, Inc. regarding this matter for similar situations along the corridor since there is generally a safe electrical distance requirement.

20. *p. 4-84, Figure 4-36 Viewpoint 20 – Mother Waldron Park near Halekauwila Street/Cooke Street Intersection, looking 'Ewa:* Why is the straddle bent guideway with double columns only utilized along Halekauwila Street in Kakaako? Couldn't the on-street parking be eliminated on one (1) side so that the guideway columns could be placed down the centerline of the roadway? This straddle bent guideway is rather bulky especially for the abutting senior housing units (major visual impact).

21. *p. 4-85, Common to All Build Alternatives:* This section states that RTD will coordinate with the City to identify the particular needs of each view. The FEIS should expand upon this and identify which City Department(s) would be consulted and what the methodology would be to achieving this so that appropriate mitigative measures are identified.

22. *p. 4-86, Fort Weaver Road to Aloha Stadium Landscape Unit:* This section states that the West Loch station and respective transit center would blend well with the bulk and scale of the Waipahu Town Center's densely developed commercial character. This statement should be revised as the Waipahu Town Center is far from being densely developed, particularly with the large surface parking lot adjacent to Farrington Highway.

23. *p. 4-93, Mitigation:* Information on the particular needs of each view (as stated on page 4-85) needs to be added. The relocation of trees within the station area should also be added as a mitigative measure.

24. There should be more discussion about the visual impacts of the guideway between Kamakee Street and Ala Moana Center.

25. In Section 4.7, the mitigation measures should be expanded with more discussions on how to minimize the negative visual effects.

26. *p. 4-138, Mitigation:* A bullet should be added that states that the first priority for street trees transplanting should be within the station area or neighborhood from where they were originally planted. For example, the trees along Farrington

Highway in Waipahu, a source of community pride, should be transplanted within the West Loch or Waipahu Transit Center station areas or elsewhere within Waipahu. This should also be added to Table 4-1 under the section pertaining to visual and aesthetic conditions.

27. *p. 4-161:* Delete duplicate page.

28. *p. 4-166, Station Area Development:* This section states that the TOD Ordinance is expected to be enacted in 2008. The FEIS should update this information and state that the TOD Ordinance should be adopted in 2009.

29. *p. 4-166 and p. 4-167, 'Ewa Plain: East Kapolei, UH West O'ahu, and Ho'opili:* All references to the Hunt Development Group should be deleted since this organization is no longer working with the UH West O'ahu to develop the Private Development Lands.

30. *p. 4-176, Table 4-37 List of Anticipated Permits:* This section listing anticipated City permits and/or approvals is incomplete. Permits from DPP may include, but are not limited to building, grading, grubbing and stockpiling, trenching, dewatering, drain connection and subdivision. See attached table which is not a final list. The table also includes other permits and approvals that may be required from State and Federal agencies.

31. The project may be required to comply with Section II (Storm Water Quality) of DPP's "Rules Relating to Storm Drainage Standards".

32. Outside of specific areas, e.g., land under federal jurisdiction or the Kakaako District as designated in the Hawaii Revised Statutes, the Honolulu City Council is the authority for the granting of major permits within the special management area (SMA) as established by Chapter 25, Revised Ordinances of Honolulu (ROH). However, there is insufficient information in the EIS to determine which project sites and/or activities meeting the definition of development in ROH Section 25-1.3 would require a major (or minor) SMA use permit. Therefore, for portions of the project that are in or near the SMA boundary, the Final EIS should include an overlay of these project areas with SMA boundaries to determine if permits will be required. Please consult with the Land Use Permits Division of the Department of Planning and Permitting at 768-8013.

33. Park and ride, maintenance and power generation facilities located within the 100-year flood plain are subject to compliance with flood hazard requirements. In addition, the planning, design and construction of these facilities and the entire

transit system should also take into account the possibility/implications of at least a one (1) meter rise in sea level over the next 50-100 years due to climate change and global warming. Please consult with Dr. Chip Fletcher of the University of Hawai`i at 956-2582.

34. *p. 6-2:* Are park-and-ride facilities included in capital and O&M costs?

35. *p. 6-5, Figure 6-1:* The FEIS should provide an explanation for the bump in the graph at year 2027.

36. *p. 6-8, Figure 6-3:* The FEIS should explain the steep rise in transit subsidies at year 2018.

We look forward to receiving the Final EIS. Should you have any questions, please contact Matt Higashida of our staff at 768-8045.

DKT:js

Attachment

cc: Katherine Puana Kealoha, Esq., Director, Office of Environmental Quality Control
Ted Matley, Federal Transit Administration, Region IX
James T. Hayes, Parsons Brinckerhoff

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RAIL TRANSIT PROJECT
REQUIRED PERMITS FROM DPP
(working draft)

Permit	Division*/Branch	Contact Name/ phone # (768-)	Comments
Subdivision/Easements	SDD/Subdivision	Mario Siu-Li/8098	
Construction Plan Review Street Lights Traffic Signal	SDD/Subdivision	Mario Siu-Li/8098	Only for work in city r-o-w. One Time Review.
Flood Hazard Variance	SDD/Subdivision	Mario Siu-Li/8098	
Sewer Connection	SDD/Wastewater	Dennis Nishimura/8197	
Grading, Trenching, Grubbing and Stockpiling	SDD/Civil Engineering	Mel Takakura/8104	
Storm drain connection	SDD/CEB	Mel Takakura/8104	
Construction dewatering	SDD/CEB	Mel Takakura/8104	
Industrial Discharge Permit	SDD/Wastewater	Dennis Nishimura/8197	For any sump pits in elevators, or any non-domestic discharge
Building Permit Combustible & Flammable Liquid Tank Certificate of Occupancy	Building Division	Tim Hiu/8120	Only required for work outside of r-o-w. Use Third Party Review?
Relocation Permit	CSO	Art Challacombe/8117	If Applicable
LUO Waiver for public uses Structures in Yard Height Limit Signs Parking Floor Area	LUPD	Bob Bannister/8012	As applicable
Contractor temporary staging area/yard	LUPD	Bob Bannister/8012	DTS can self-regulate
Special Management Area	LUPD	Bob Bannister/8012	If applicable. Requires City Council approval
Special District (Hawaii Capitol, Chinatown)	LUPD	Bob Bannister/8012	
Public Infrastructure Map (PIM)	Planning/PPB	Randy Hara/8041	Already done
Unilateral Agreement (UA) Compliance	Planning/DPZC	Eugene Takahashi/8035	As applicable, checked as part of subdiv/BP review
Urban Design Plan Compliance	Planning/CPB	Bonnie Arakawa/8048	As applicable under UA, checked as part of subdiv/BP review

* LUPD Land Use Permits Division
SDD Site Development Division
BLDG Building Division
CSO Customer Service Office
CEB Civil Engineering Branch
PPB Policy Planning Branch
DPZD Development Plans & Zone Change Branch

P:\SpecialProjects\Transit\08 Permit Table-k.doc

OTHER PERMITS MISSING FROM FIRST DRAFT

Permit	Respn. Dept.	Comments
Right of Access	DLNR	For DLNR land in Kapolei
Stream Channel Alteration	DLNR	Any work in streams
??	Dept of Army	Any work in streams
401 Certification	DOH	Any work in streams
Street Usage	DTS	Any work within city road right-of-way, vehicular and pedestrian traffic
?		Alignment, stations in Kalaeloa and Kakaako

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DEPARTMENT OF TRANSPORTATION SERVICES

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT2/090-298955R

MEMORANDUM

TO: DAVID K. TANOUE, DIRECTOR
DEPARTMENT OF PLANNING & PERMITTING

FROM: WAYNE Y. YOSHIOKA, DIRECTOR

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

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1. *Property that will be directly affected by the Project will be purchased at market rates. As discussed in Section 4.4.3 of the Final EIS, "...compensation will be provided to affected property owners, businesses, or residents in compliance with all applicable Federal and State laws and will follow the Federal Uniform Relocation Assistance and Real Properly Acquisition Policies Act (49 CFR 24)."*

2. *Appendix B in the Draft EIS illustrated the tax map parcels (TMKs) that will be acquired by the City for the Project. Appendix B has been updated for the Final EIS and is now Appendix C.*

3. *The suggested revision regarding Kalaeloa Industrial Park has not been made in the Final EIS. The label for this figure has been changed to read "Kalaeloa."*

4. *The suggested revision regarding the East Kapolei Station has been made in the Final EIS (Figure 2-17).*

5. *The "walk" column in Table 3-18 in the Draft EIS represents both walking and bicycling trips to fixed guideway stations. The column heading has been modified in the Final EIS (Table 3-20) to reflect both modes of access.*

6. *The Project is designed to be one part of a multi-modal transportation system. Bicycles will be allowed on transit vehicles as regulated by a bicycle policy. Access to stations will be in the form of bus, walking, bicycling, drop-off, and in some cases park-and-ride. The bus system will be modified to complement the rail transit system, with additional feeder buses connecting surrounding communities to the stations. While the Project is coordinating with City and State agencies to encourage development of enhanced pedestrian and bicycle facilities near the stations, the actual construction of such facilities is beyond the scope of the Project.*

   As stated in Section 2.5.5 of the Final EIS, design criteria developed for Project stations place highest emphasis on walk and bicycle access. Pedestrian access to stations, including accessible routes, shall be given first priority for reasons of safety. The design criteria also state that, as a non-motorized mode, bicycles will be given second priority.

7. *Table 3-22 in the Final EIS shows estimated spillover parking demand at each station. As stated in Section 3.4.7 of the Final EIS, the approach to mitigating the effects of spillover parking will be unique to each station area. The City will conduct surveys to determine the extent of spillover parking near stations and implement one or more mitigation strategies as needed. Strategies to be used include, but are not limited to, parking restrictions (where parking causes safety or congestion problems) and shared parking arrangements (at locations where parking is available but dedicated to another purpose, such as retail centers, office uses, or places of worship). Implemented strategies will be monitored by the City, and necessary adjustments will be made as needed.*

8. *As future residential, commercial, and mixed-use development occurs around stations, both parking supply and demand could change over time and influence the extent of any spillover parking. The section analyzing potential spillover parking impacts has been left as it appeared in the Draft EIS, since it is describing potential conditions that could affect spillover parking demand and provides the best estimate of impacts based on the available information.*

9. *The Project is coordinating with City and State agencies to encourage development of enhanced pedestrian and bicycle facilities near the stations. The Oahu Bike Plan is currently being updated, and the final recommendations of the Bike Plan will come out after completion of the Project Final EIS. Section 3.4.5 has been revised to include the following language, "The Oahu Bike Plan is currently being updated and is scheduled to be adopted later in 2009. The Draft Master Plan includes a prioritized list of bicycle projects developed using criteria that include access to transit. Several projects that would connect existing or*

future bicycle facilities to rail transit stations are included in the Draft Master Plan."

Regarding use of the concourse/mezzanine level of stations by the general public, that decision has not been made. Some stations are being designed to accommodate such access, including potential pedestrian crossings. Whether that is allowed will depend on the fare policy that is implemented.

10. *The specific mitigation strategies and the schedule for implementation will be determined as the stations are opened. Parking surveys will be conducted prior to starting construction of a station, and again within six months after opening of the station. Results of the surveys will be used to determine the appropriate mitigation strategy, which will be selected by the City and implemented as soon as feasible. Follow-up surveys will be conducted by the City to determine if the mitigation strategies are effective. Additional mitigation measures will be implemented as needed, as determined by the City. Strategies to be used include, but are not limited to, parking restrictions (where parking is causing safety or congestion problems, and shared parking arrangements (at locations where parking is available but dedicated to another purpose, such as retail centers, office uses, or places of worship).*

11. *The Project has logical termini at East Kapolei and Ala Moana Center and independent utility from any extensions that may be constructed in the future. The future extensions to West Kapolei, Salt Lake Boulevard, Waikiki, and UH Manoa are discussed in the cumulative effects sections of Chapters 3 and 4 of the Final EIS. However, the future extensions are not part of this Project; thus, they are not required to be evaluated under Chapter 343 of the Hawaii Revised Statutes and NEPA. Under NEPA, environmental analysis is only required when there is a proposed action by a Federal agency. Here, because the future extensions are not proposed for implementation at this time, they are not part of the Project studied in the Final EIS. It would be premature to undertake an environmental analysis of the extensions (beyond the cumulative effects analysis) because they are not part of the proposed action to be taken by the City and FTA. If the extensions are proposed for implementation in the future, environmental analysis of the extensions and appropriate alternatives will be undertaken at that time.*

12. *High-density development is a component of transit-oriented development (TOD), to maximize transit ridership from adjacent mixed land uses. TOD principles incorporate context sensitivity into design for a given community. In response to your comment, Section 4.2.3 of the Final EIS has been revised to note that the Waipahu Town Plan (1995), Pearl Harbor Historic District Trail Master Plan (2001), and Kalihi-Palama Action Plan (2004) promote transit-supportive development patterns, pedestrian friendly environments, and an inter-modal transportation network.*

13. *Section 4.2.2 of the Final EIS summarizes the goals and objectives of relevant transportation and land use plans and Section 4.2.3 of the Final EIS states that the Project will be consistent with the adopted State and Local government transportation and land use plans and polices. Additional detail regarding the*

specific plans mentioned can be found in Chapter 2 of the Land Use Technical Report. This includes the Primary Urban Center Development Plan, Ewa Development Plan, Central Oahu Sustainable Communities Plan, and their transit corridor components, as shown on the Public Facilities Maps (see Section 2.1.4 to 2.1.6 of the Land Use Technical Report). The Project is consistent with relevant transportation and land use plans, including the Public Infrastructure Maps. The technical report is available on the Project website (www.honolulutransit.org).

14. *The DTS has developed specifications and design criteria to address the City and County of Honolulu's requirements for accessibility and safety and security of the system, which includes pedestrian facilities. In addition, all stations will conform to applicable Americans with Disabilities Act (ADA) and local regulations, and DTS will work with State and City agencies to encourage the development of safe pedestrian facilities near stations.*

15. *The Diamond Head and Punchbowl Special Districts will not be affected by the Project and Section 4.8 of the Final EIS has been revised accordingly. The overall objectives and design guidelines for the Hawaii Capital and Chinatown Districts will be addressed during the station design process. This process will focus on characteristics and preferences of the communities adjacent to stations during the next level of planning and design for the stations.*

16. *Alternative track profiles and configurations were examined during the alternatives screening and conceptual design processes. The following measures will be included with the Project to minimize negative visual effects and enhance the visual and aesthetic opportunities that it creates:*

    - *Develop and apply design guidelines that will establish a consistent design framework for the Project with consideration of local context.*
    - *Retain existing trees where practical and provide new vegetation.*
    - *Shield exterior lighting.*
    - *Coordinate the project design with the City's TOD program within the DPP.*

    DTS will consult with the communities surrounding each station for input on station design elements.

    Under the heading Design Principals and Mitigation in Section 4.8.3 of the Final EIS, specific environmental, architectural, and landscape design criteria are listed that will help minimize visual effects of the Project. Guideway materials and surface textures will be selected in accordance with generally accepted architectural principals to achieve effected integration between the guideway and its surrounding environment. Landscaping and streetscape improvements will help mitigate potential visual impacts.

17. *Mauka views from the Kakaako Waterfront Park toward Punchbowl and the Koolau Mountain Range will not be affected by the Project (see Section 4.8.3 Potential Visual Effects on Protected Views and Vistas-Kalihi to Ala Moana Center in the Final EIS). The middle ground of these panoramic views, where the*

Project will traverse, are dominated by other mid-rise to high-rise buildings. The panoramic and mauka-makai protected view corridors that are identified in the Primary Urban Center Development Plan and that will be affected by the Project are shown and discussed in Section 4.8 of the Final EIS.

18. *With respect to the Chinatown Station, the text in Section 4.5 of the Draft EIS has been revised in the Final EIS Section 4.6.3 to state that "Within the Downtown area, the Project will pass the historic districts of Chinatown and Merchant Street. Nimitz Highway is located along the perimeter of these two districts between the Downtown uses and Honolulu Harbor; therefore, the transit system will have little effect on their uses. However, it will contrast with their historic character." Mitigation measures for visual effects are discussed in Section 4.8.3 of the Final EIS and include retention of trees, where feasible, and shielding of exterior lighting along the guideway.*

    As stated in Section 4.8 of the Final EIS, the simulations are intended to represent the scale and spatial relationships of project elements to other objects. These simulations serve several purposes: they were used to evaluate visual and aesthetic consequences, demonstrate the potential for mitigation, and provide a means of communicating the findings of the analysis. The stations that were simulated for the visual assessment generally depict those that are expected to have a comparatively greater visual effect (see Section 4.8.3 for specific figures for the Chinatown Station and for the Downtown Station). For a typical station prototype, please refer to Section 2 of the Final EIS. The prototype shows a cross-section view that is intended to more accurately show the guideway dimensions. DTS has considered your request for additional station simulations. However, it was determined that the existing simulations presented in the Final EIS adequately represent the Project.

    The ongoing station design process is focusing on characteristics and preferences of the communities adjacent to each station.

    Panoramic views along the alignment are represented by photographs included in the Final EIS: see Section 4.8.3 for specific figures, Viewpoint 5—Aloha Stadium, looking Ewa; Viewpoint 7—Keehi Lagoon Beach Park, looking Koko Head; and, Viewpoint 8—Keehi Lagoon Beach Park, looking Mauka. The simulations included in Section 4.8 of the Final EIS are intended to represent the range of scale and spatial relationships of project elements to surrounding lands uses and structures. However, they do not reproduce the entire field of view that individuals would perceive. Photographs typically produce a static field of view, but an individual's eyes constantly scan and selectively focus on a scene for content. As a result, photographs often do not show scenic features as prominently as they might appear to individual observers. The visual effects of the Project on these views are presented in the tables in Section 4.8 of the Final EIS.

    The panoramic and mauka-makai protected view corridors that are identified in the Primary Urban Center Development Plan and will be affected by the Project are shown and discussed in Section 4.8 of the Final EIS.

19. *The clearance reference in the comments will be verified during final design. As stated in Section 4.18.2 of the Final EIS, communication and coordination have been initiated with the affected utility agencies and companies and will continue throughout design and construction. Utility rearrangements will occur as necessary to ensure that construction of the Project may proceed without affecting utility service.*

20. *Adjacent to the senior housing unit, there is an existing 14-foot-wide by 8.5-foot-high concrete box drainage culvert in Halekauwila Street that prevents placement of guideway columns down the middle of the roadway. Eliminating the parking on the makai side of the street would place part of the guideway in the park, which is a sensitive community resource. Parking could be eliminated along the mauka side of the road with the guideway placed inside the elderly housing property, but RTD felt the current design had fewer impacts to surrounding properties.*

    The potential visual effects at Viewpoint 19 are discussed in Section 4.8.3 of the Final EIS. It is noted that the bulk and scale of the guideway and columns will contrast substantially with the scale and character of Mother Waldron Neighborhood Park and the adjacent residential building. Mitigation measures for visual effects are discussed in Section 4.8.3 of the Final EIS, as noted above.

21. *The sentence has been revised in the Final EIS to state, "RTD will coordinate with DPP regarding the particular needs of each view."*

22. *To correct the description of the Waipahu Town Center, the words "densely developed" have been deleted in the Final EIS.*

23. *DTS will coordinate with DPP through meetings that will include review of design plans. The objective will be to identify the particular needs of each view; however, changes to some views will be unavoidable. Street trees along the project alignment are discussed in Section 4.15 of the Final EIS. Mitigation measures to minimize negative visual effects and enhance the visual and aesthetic opportunities that it creates are discussed in Section 4.8.3 of the Final EIS. As stated in the mitigation discussion, existing trees will be retained where practical, including at station areas.*

24. *Visual effects of the guideway between Kamakee Street and Ala Moana Center are discussed in Section 4.7.3 of the Draft EIS. The discussion notes that no visually sensitive resources are located in this area, which is primarily big-box stores and smaller industrial buildings. The discussion has been expanded in the Final EIS to indicate that buildings will be removed to allow the cross-over from Queen Street to Kona Street. Please refer to Section 4.8.3, including the table; Potential Visual Effects on Protected Views and Vistas-Kalihi to Ala Moana Center in the Final EIS, for a discussion of visual effects along the mauka-makai view corridor on Piikoi Street.*

25. *More specific mitigation measures to address visual impacts of the Project are being developed through the station design and planning process. The initial station area plans and design guidelines were first developed through a series of interactive workshops in 2008 involving input from DTS, DPP, and the project*

design team. The next level of transit station design is focusing on integrating individual neighborhood characteristics and preferences of the communities served by stations. The Project is hosting a series of public station design workshops where the community is involved in the design of the stations. The workshops provide multiple opportunities for brainstorming station ideas, giving feedback on preliminary concepts, and finally a chance to review and comment on detailed station designs.

26. *Transplanted trees should remain close to their original location whenever possible. Your comment makes both good ecological and economic sense as well as preserving the sense of pride a community has in its mature trees. This has been added to Table 4-1 and as a bullet under mitigation for impacts to Visual and Aesthetic Conditions. Please note that the mitigation listed in Section 4.8.3 of the Final EIS states that existing trees will be retained where practical and new vegetation will be provided. DTS will consider transplanting street trees within the same station area or neighborhood where they are removed if this is a viable option for the specific location.*

27. *The duplicate page has been removed.*

28. *Section 4.19.2 of the Final EIS has been revised to reflect the passage of Bill 10 (2008) by the City Council in March 2009, under Ordinance 09-4.*

29. *Section 4.18.2 of the Draft EIS has been revised in the Final EIS. The reference to Hunt Development Group has been deleted.*

30. *DTS staff has been working, and will continue to work with DPP staff, to identify, apply for, prepare, and obtain permits related to construction.*

31. *The project design team will comply with DPP's "Rules Relating to Stormwater Drainage Standards."*

32. *This permit has been identified on the List of as indicated in Section 4.21 of the Final EIS, a Special Management Area permit is being prepared to address this issue.*

33. *In Section 4.14.3 of the Final EIS, it states: As a linear feature, the guideway will cross several floodplains in Waipahu and Pearl Highlands. However, the Project will not cause significant floodplain encroachment as defined by USDOT Order 5650.2. The guideway and many stations will be elevated above the floodplain by piers, but some facilities, such as stairs, elevators and traction power substations will have to be built at ground level. These features could have minor effects on floodplains, depending on how and where they are placed within a floodplain see figures in this section. However, any such changes caused by the Project will be mitigated through design to comply with current floodzone regulations. There will be no notable adverse impacts on natural and beneficial floodplain values and there will be no impact to water levels in flood zones. As there will be no impacts on floodplain values, a Conditional Letter of Map Revision (CLOMR) will not be necessary. According to the comments received from the U.S. Environmental Protection Agency, the predicted global*

sea level rise by the end of the century (2090-2099) is between 7 and 23 inches. The minimum elevation for any project feature is 5 feet above sea level; therefore, a rise of up to 2 feet would not directly affect any project feature.

34. *Yes, the financial plans include estimated capital and ongoing operating and maintenance costs for the park-and-ride facilities.*

35. *The "bump" in Figure 6-1 of the Draft EIS at year 2027 recognizes there will be a need to increase capital expenditures to refurbish or replace certain elements of the system after a decade of service.*

36. *2018 is the beginning of service on the full 21-mile rail line with costs of about $45 million (2007 dollars) in subsidy in that year (in addition to any increased costs for TheBus and other transit system elements). This figure is not included in the Final EIS.*

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

WAYNE Y. YOSHIOKA

Enclosure

POLICE DEPARTMENT
CITY AND COUNTY OF HONOLULU
801 SOUTH BERETANIA STREET · HONOLULU, HAWAII 96813
TELEPHONE: (808) 529-3111 · INTERNET: www.honolulupd.org

27/2U5

MUFI HANNEMANN
MAYOR

BOISSE P. CORREA
CHIEF

CARL C. PELLAZO
CARL A. GOOSBY
DEPUTY CHIEFS

OUR REFERENCE BS-DK

December 9, 2008

RECEIVED
2008 DEC 11 P 2:41
OFFICE OF THE DIRECTOR
DEPARTMENT OF
TRANSPORTATION SERVICES

TO: WAYNE Y. YOSHIOKA, DIRECTOR
DEPARTMENT OF TRANSPORTATION SERVICES

FROM: BOISSE P. CORREA, CHIEF OF POLICE
HONOLULU POLICE DEPARTMENT

SUBJECT: DRAFT ENVIRONMENTAL IMPACT STATEMENT
SECTION 4 (F) EVALUATION
HONOLULU HIGH-CAPACITY TRANSIT CORRIDOR PROJECT

Thank you for the opportunity to review and comment on the subject project.

As stated in our previous memorandum to the City Department of Planning and Permitting (dated March 27, 2008), the Honolulu Police Department's involvement in the project is being addressed through the project's Safety and Security Management Plan.

If there are any questions, please call Mr. Brandon Stone of the Executive Bureau at 529-3644.

BOISSE P. CORREA
Chief of Police

By
DEBORA A. TANDAL
Assistant Chief of Police
Support Services Bureau

cc: OEQC
Mr. Ted Matley, FTA Region IX

Serving and Protecting With Aloha

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

May 21, 2010

RT12/08-291203R

MEMORANDUM

TO: LOUIS M. KEALOHA, CHIEF
HONOLULU POLICE DEPARTMENT

FROM: WAYNE Y. YOSHIOKA, DIRECTOR

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

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

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

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this

letter. Issuance of the Record of Decision under NEPA and acceptance of the Final EIS by the Governor of the State of Hawaii are the next anticipated actions and will conclude the environmental review process for this Project.

WAYNE Y. YOSHIOKA

Enclosure

Individuals, Groups, and Organizations

AR00001319

Status :	Initial Action Needed
Creation Date :	12/19/2008
Creator *Affiliation* :	
First Name :	deborah
Last Name :	agles
Business/Organization :	
Address :	
Alternative Preference :	
Apt./Suite No. :	
City :	
State :	HI
Zip Code :	96813
Email :	dagles@juno.com
Telephone :	
Telephone Extension :	
Add to Mailing List :	Email
Submission Method :	Website
Other Submission Method :	
Submission Date :	12/19/2008
Submission Content/Notes :	to make the rail a desirable service that will be utilized and truly alleviate the awful leeward traffic mess, I would recommend the following: *Minimal stops with feeder buses or trollys (5-10 stops instead of 20)*, it has to be time efficient and better than driving or it won't be used. It should extend from downtown Kapolei to UH, via the airport, not Salt Lake. Apprpriate stops would be Kapolei, east Kapolei at the Geiger Rd / Waipahu interchange, *Leeward college, Pearl Ridge, airport*, downtown, ala moana / waikiki, and UH Manoa. I would agree with Mr Dijou that pearl ridge - HNL be built first, that makes much more sense that in an underdeveloped area. Also, I would reconsider the steel wheels, they can be quite noisy, and with the rail traversing residental areas, best to be as quiet as possible. Thanks for the oppertunity to speak my mind.

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-332247

Ms. Deborah Agles
dagles@juno.com

Dear Ms. Agles:

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

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

The number of stations affects riders in two ways. If stations are too far apart, the system is not convenient as users must walk too far or drive a greater distance to access a station. If they are too near, the average travel speed is reduced. To balance these concerns, the average distance between stations is approximately one mile, with shorter distances in denser areas that have greater transit demand.

As shown in Table 3-15, there will be a significant improvement in transit speeds with the Project. As a result, major reductions in transit travel times will occur for several major markets, such as between developing areas in Ewa and Downtown. As shown in Figure 3-7 in the Final EIS, transit travel times will be better with the Project compared to No Build conditions.

As described in Section 2.5.10, Project Phasing, and further in Section 8.6.9, Construction Phasing, in the Final EIS, to support phased opening, the first construction phase must be connected to a maintenance and storage facility, which requires considerable space.

The first phase of the Project must be connected to the maintenance and storage facility because, in addition to maintenance of equipment and ongoing operations, the maintenance and storage facility houses the main control center for the entire Project, and the required testing and operation of the system could not be completed without access to it. No location has been identified closer to Downtown with sufficient available land to construct a maintenance and storage facility. Therefore, construction will begin between East Kapolei and Leeward Community College. The Project will be constructed in phases to accomplish the following:

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

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

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

The Project has logical termini at East Kapolei and Ala Moana Center and independent utility from any extensions that may be constructed in the future. The future extensions to West Kapolei, Salt Lake Boulevard, Waikiki, and UH Manoa are discussed in the cumulative impacts sections of Chapters 3 and 4 of the Final EIS. However, the future extensions are not part of this Project; thus, they are not required to be evaluated under Chapter 343 of the Hawaii Revised Statutes and NEPA. Under NEPA, environmental analysis is only required when there is a proposed action by a Federal agency. Here, because the future extensions are not proposed for implementation at this time, they are not part of the Project studied in the Final EIS. It would be premature to undertake an environmental analysis of the extensions (beyond the cumulative impacts analysis) because they are not part of the proposed action to be taken by the City and FTA. If the future extensions are proposed for implementation in the future, environmental analysis of the extensions and appropriate alternatives will be undertaken at that time. Bus connections will be enhanced from Ala Moana Center to UH Manoa.

As stated in Section 4.10.3 of the Final EIS, the Project will cause no severe noise impacts. Moderate impacts will occur at upper floors of a few high-rise buildings (as shown in

Table 4-18 in the Final EIS). With the recommended mitigation in place (sound absorbing material and wheel skirts), the noise analysis indicates that the new noise generated by the Project will be lower than the existing noise levels in most places.

The project design includes an integrated noise-blocking parapet wall at the edge of the guideway structure that extends 3 feet above the top of the rail. The parapet wall will substantially reduce ground-level noise.

Wheel skirts will increase the benefit from the parapet wall at locations above the elevation of the track. The use of sound-absorptive materials below the tracks in the areas that will experience moderate noise impacts will reduce the Project noise levels from the upper floors to below the impact level. Once the Project is operating, noise levels will be re-measured to confirm that there are no noise impacts from the Project.

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

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Status :	Initial Action Needed
Creation Date :	1/26/2009
Creator Affiliation :	
First Name :	Robert
Last Name :	Airhart
Business/Organization :	
Address :	46-074 Puulena St
Alternative Preference :	
Apt./Suite No. :	1115
City :	Kaneohe
State :	HI
Zip Code :	96744
Email :	airhartbn@hawaiiantel.net
Telephone :	
Telephone Extension :	
Add to Mailing List :	None
Submission Method :	Website
Other Submission Method :	
Submission Date :	01/26/2009
Submission Content/Notes :	Will the train and road bed be maintained the same as our roads have NOT BEEN in the past?? Scary

DEPARTMENT OF TRANSPORTATION SERVICES

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-334314

Mr. Robert Airhart
46-074 Puulena Street, #1115
Kaneohe, Hawaii 96744

Dear Mr. Airhart:

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

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

As detailed in Chapter 6 of the Final EIS, the Project includes ongoing operation and maintenance. Maintenance of the Project is very different from fixing roads. The maintenance plan has been developed following consultation with the FTA consistent with successful programs in other places.

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

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
Creation Date :	11/26/2008
Creator Affiliation :	
First Name :	Cree
Last Name :	Akana
Business/Organization :	Private
Address :	3515-A Kaimuki Ave
Alternative Preference :	
Apt./Suite No. :	
City :	Honolulu
State :	HI
Zip Code :	96816
Email :	cakana@honolulu.gov
Telephone :	366-4421
Telephone Extension :	
Add to Mailing List :	Email
Submission Method :	Website
Other Submission Method :	
Submission Date :	11/26/2008
Submission Content/Notes :	Not exactly sold on the "Rail" but because it has some what been desided that it will be coming, the airport route will serve a better cause. If us the "Tax payers" are going to pay for this project, the Airport route would be my prefered choice. Most cities in America have there rail system routed in or near the airport, and for reasons that need no explaination. My hope is that the City Council will make the right choice, and for the greater good of our Island, and not for political reasons. On a side note this rail project in my personal opinion will not relieve traffic like its proposed to do. All it does is leaves behind someones legacy, and adds to ones resume saying that "when I was mayor I started the rail in Hawaii". But leaves behind the on going "Bill" that we will have to pay forever. Suggested thoughts: Fix and correct our backwards freeways. Open up our traffic choke points Middle St. merge Halawa / Stadium merge H-2 merge. Correct on & off ramps to create traffic flow, ETC. Mahalo

DEPARTMENT OF TRANSPORTATION SERVICES

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-330917

Mr. Cree Akana
3515-A Kaimuki Avenue
Honolulu, Hawaii 96816

Dear Mr. Akana:

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

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

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

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

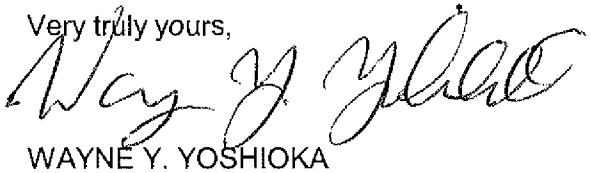
To answer your comment regarding traffic effects from the Project, analysis of traffic impacts employs a Travel Demand Forecasting Model used by the Oahu Metropolitan Planning Organization. The approach has proven to be effective in estimating traffic impacts in other cities. This model is based on guidelines established by the FTA.

Information about the future performance of the highway system on Oahu with or without the Project is included in Chapter 3 of the Final EIS. Traffic conditions will be worse in 2030 under any circumstance and regardless of which solution is applied. The Alternatives Analysis Report stated this. The key point is that rail will improve conditions compared to what they would be if the Project were not built. With the fixed guideway system, total islandwide congestion (as measured by vehicle hours of delay) will decrease by 18 percent, compared to the No Build Alternative (as shown in Table 3-14 in the Final EIS). Accordingly, traffic conditions will be substantially better with the Project than any of the other potential solutions studied.

In addition to the fixed guideway, there are approximately $3 billion in proposed transportation improvements included in the Oahu Regional Transportation Plan. These include widening the H-1 Freeway and other facilities at key choke points, adding a westbound zipper lane, and other substantial transportation projects. A list of these projects can be found in Table 2-4 of the Final EIS. The traffic assessment conducted for the Draft and Final EISs included these projects under the No Build and Build Alternatives.

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

Very truly yours,



WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
Creation Date :	12/8/2008
Creator Affiliation :	
First Name :	Moses
Last Name :	Akana
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Add to Mailing List :	Both
Submission Method :	Website
Other Submission Method :	
Submission Date :	12/08/2008
Submission Content/Notes :	Despite what's been in the news about what to build first, neither the Kapolei-Waipahu link nor the Pear City-downtown link will draw much ridership. For Kapolei-Waipahu, it makes no sense for someone working downtown to ride the rail to Waipahu and get off. Likewise, people in Pearl City probably won't ride it because they live on the Honolulu side of the H1/H2 merge, the bottleneck that causes grief for west and central Oahu commuters. The initial link should be built from Waipahu to downtown. Provide enough parking at the Waipahu station for commuters to leave their cars (like what the had at Village Park).

DEPARTMENT OF TRANSPORTATION SERVICES

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-331311

Mr. Moses Akana
98-1693 Kaahumanu Street, 24C
Aiea, Hawaii 96701

Dear Mr. Akana:

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

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

As described in Section 2.5.10, Project Phasing, and further in Section 8.6.9, Construction Phasing, in the Final EIS, to support phased opening, the first construction phase must be connected to a maintenance and storage facility, which requires considerable space. The first phase of the Project must be connected to the maintenance and storage facility because, in addition to maintenance of equipment and ongoing operations, the maintenance and storage facility houses the main control center for the entire Project and the required testing and operation of the system could not be completed without access to it. No location has been identified closer to Downtown with sufficient available land to construct a maintenance and storage facility. Therefore, construction will begin between East Kapolei and Leeward Community College. The Project will be constructed in phases to accomplish the following:

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

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

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

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

As also discussed in Chapter 2 of the Final EIS, park-and-ride facilities are planned at East Kapolei, UH West Oahu, Pearl Highlands, and Aloha Stadium. These stations have been identified as having the highest demand for drive-to-transit access. Table 2-8 in the Final EIS shows the size and capacity of each park-and-ride facility. The East Kapolei facility will provide 900 parking spaces, and the Pearl Highlands facility will provide 1,600 spaces.

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

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
Creation Date :	12/25/2008
Creator Affiliation :	
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Email :	alarcon@hawaiiantel.net
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Telephone Extension :	
Add to Mailing List :	Email
Submission Method :	Website
Other Submission Method :	
Submission Date :	12/25/2008

Submission Content/Notes : I voted no on the Primary Election for a rail system. Because of the money spend on the the type of system and the route. The beauty of the Island is also at stake. Yes we do have a traffic problem on the Island but the rail system the "Mayor" wants so bad it not what this island needs and not the answer. Viaduct like on the airport/nimitz is more close in certain areas, to solve the traffic problem. The people here on the island won't give up their cars, therefore, building such a hugh concrete blocks on the island will be worthless it will not help the traffic problem. I recently went to Los Angeles and I viewed their rail route in China town, the rail is on concrete blocks and looks awful going by a residential apartment area. "I do not want" such an awful looking piece of concrete going by my apartment building, if build it will go right by bedroom in Salt Lake. From what I heard on the Public Hearing on December 9, in Salt Lake there would be stations at the Stadium and Salt Lake Shopping Center. That is a joke, where are going all those people from Salt Lake park their cars there is not enough spaces for all the people with their cars in Salt Lake it is a dense populate residential area. The ones who do not have cars, do you think they will walk all the way down to the rail station, no they are not, they will take the closest bus available and not the rail. This is a hasty way of doing business, as previously said the island has a traffic problem, however, the present wanted system by the Mayor is not "it". The federal government will give money for any project "they would have the last time" now and thereafter. Please come up with friendlier riding system for the public, so the public will be able to use it and it will not destroy the beauty of this island. People where able to vote on the rail project, even though they are never able to use and affected by this rail system.

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-332256

Ms. Renate Alarcon
3020 Ala Napuaa Street
Apartment 401
Honolulu, Hawaii 96818

Dear Ms. Alarcon:

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

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

Your opposition to the Project is noted.

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

The screening process is documented in the Honolulu High-Capacity Transit Corridor Project Alternatives Screening Memorandum (DTS 2006a). Three scoping meetings were held during the screening process in December 2005, which included a presentation of initial

alternatives to the public, interested agencies, and officials to receive comments on the Purpose and Need, alternatives, and scope of the Alternatives Analysis. Refinements were made to the alternatives based on the public input during scoping.

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

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

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

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

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

- *Develop and apply design guidelines that will establish a consistent design framework for the Project with consideration of local context.*
- *Coordinate the project design with City TOD planning and DPP.*
- *Consult with the communities surrounding each station for input on station design elements.*
- *Consider specific sites for landscaping and trees during the final design phase when plans for new plantings will be prepared by a landscape architect. Landscape and streetscape improvements will serve to mitigate potential visual impacts.*

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

As stated previously, during 2005 and 2006, the City and County of Honolulu conducted an alternatives screening process during which a wide variety of alternatives were examined. Remaining modal (for auto, transit), technology, and alignment options were combined to create alternatives that were evaluated in the Alternatives Analysis Report *(2006a). A Managed Lane Alternative (such as a viaduct) was examined as one of the alternatives. While this alternative would have slightly reduced congestion on parallel highways, systemwide traffic congestion would have been similar to the No Build Alternative. This congestion would result from increased traffic on arterials trying to access the facility. Total islandwide vehicle hours of delay would have increased slightly with the Managed Lane Reversible Option compared to the No Build Alternative, indicating a slight increase in systemwide congestion. Transit reliability would not have been improved except for express bus service operating in the managed lanes. The cost per hour of transit time savings was determined to be approximately four times greater than that for the Fixed Guideway Transit Alternative. The Managed Lane Alternative would not have substantially improved service or access to transit for transit-dependent communities. Because of these findings, this alternative was eliminated when the City and County of Honolulu Council selected a fixed guideway transit system extending from Kapolei to UH Manoa with a connection to Waikiki as the Locally Preferred Alternative.*

The Project has logical termini at East Kapolei and Ala Moana Center and independent utility from any extensions that may be constructed in the future. The future extensions to West Kapolei, Salt Lake Boulevard, Waikiki, and UH Manoa are discussed in the cumulative impacts sections of Chapters 3 and 4 of the Final EIS. However, the future extensions are not part of this Project, thus they are not required to be evaluated under Chapter 343 of the Hawaii Revised Statutes and NEPA. Under NEPA, environmental analysis is only required when there is a proposed action by a Federal agency. Here, because the future extensions are not proposed for implementation at this time, they are not part of the Project studied in the Final EIS. It would be premature to undertake an environmental analysis of the extensions (beyond the cumulative impacts analysis) because they are not part of the proposed action to be taken by the City and FTA. If the future extensions are proposed for implementation in the future, environmental analysis of the extensions and appropriate alternatives will be undertaken at that time. Bus service between Ala Moana Center and these destinations will be enhanced until those extensions are built.

Ridership projections for the forecast year of 2030 were developed using the travel demand model, which was calibrated against collected traffic and transit ridership information and then validated against current counts to be sure it properly represents travel activity in the transportation system (Section 3.2.1 of the Final EIS). An on-board transit survey was completed in December 2005 and January 2006, and the latest socioeconomic information available as of October 2008 was incorporated. Traffic counts were collected in 2005, 2007, and 2008. The model is based upon a set of realistic input assumptions regarding land use and demographic changes between now and 2030 and expected transportation levels-of-service on both the highway and public transit system. Based upon the model and these key input

assumptions, approximately 116,000 trips per day are expected on the rapid transit system on an average weekday in 2030.

Residents will have several methods available to access the fixed guideway system. Park-and-ride lots will be available at several stations, including Aloha Stadium. The bus system will be enhanced and modified to coordinate with the fixed guideway system. The existing and future bus system, including route numbers and frequency, are provided in Appendix D of the Final EIS. Because of the high frequency of the fixed guideway service (every three minutes during peak periods and every six minutes during mid-day periods), riders transferring from buses to the fixed guideway will experience minimal wait times. Riders transferring from the guideway service to buses will benefit from improved frequencies on existing bus routes serving stations. In addition, bicycle parking will be available at all stations and offer an option where it is too far to walk.

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

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

AIA

December 8, 2008

Mr. Ted Matley
FTA Region IX
201 Mission Street, Suite 1650
San Francisco, CA 94105

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

Dear Messrs. Matley and Yoshioka:

The Honolulu Chapter of the American Institute of Architects (AIA Honolulu) strongly supports the concept and implementation of a fixed guideway steel-on-steel rail system as an integral part of the future plans to meet the needs our growing island communities. We therefore offer the following comments and recommendations to assist the City in strengthening community support, enhancing our neighborhoods and environment, investing taxpayer money wisely, and ensuring Federal funding for the project.

Review of Project Goals and Objectives

A recent study by AIA National and the Center for Transportation Studies found that ***"the success of transportation projects requires integrating transportation design with social, economic, and cultural resources. The time for looking at transportation projects through the single lens of mobility, or even simple access and connectivity, is long gone."***[i] However, Chapter 1 of the Draft EIS outlines project goals and objectives that are focused almost exclusively on mobility concerns.

AIA Honolulu therefore recommends that the current project goals should be expanded and integrated with stronger community-planning objectives. We encourage the use of social, environmental, and aesthetic criteria – as well as economic efficiency – in the planning and design of transit system routes and supporting facilities. Transit system routes and facilities should further support land use objectives – including urban growth management and efficient transit mode linkages – and respect significant human, cultural and natural environments as defined by the City's Primary Urban Center Development Plan.

Other cities such as Portland, Salt Lake, and Sacramento have wisely integrated transportation, social, economic, and cultural objectives during the EIS process and as a result have built popular rail transit systems which not only transport people efficiently but also create desirable, livable communities. This emphasis on the bigger picture can best be summed up by the transit-planning protocol followed by Portland since the 1970's: ***"We define what kind of place we want to be and then identify the appropriate transportation options to serve it."***[ii]

Likewise, it is our understanding that the Federal Transportation Administration's evaluation criteria for New Starts funding goes well beyond measuring mobility improvements. According to its *New Starts and Small Starts Evaluation and Rating Process*, proposed projects are graded against the full range of the following justification criteria[iii]:

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- ***Transit Supportive Land Use Policies and Future Patterns***
- ***Environmental Benefits***
- ***Cost Effectiveness***
- ***Mobility Improvements***
- ***Operating Efficiencies***

We similarly recommend that the Honolulu Rail Transit project goals and objectives be amended to align closely with these key criteria in order to ensure qualification for Federal funding.

Additionally, because our island economy remains heavily dependent upon tourism, we feel it essential that the project objectives should address minimizing economic impact to the visitor industry and to our island's visual appeal. For instance, views from cruise ships and visitors' visual expectations of Hawaii, Honolulu, and Waikiki should be considered.

Review of Project Impacts

AIA Honolulu has also carefully reviewed the Draft EIS in relation to our chapter's public policies on transportation. We respectfully offer the following comments regarding the impacts an elevated guideway will have to our communities.

The City and County of Honolulu's Primary Urban Center Development Plan (PUC) is a comprehensive planning document mandated by the City's Charter to guide "the development and improvement of the City" into the year 2025.[iv] The PUC clearly defines guidelines to ***"preserve and enhance significant mauka or makai view corridors along major collector streets."***[v] Unfortunately, the proposed elevated rail structure will block mauka and makai view corridors particularly along Nimitz Highway through historic Chinatown and Downtown. Although the PUC provides criteria for protecting mauka *views from the Ala Wai promenade*[vi], the Draft EIS does not address visual impacts along the planned elevated segment serving the University of Hawaii at Manoa.

In addition, the PUC notes ***"as demonstrated in leading cities throughout the world, recapturing visual and physical access to the urban waterfront can stimulate economic renewal and be a source of civic pride."***[vii] Examples of popular waterfront destinations that have removed their elevated transportation structures include San Francisco, Boston, Seattle, and Sydney. The PUC goes on to stress that a major impediment for Honolulu is Nimitz highway that ***"effectively acts as a physical and visual barrier cutting off the waterfront from mauka pedestrian travel."***[viii] Elevated rail stations and structures along the waterfront will make a poor situation worse by introducing an additional physical and visual barrier. This will largely undo the tremendous past efforts by the State Department of Transportation to reintegrate the Aloha Tower with the rest of Downtown Honolulu.

AIA Honolulu also promotes the preservation and enhancement of historic and cultural districts such as Chinatown and the Hawaii Capital District. Our understanding is that the elevated Chinatown station and guideway structures would be approximately 40-50 feet above grade.[ix] We therefore respectfully disagree with the finding that the elevated system will pose "no adverse effect" to our historic districts[x] particularly when the Draft

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EIS states that ***"the project elements would contrast substantially with Chinatown's historic character"***[xi] and that through the Downtown area ***"the bulk and scale of the guideway would contrast with the more pedestrian scale [and] character of the streetscape."***[xii]

We are deeply concerned that despite documenting many of the significant visual and aesthetic impacts of the elevated guideway, the Draft EIS fails to propose mitigation measures to effectively counteract negative impacts on views, connection with the waterfront, historic districts, and pedestrian streetscapes. AIA Honolulu also recommends that rather than providing selective, localized views of the transit guideway and stations, broader visualization studies should also be performed. Panoramic mountain and waterfront views as defined by the PUC should be shown, keeping in mind the potential economic impact upon our tourist industry.

The AIA further advocates the creation of safe, healthy, and easily accessible environments for transit passengers as well as pedestrians and residents along the transit route. We are concerned that the areas below elevated rail structures and stations will become blighted, "nuisance" environments and that the lack of natural public sightlines into stations will diminish safety and security for passengers waiting on platforms. The proposed elevated platforms and concourses will also impede convenient access for both able-bodied and disabled users.

Finally, the AIA promotes sustainable planning, design, and operation of transit systems. Economic efficiency is also essential. The Draft EIS notes that it will take over 7 times the energy to construct an elevated guideway compared with an at-grade system.[xiii] We wish to also emphasize that an elevated guideway will require substantially greater amounts of materials, construction, and time in comparison with at-grade systems. Similarly, elevated systems require increased electrical consumption to power elevators, escalators, and additional lighting. Increased and ongoing operating and maintenance costs for public restrooms, painting, graffiti mitigation, and landscaping should also be accounted for in life cycle cost estimates. AIA Honolulu therefore considers an elevated system to be the least sustainable and cost effective option available to our communities.

Recommendations

For these reasons, AIA Honolulu urges the City to consider a more flexible rail transit solution capable of running at, below, or above grade to accommodate the particular conditions within each community. Third rail technology should not be our only option. Widely used alternatives such as overhead lines would allow much greater flexibility and would more effectively accommodate social, economic, cultural, and community planning objectives. Flexible transit solutions would also more easily satisfy the FTA's funding justification criteria for:

- Transit Supportive Land Use Policies and Future Patterns
- Environmental Benefits
- Cost Effectiveness
- Mobility Improvements
- Operating Efficiencies

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Impacts to our visual, historic, and cultural resources would be mitigated. There would be fewer detrimental consequences for our tourist industry. More of the cultural indigenous character of our communities, neighborhoods, and pedestrian streetscapes would be preserved or even enhanced. Sustainable objectives would be more easily achieved with lower requirements for energy, material, construction, time, and cost. In comparison with elevated systems, at grade systems would require less taxpayer funding and offer greater flexibility and affordability in planning for future extensions.

AIA Honolulu sincerely thanks the City and County of Honolulu for this opportunity to offer our comments and recommendations publicly. We have enjoyed greater dialogue with the City on transit issues in recent months and we reaffirm our willingness to work together with the Mayor, his administration, its consultants, and the City Council on developing viable and effective regional community planning and urban design solutions for this historic project, including the possibility of alternative mass transit corridors.

Sincerely Yours,

Sidney C.K. Char, AIA
President AIA Honolulu

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[i] Moving Communities Forward, p. 44
[ii] Community Building Sourcebook, Land Use and Transportation Initiatives in Portland Oregon, p. 1-4
[iii] FY2009 New Starts and Small Starts Evaluation and Rating Process, p. 3
[iv] Primary Urban Center Development Plan (PUC), p. 1-1
[v] PUC, p. 3-12
[vi] PUC, p. 3-4, 3-5
[vii] PUC, p. 3-38
[viii] PUC, p. 3-39
[ix] Draft EIS, p. 2-24
[x] Draft EIS, Table 5-2, p. 5-7
[xi] Draft EIS, p. 4-77
[xii] Draft EIS, p. 4-82
[xiii] Draft EIS, p. 4-159

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DEPARTMENT OF TRANSPORTATION SERVICES

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MUFI HANNEMANN
MAYOR

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DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

KENNETH TORU HAMAYASU
DEPUTY DIRECTOR

June 11, 2010

RT10/09-336955

Mr. Sidney C.L. Char
American Institute of Architects
119 Merchant Street, Suite 402
Honolulu, Hawaii 96813-4452

Dear Mr. Char:

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

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

Project Goals and Objectives—*Comments on the Project's Purpose and Need, and associated goals and objectives, were sought during the NEPA scoping period in March and April of 2007. The Project is a transportation project and includes the goal of supporting already planned development. The Project also supports the goals of the Honolulu General Plan and the Oahu Regional Transportation Plan by serving areas designated for urban growth. The social, environmental, aesthetic, and economic elements listed in the comment were evaluated in Chapter 4 of the Draft and Final EISs. Separately, the Department of Planning and Permitting (DPP) has developed a Transit Oriented Development Revised Ordinance of Honolulu (ROH 09-4) that will consider the Project in future land use planning.*

The following Project goals are shown in Table 1-4 of the Final EIS:

- *Improve corridor mobility.*

- *Improve corridor travel reliability.*
- *Improve access to planned development to support City policy to develop a second urban center.*
- *Improve transportation equity.*

In addition to the stated goals of the Project, the FTA evaluation will require the Project to address the five elements mentioned in the comment as part of the New Starts funding program. Those are also addressed in the Final EIS as part of the Evaluation of the Project in Chapter 7.

As stated in Section 4.2.3 of the Final EIS, the Project is consistent with the transportation and land use elements of adopted State and Local government plans. Cost-effectiveness is discussed in Section 7.4 of the Final EIS. As shown in Table 3-11 in Chapter 3 of the Final EIS, visitors will make up 11 percent of total daily travel in 2030. Given the importance of this market segment and potential environmental effects, visitors were recognized in the assessment of total travel demand. In addition, the identification of the Airport Alternative as the preferred alternative will allow visitors access to the high-capacity transit system for travel to or from the airport terminal.

***Visual Impacts**—The island's unique visual character and scenic beauty was considered in the visual and aesthetic assessment presented in the Draft and Final EISs. It is acknowledged that views in Downtown and other areas will be blocked and some views will change substantially, resulting in significant visual effects. View changes are not likely to be obtrusive in wider vistas or regional panoramic mountain and waterfront views, such as from cruise ships, where the project elements serve as smaller components of the larger landscape.*

As stated previously, the island's visual character and scenic beauty was considered in the visual and aesthetic assessment presented in the Draft and Final EISs. It is acknowledged that the guideway and stations will noticeably contrast with Chinatown's historic character. In addition, views in Downtown and the other areas, including protected mauka-makai views, will be blocked and some views will change substantially, resulting in significant visual effects. Protected views and vistas are identified in policy documents that govern the project corridor. These policy documents include the following: Ewa Development Plan, Central Oahu Sustainable Communities Plan, and Primary Urban Center Development Plan. The protected views and vistas are identified in Figures 4-17 to 4-19 of the Final EIS. Viewer group responses on the Draft EIS resulted in the refinement of the visual impact rating for several key views described in Section 4.8 of the Final EIS. Several additional simulations and summary tables were added to illustrate project effects discussed in the Draft EIS including protected mauka-makai views (see Tables 4-9 through 4-14 and Figures 4-39 through 4-50). Views along major collector streets are included and described in Table 4-9. The assessment summarized in Table 4-9 acknowledges that some view obstructions and changes to views will be unavoidable and substantial. They will be most noticeable where the guideway and stations are nearby or in the foreground of views. This includes those who travel near the alignment. The degree of visual effect will vary with the alignment orientation, guideway and station height, and height of surrounding buildings and trees, along with the viewer's expectations of view quality. View changes are not likely to be obtrusive in wider vistas or regional panoramic views where the project elements serve as smaller components of the larger landscape as noted in Section 4.8

of the Final EIS. Sections 4.8.2 and 4.8.3 of the Final EIS discusses existing development along the project alignment. As noted in this section much of the project alignment is located within a predominantly urban area with dense development.

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

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

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

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

- *Develop and apply design guidelines that will establish a consistent design framework for the Project with consideration of local context.*
- *Coordinate the project design with City TOD planning and DPP.*
- *Consult with the communities surrounding each station for input on station design elements.*
- *Consider specific sites for landscaping and trees during the final design phase when plans for new plantings will be prepared by a landscape architect. Landscape and streetscape improvements will serve to mitigate potential visual impacts.*

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

The Project has logical termini at East Kapolei and Ala Moana Center and independent utility from any extensions that may be constructed in the future. The future extensions to West Kapolei, Salt Lake Boulevard, Waikiki, and UH Manoa are discussed in the cumulative impacts sections of Chapters 3 and 4 of the Final EIS. However, the future extensions are not part of this Project; thus, they are not required to be evaluated under Chapter 343 of the Hawaii Revised Statutes and NEPA. Under NEPA, environmental analysis is only required when there is a proposed action by a Federal agency. Here, because the future extensions are not

proposed for implementation at this time, they are not part of the Project studied in the Final EIS. It would be premature to undertake an environmental analysis of the extensions (beyond the cumulative impacts analysis) because they are not part of the proposed action to be taken by the City and FTA. If the future extensions are proposed for implementation, environmental analysis of the extensions and appropriate alternatives will be undertaken at that time. As seen in Table 4-13 the panoramic views from the Ala Wai Canal Promenade toward the Koolau Mountain Range are Koko Head of study area and will have no visual effect.

The Chinatown Station and guideway will be dominant features in views along Nimitz Highway and mauka views of the Koolau Mountain Range will be blocked. The visual effects of the Project in Chinatown and through the downtown are listed in Table 4-9 and illustrated in Figures 4-30, 4-31, and 4-33 of the Final EIS. As stated above, Section 4.8.3 includes more detail on measures to minimize visual effect of the Project. The design criteria for the guideway and stations are presented in Section 4.8.3 of the Final EIS. One of the design criteria is to consider the historic and community context during design to reinforce the uniqueness of context or use.

Based on concerns raised by Section 106 consulting parties, preliminary effects determinations as shown in the Draft EIS were reevaluated and documented in the Honolulu High-Capacity Transit Corridor Project Historic Effects Report dated April 14, 2009. Both direct and indirect effects to historic properties were reevaluated in this report. The Project was determined to have an adverse effect to the Chinatown Historic District and no adverse effect to the Hawaii Capital Historic District. Following consultation, the State Historic Preservation Division (SHPD) concurred with the effect determinations on the Chinatown Historic District and the Hawaii Capital Historic District. These determinations of effect and the SHPD's concurrence are documented in Section 4.16 and Appendix H of the Final EIS.

Protected views and vistas that are identified in the Primary Urban Center Development Plan and may be affected by the Project are shown in Table 4-13 of the Final EIS and locations are identified on Figure 4-19.

***Station Design**—DTS has developed design criteria to address the City's visual and aesthetic requirements for the Project, which will be implemented in Final Design as mitigation measures to minimize visual effects, such as those discussed previously in this letter. Guideway materials and surface textures will be selected in accordance with generally accepted architectural principles to integrate the guideway with its surrounding environment. Landscaping and streetscape improvements will mitigate potential visual impacts. Under the heading Design Principals and Mitigation of Section 4.8.3 of the Final EIS, specific environmental, architectural, and landscape design criteria are listed that will help minimize negative visual effects of the Project.*

In addition, the ongoing station area planning process involves numerous aspects of transit system design. The process addresses design and planning issues in an integrated manner and focuses on the characteristics and preferences of the communities adjacent to each station.

***Safety and Security**—The majority of the rail system will travel in roadway medians. The areas below the guideway will continue to carry automobile traffic. The portions of stations*

at ground level are access buildings similar to other public areas, and will include access stairways, escalators and elevator banks with the possibility of space for small commercial uses. Elevated station platforms will have open views to the surrounding communities. All stations, park-and-ride facilities, and vehicles will include security cameras that are monitored at all times of operation, audible and visual messaging systems, and an intercom link to the system operations center. Security personnel will also patrol the system. Interior and safety lighting will be provided at all stations and park-and-ride facilities.

As discussed in the Final EIS Section 2.5.4 a project-specific Safety and Security Management Plan has been developed in accordance with FTA requirements to define the safety and security activities and methods for identifying, evaluating, and resolving potential safety hazards and security vulnerabilities of the system. It establishes responsibility and accountability for safety and security during the Preliminary Engineering, Final Design, construction, testing, and start-up phases of the Project. The Honolulu Police Department, the Honolulu Fire Department, the Honolulu Department of Emergency Management, and the Honolulu Emergency Services Department have been involved in preparing and will be part of implementing the plan. The plan addresses public safety and security concerns, including threats and hazards associated with the Project, specific issues that were identified through community outreach efforts, and design and architectural details to enhance safety.

The transit system will comply with Americans with Disabilities Act (ADA) requirements. Elevators and escalators will be provided at all stations. Also, level boarding will be provided to trains; therefore, stairs or lifts, as used on buses, will not be required.

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

The Alternatives Screening Memorandum (DTS 2006a) recognized the visually sensitive areas in Kakaako and Downtown Honolulu, including the Chinatown, Hawaii Capital, and Thomas Square/Honolulu Academy of Arts Special District. To minimize impacts on historic resources, visual aesthetics, and surface traffic, the screening process considered 15 combinations of tunnel, at-grade, or elevated alignments between Iwilei and Ward Avenue. Five different alignments through Downtown Honolulu were advanced for further analysis in the Alternatives Analysis, including an at-grade portion along Hotel Street, a tunnel under King Street, and elevated guideways along Nimitz Highway and Queen Street (Figure 2-4).

The Alternatives Analysis Report (DTS 2006b) evaluated the alignment alternatives based on transportation and overall benefits, environmental and social impacts, and cost considerations. The report found that an at-grade alignment along Hotel Street would require the acquisition of more parcels and could potentially affect more burial sites than any of the other alternatives considered. The alignment with at-grade operation Downtown and a tunnel under King Street, was not selected because of the environmental effects, such as impacts to cultural resources, reduction of street capacity, and property acquisition requirements of the at-grade and tunnel sections, which would cost an additional $300 million.

The Project's purpose is "to provide high-capacity rapid transit" in the congested east-west travel corridor (see Section 1.7 of the Final EIS). The need for the Project includes improving corridor transit mobility and reliability. The at-grade alignment would not meet the Project's Purpose and Need because it could not satisfy the mobility and reliability objectives of the Project (see bullets below). Some of the technical considerations associated with an at-grade versus elevated alignment through Downtown Honolulu include the following:

- ***System Capacity, Speed, and Reliability***—*The short, 200-foot (or less) blocks in Downtown Honolulu would permanently limit the system to two-car trains to prevent stopped trains from blocking vehicular traffic on cross-streets. Under ideal operational circumstances, the capacity of an at-grade system could reach 4,000 passengers per hour per direction, assuming optimistic five minute headways. Based on travel forecasts, the Project should support approximately 8,000 passengers in the peak hour by 2030. Moreover, the Project can be readily expanded to carry over 25,000 in each direction by reducing the interval between trains (headway) to 90 seconds during the peak period. To reach a comparable system capacity, speed, and reliability, an at-grade alignment would require a fenced, segregated right-of-way that would eliminate all obstacles to the train's passage, such as vehicular, pedestrian, or bicycle crossings. Even with transit signal priority, the at-grade speeds would be slower and less reliable than an elevated guideway. An at-grade system would travel at slower speeds due to the shorter blocks, tight and short radius curves in places within the constrained and congested Downtown street network, the need to obey traffic regulations (e.g., traffic signals), and potential conflicts with other at-grade activity, including cars, bicyclists, and pedestrians. These effects mean longer travel times and far less reliability than a fully grade-separated system. None of these factors affects an elevated rail system. The elevated rail can travel at its own speed any time of the day regardless of weather, traffic, or the need to let cross traffic proceed at intersections.*

- ***Mixed-Traffic Conflicts***— *The Project will run at three minute headways. However, three-minute headways with an at-grade system would prevent effective coordination of traffic signals in the delicately balanced signal network in downtown Honolulu. A disruption of traffic signal cycle coordination every three minutes would severely affect traffic flow and capacity of cross-streets. Furthermore, there would be no option to increase the capacity of the at-grade rail system by reducing the headway to 90 seconds, which would only exacerbate the signalization problem. An at-grade system would require removal of two or more existing traffic lanes on affected streets. This effect is significant and would exacerbate congestion. Congestion would not be isolated to the streets that cross the at-grade alignment but, instead, would spread throughout Downtown. The Final EIS shows that the Project's impact on traffic will be isolated and minimal with the elevated rail, and, in fact will reduce system-wide traffic delay by 18 percent compared to the No Build Alternative (Table 3-14 in the Final EIS). The elevated guideway will require no removal of existing through travel lanes, while providing a reliable travel alternative. When traffic slows, or even stops due to congestion or incidents, the elevated rail transit will continue to operate without delay or interruption.*

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

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

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

Cost Effectiveness—*The resources and costs associated with construction and operation on a lifecycle scale of an elevated system have been considered in project planning. The cost effectiveness of the Project is presented in Section 7.4 of the Final EIS. The comparison of cost effectiveness of the various alternatives considered is presented in the Alternatives Analysis Report (DTS 2006b) and summarized in Section 2.2.2 of the Final EIS. Tables 2-2 and 2-3 summarize the results of the Alternatives Analysis phase, including costs and environmental effects. As stated in Section 2.2.2, a transportation system management (enhanced bus service) alternative, two managed lane alternatives, and three fixed guideway alternatives were evaluated in the Alternatives Analysis Report based on their effectiveness in*

meeting the Project's goals and objectives related to mobility and accessibility, supporting planned growth and economic development, constructability and cost, community and environmental quality, and planning consistency. Energy use was also considered during the Alternatives Analysis phase. The analysis demonstrated that enhanced bus service would not meet the Purpose and Need for the Project. Additionally, this alternative would have required more transportation system energy and generated more air pollutant emissions than a fixed guideway alternative. The Managed Lane Alternative would have generated the greatest amount of air pollution and required the greatest amount of energy for transportation use. The Managed Lane Alternative would also have provided very little transit benefit at a high cost. The fixed guideway alternative will provide the greatest energy reduction. Further, the cost per hour of transit-user benefits would be between 160 and 240 percent less than the Managed Lane Alternative.

Rail Technology—*The Project's chosen technology ensures speed, reliability, and efficiency and is the only one that allows an automated, driverless system. As such, it will have a lower operating cost and support the highest ridership of all technologies examined. It may be operated above, at, or below grade. The requirement is that the system operates in an exclusive right-of-way. As stated previously, to preserve system speed, safety reliability, neither automobiles nor pedestrians can be allowed to cross the tracks. For at-grade operation, this would require a fenced right-of-way with no crossings. It is not possible to construct such a system in a number of areas along the alignment, including in and around Downtown, where roadways abut existing development. Regarding the energy delivery system, the Project already recognizes the effect of the elevated structure on the visual environment. Relying on an overhead catenary system would have exacerbated that effect.*

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

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

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February 4, 2009

American Planning Association Hawaii Chapter Comments on

Honolulu High-Capacity Transit Corridor Project
Draft Environmental Impact Statement (DEIS)
And Section 4(f) Evaluation

APA Hawaii Chapter has been a consistent supporter of the Honolulu Fixed Guideway project due to the potential it holds for both improving transportation mobility and access among the population, and due to the effect it can have on a more compact and sustainable form of development for the communities and the neighborhoods along the corridor.

APAHI comments are provided in two parts: Part One provides general comments are provided regarding the EIS document and the transit project. Part Two gives focused attention and comments on three important areas along the corridor: Kapolei/Ewa District; Waipahu/ Pearlridge; and Kakaako/Ala Moana. These comments reflect APA's strong interest in place-making at both the station areas and in the radius of access to the stations, which is complementary to but different than TOD.

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Part One: General Comments

We begin our comments by acknowledging that the preparers had a yeoman task of bringing together so much material and making it presentable to a wide range of interested parties. In that regard, we especially compliment the city and the preparers for their exciting and innovative use of clear graphics and visualization techniques. To our knowledge, this is the first time in Hawaii that video has been used to communicate content to those many who do not have the time or inclination to read through a lengthy, chart-laden document. The introduction overview video, the flyover feature, the interactive station graphics are excellent new tools that communicate the project visually and not just in words.

Continued Community Involvement

We want to encourage the City to continue to find ways to have ongoing community input and involvement throughout the design, construction and implementation phases. In particular, we believe that is it essential that each community develop a sense of ownership regarding its station(s) area and the system as a whole. This is best accomplished through early and frequent involvement that goes beyond one-way information sharing.

While APAHI supports the transit project, we continue to have reservations about both certain aesthetic issues, in particular, the proposed height at several urban locations, most notably Kakaako and Ala Moana. Heights at these stations has changed several times throughout the project, and we urge the City to continue to work with the community, APA and other professional organizations to find design review, value engineering and other means of generating alternate ideas for reducing the effects of a high guideway and station. At a minimum, the project and the Final EIS should go much farther in examining how landscaping and trees can help to not only mitigate/camouflage the guideway, but to provide shaded relief to pedestrians at street level.

Mitigations

In general, the lack of mitigations is a weakness of the Draft EIS which we would like to see corrected in the Final EIS. More attention to bringing better place-making features is essential. We would like to see drafts of the Design Guidelines that are mentioned. Most importantly, we believe that success of the transit project and its integration into the community, requires more attention to the details of how people/passengers are to access the station areas. What are the features of the sidewalks, crosswalks and amenities for pedestrian access, bicycle access, and bus access on a station-by-station basis? Without good (one might even say superior) access treatment that is safe, well-lit and pleasant, people will find other ways to travel than to use the transit. Good design brings good ridership.

Multi-Modal Access and Parking

Access by feeder bus is a critical piece of operations. More information should be provided on bus connections in the Final EIS, and it is expected that once the identification of bus access is started, that many adjustments and mitigation actions will be required. Which routes will run into

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which stations? How are passengers transferring from one transit mode to another? What about private and school buses, how can they use the transit center?

The one access mode that is treated in the Draft EIS is auto access, mainly in the form of park and ride facilities. Regrettably, the size and features of these parking facilities only looks at the number of stalls needed to serve the commuter shed. Many of the garages are large and are likely to not fit well into the surrounding community without looking like fortresses. Yet, if not properly sized, some communities will suffer from commuters using their streets for parking. Much much more attention needs to be paid to the trade-offs for proper sizing and management of parking needs.

" Spillover Parking Effects on Station Areas" (Page 3-41) section states that the West Loch, Pearlridge, Iwilei, and Ala Moana Center stations are projected to have the largest demand for spillover parking and in need of further study. A detailed table should be provided in the FEIS that shows for the Build Alternatives the spillover demand in the morning and evening peak periods for each of the four stations. Public input from community meetings held for the Waipahu Neighborhood TOD Plan indicated that residents felt strongly about the need for a park-and-ride facility at the West Loch station, and that without such a facility there would be spillover parking, particularly from residents living mauka of the freeway.

In designing the parking facilities for station areas, configure parking so that it does not dominate the area. While it is important to consider utilizing on-street parking in certain station areas, take into consideration the protection of neighborhoods. Of the many tools that can be implemented to minimize the impact of parking; the four principal ones are "move it, share it, deck it, and wrap it."

- Move it: Contrary to common practice, in which parking is located immediately adjacent to the station, broader community goals are best served when parking is moved away from the platform. The land nearest the station is the best land for development, so using it for parking means a lost opportunity. Placing parking a five to seven-minute walk from the station opens prime real estate for development.

- Share it: Sharing the parking among patrons who make use of it at different times of the day or week is an excellent way to minimize the space devoted to parking. The San Diego transit system, for example, shares one of its commuter lots with a multiplex theater. Transit riders use the parking on weekdays, and movie patrons use it on evenings and weekends. Shared parking can be operated privately or by a local parking authority. Parking fees offer an opportunity for additional revenue.

- Deck it: Structured parking is expensive. In Miami, for example, a basic parking garage without sprinklers costs $6,000 to $7,000 per space; more highly finished facilities in urban neighborhoods cost between $10,000 and $13,000 (creating an additional incentive to charge for parking). Charging for parking tends to be controversial for a transit agency because it is perceived as a deterrent to riders, but it is essential to finance needed facilities.

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- Wrap it: In place of the typical suburban sea of surface parking, creative designers can wrap a parking structure with retail shops, eateries, residences, and services, such as dry cleaners. This mixed-use approach makes the parking structure more attractive as an urban place, allows people who park there to take care of errands, makes the walk to and from the parking lot more interesting, and creates a built-in clientele for the businesses. This approach allows surface parking to be used as a form of land banking.

Part Two: Focused comments on transit project sections

1) Comments on Kaka'ako-Ala Moana Section (South Street to Ala Moana Center)

Kaka'ako Stations

If the location of the planned station near South Street is shifted to either the mauka or makai side of Halekauwila Street so that it can be integrated into a private development project, what will be impact on the Halekauwila Street right-of-way in terms of column placements and station access from the sidewalk? If the station is directly above the right-of-way, what is the impact on the streetscape (e.g., tunnel effect, station access landings in the sidewalk area, etc.)? While this may seem to be a detailed question to raise in the DEIS stage, the station impacts at the location are magnified because of the narrow right-of-way on Halekauwila Street (see related comments below) and the intensity of existing and project development in this neighborhood.

The planned station makai of Queen Street diamondhead of Ward Avenue is situated entirely within General Growth property. While this is preferable to the taking of a small property fronting Queen Street, as originally proposed, it is unclear how well this placement, as well as the alignment of the guideway approach and departure to this station will fit the planned street system and future redevelopment of this vicinity. The proposed guideway alignment follows the approximate alignment of the Halekauwila Street extension, which is part of Hawai'i Community Development Authority's current Kaka'ako Mauka Area Plan, but is proposed for deletion in the proposed revision to the Mauka Area Plan in favor of new local streets laid out in a "grid" pattern. The guideway alignment would cut diagonally across this grid street pattern rather than following planned street rights-of-way. It is also unclear how the planned station would be integrated into new development of this area. This particular station site should therefore be discussed in more detail to explain how it would be consistent with and supportive of future redevelopment of this area.

Physical Impacts on Halekauwila Street and Kona Street Rights-of-Way Relative to Small Businesses in Central Kaka'ako

Both Halekauwila Street and Kona Street function as local streets, the latter primarily to provide vehicular access to light industrial uses. The rights-of-way of both streets are relatively narrow (50-ft width for Halekauwila; 40-ft for Kona), which constrains their capacity to accommodate columns for the proposed fixed guideway while still providing the travel lanes, parking lanes, sidewalks and potentially bicycle lanes necessary for them to adequately serve as local and

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service streets to businesses as well as through traffic for all modes of travel. The Kona Street right-of-way is presently unimproved, lacking formal curbs, gutters, sidewalks, storm drainage systems and on-street parking spaces. Most existing uses along these streets lack sufficient off-street parking and loading spaces, so they depend heavily on the public right-of-way to serve this need.

The DEIS should expand the discussion of the impact of the guideway along these two streets, providing more detailed analysis of the effects of the guideway structure on adjacent uses and their operations. For example, it appears from the plans provided in the DEIS that 28 lots containing at least 80 small businesses along this segment of the rail alignment will have columns placed directly in front of their property. How may the placement of columns impede vehicular access to small lots and businesses? How are specific businesses and properties affected by the loss of on-street parking and loading spaces, including, in the case of Kona Street, the loss of informal parking and loading spaces?

Direct and Indirect Economic Impacts on Central Kaka'ako Small Lots and Small Businesses and on Urban Honolulu

Proposed property acquisition maps provided in the DEIS indicate that 9 private properties in Kaka'ako are slated for acquisition in their entirety. While the DEIS does not discuss details, we estimate that 20 small businesses that generate at least $14.4 million in annual income are directly displaced by this action. It remains uncertain whether it is viable for these businesses to relocate. For one, many of these businesses, which are predominately service-oriented, may not be able to survive a significant interruption in operations from relocation. Second, these businesses are located in Central Kaka'ako, despite high land costs, largely to provide convenient access to their customers (Hawaii Alliance for Community-Based Economic Development, *A Study of Kakaako Mauka Businesses*, September 2007). Third, there is a dearth of industrial-zoned land in urban Honolulu east of Iwilei, and small industrial service establishments in Iwilei, as well, are being displaced by the higher-value commercial uses that are allowed in that industrial-commercial mixed-use zone. Consequently, the closest true industrial district for small business is Kalihi Kai, where there is little, if any vacant land.

An additional 28 properties in Central Kaka'ako containing a minimum of 30 small businesses are proposed for partial acquisition. While partial acquisition may not necessarily impell the closure of these businesses, construction of the fixed guideway will cause disruptions to the operations of these businesses and inconveniences to their customers, most likely resulting in loss of revenue that could lead, in turn, to business failure. If the businesses manage to survive the construction period, they will continue to struggle against the pressure of rising property taxes due to escalating real estate values brought by proximity to the transit line. If these businesses are forced to relocate due to economic pressure, this will exacerbate the competition for scarce industrial land in urban Honolulu and thereby raise the cost of doing business.

The direct and indirect impacts on the small business district of Central Kaka'ako are not trivial. These businesses employ an estimated 1,971 people and generate estimated annual sales of $258,900,000 (Hawaii Alliance for Community Based Economic Development, October 2008). However, the indirect impacts extend well beyond Central Kaka'ako because the businesses in this neighborhood serve customers throughout urban Honolulu, including the major employment centers of the Downtown financial district, the Civic Center, Ala Moana and Waikīkī. If the

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service businesses in Central Kaka'ako disappear, where will residents and employees of urban Honolulu get their cars, appliances or equipment repaired? Where will the suppliers and storage facilities for Waikīkī hotels reside? Where will professional and financial offices go for printing and supplies?

Proposed Mitigation Measures for Central Kaka'ako Business District

While transit may have distinct benefits for commuter travel and general mobility, there is a complex network of interdependencies between Central Kaka'ako and the residents and businesses of these surrounding urban districts that will be significantly impaired by the traasit project, and we believe this has not been adequately acknowledged in the selection of the preferred alignment through Kaka'ako, the selection of the technology for that route, or in the suggested mitigation measures described in the DEIS. Given the significance of Central Kaka'ako as an employment center and as a service district for urban Honolulu, we believe that an alternative alignment along Kapiʻolani Boulevard, as proposed in the rail transit project two decades ago, should be given renewed consideration. If a route through Central Kaka'ako is inevitable, then the City, perhaps with State participation, should develop a proactive program to ensure the preservation of an industrial service district in Central Kaka'ako. Adoption of zoning to allow industrial uses is a passive measure that is insufficient to accomplish this. What is needed are programs to write-down land and redevelopment costs and provide real property and other tax incentives and rebates for small businesses in this district.

Ala Moana Station

As an "end-of-line" station for the MOS with the highest volume of boarding, de-boarding and transferring passengers on the entire system in a vicinity that already experiences a complex mix of traffic, the Ala Moana Station area requires detailed attention to design that accommodates all modes of travel – bus, private passenger vehicle, delivery vehicles, pedestrian and bicycle – in a convenient, efficient, safe and attractive manner. There is very little discussion of this in the DEIS. On page 2-36, for example, it is stated that transit connections to Ala Moana Station witll be provided by "enhanced bus service". What does that mean, exactly? While traffic studies may indicate that Kona Street presently has sufficient capacity to stage those buses, what if passenger volume exceeds projections? Perhaps most important, what facility enhancements are planned for the increased number of pedestrians that will be in this vicinity. What sidewalks will be widened? What crosswalks will be created or enhanced? What bus passenger waiting and loading areas will be developed? How will bicyclists be accommodated? How will conflicts between pedestrian, bicycle, bus and other vehicle movement be avoided or minimized. Will traffic signals or other controls be installed or modified?

Because space is so constrained at the Ala Moana Station site and pedestrian and bicycle pathways to the station are limited, we strongly recommend that a transit center be created on the presently unused property at 1391 Kapiʻolani Boulevard (TMK 2-3-039: 011) adjacent to the Ala Moana Station. This could be done through either outright acquisition of the property or joint development with the current or possible future owner. If the latter, the transit center for the private trolleys at the rear of the new Nordstrom store nearby could serve as a model in microcosm for the Ala Moana Station Transit Center.

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2) Comments on Waipahu to Pearlridge Section

Land Use Plans

The Future Land Use Plans and Policies Section, p. 4-13, should include summaries of the Waipahu Town Plan and the Pearl Harbor Historic Trails Plan.

Place-Node

The FEIS should include more discussion on the Waiphau Transit Station (Figure 2-18), the Leeward Community College Station (Figure 2-19), the Pearl Highlands Station (Figure 2-20), and the Pearlridge Station (Figure 2-21) in relation to place and node issues. Places need to be easy to get to and should be integrated physically and visually with their surroundings. This requires paying attention to how people can get around by foot, bicycle, public transportation, and the car – and in that order (Dittmar and Ohland, p. 31)

With the exception of the Pearlridge Station, which illustrates a connection to the Pearl Harbor Bike Trail, the above-referenced station areas are not pedestrian or bicycle friendly. The FEIS should include more discussion how these station areas will accommodate pedestrians and bicyclists. Also, a clear statement should be made whether bicycles will be allowed onto the transit platforms and into the cars and if so, where and how.

Parking

The Pearl Highlands Station should consider other parking location alternatives rather than a 1600 parking space parking structure adjacent to the station area. One alternative could include a shared parking approach to reduce the mass parking structure adjacent to a station area. Another alternative could be to charge for parking, which is controversial, but may be necessary for a form of value capture. Include a discussion in the FEIS related to these parking alternatives.

Neighborhoods

In Section 4.5.3 Environmental Consequences and Mitigation, include a discussion on pedestrian crossings along Farrington Highway and Kamehameha Highway in the Waipahu Neighborhood and Pearl City Neighborhood sections.

Visual and Aesthetic Conditions (Chapter 4.7)

Ft. Weaver Road to Aloha Stadium Landscape Unit (Viewpoints 1-4). Significant trees that are not preserved in place should be relocated, if possible, along the transit corridor.

The FEIS should include mitigative measures for Viewpoint 3, Kamehameha Highway at Ka'ahumanu Street, looking makai, since there is a high visual impact obstructing the views of the tree canopies in Neal S. Blaisdell Park.

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3) Comments on Kapolei/Makakilo/Ewa District

The urban development/urban investment alternative. The Draft EIS says that improved transit is needed to serve, among other users, the large and increasing number of workers that reside in the Ewa District who commute to various job centers in urban Honolulu. More needs to be said about creating job centers in the Ewa District, for shorter commutes as well as so-called "reverse commutes." We believe that as State, County and private parties continue to develop higher education campuses, high tech parks, industrial parks, in other words to create a "second city" the transit system will need to continue to evolve with an intra- Ewa "hub and spoke" and/or light rail transit system, not just an Ewa to downtown Honolulu system.

East Kapolei Station. The Draft EIS notes (p. 2-14) that "the East Kapolei Station would have one of the highest boardings in the system," and would therefore have a park and ride lot. The schematic plan for the East Kapolei Station shows a "Proposed Park and Ride Facility – 12 acres/900 spaces." There is no indication in the text or on the schematic plan regarding how buses, cars, bicycles, and pedestrians will gain access to this station. There should be some analysis and some conceptual plans for multi-modal access to the Station – especially for peak period conditions.

Ewa Development Plan – Draft Update/Revisions. The Draft EIS discusses (p. 4-13) "Future Land Use Plans and Policies," should describe the recently released "Ewa Development Plan – Draft Update/Revisions."

General Comment re: Projected "Total Daily Trips" – The Draft EIS (p. 3-17) projects an increase in Total Daily Trips, from about 3.26 million per day in 2007 to about 4.04 million per day in 2030. It would be helpful to provide the (DBED&T or other source) population projections for Oahu upon which these trips are projected. Some sensitivity analysis for error should be noted as well as the impacts of other factors that influence Total Daily Trip, including gas prices, home-based and tele-commute work, aging population, and similar lifestyle/lifecycle changes.

AR00001357

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MUFI HANNEMANN
MAYOR

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SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT10/09-336282

American Planning Association
P.O. Box 557
Honolulu, Hawaii 96809

Dear Sir:

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

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

General Comments

As part of the Final Design process, the DTS has developed specifications and Design Criteria to address the City's requirements for the Project. As discussed in Section 8.4 of the Final EIS, the City is conducting workshops with communities that will have rail stations. The purpose of the workshops is to engage the public about rail stations and provide opportunities to residents to contribute ideas about the appearance of station entryways in their communities. Ideas generated at the workshops will be incorporated into the station planning process. The overall process addresses design and planning issues in an integrated manner and focuses on the characteristics and preferences of the communities adjacent to each station. In addition, specific sites for landscaping and trees will be considered during Final Design when plans for new plantings will be prepared by a landscape architect.

Regarding the height of the guideway and stations, the designs continue to be revised to reflect community input and concerns. For example, recent changes have resulted in a lower proposed elevation for the Ala Moana Center station and guideway on Kona Street.

The station designs continue to be revised to address issues such as multi-modal access and connection to the surrounding environment. Place making around the station will be an important consideration that involves coordination between multiple agencies and the private sector. DTS is working with the Department of Planning and Permitting (DPP) to prioritize sidewalk improvements to coincide with station construction. The updated Oahu Bike Plan is being developed with transit access in mind to encourage connections. However, it should be noted that areas beyond the station itself are not part of the Project and therefore not addressed in this Final EIS.

Existing and future bus routes, including route numbers, are provided in Appendix D in the Final EIS. This appendix also includes a series of station area maps showing bus routes and connections to fixed guideway stations. As stated in Section 3.4.2 of the Final EIS, most fixed guideway stations will offer connections to local bus routes. In some cases, an off-street transit center either already exists or will be built to accommodate transfers. In other cases, an on-street bus stop with dedicated curb spaces or a pullout will be located adjacent to the fixed guideway station. Paratransit vehicles will be accommodated at all stations and, in some cases, space for private tour buses, taxis, and/or special shuttles also will be included.

Each station included an analysis of space requirements for all access functions, including private shuttles and school operations. The amount of space provided at each station was based upon both existing operations and possible future services.

Table 3-20 in the Final EIS identified mode of access from local bus and other modes to the stations. Transfers from bus to rail account for the largest share under any project alternative.

Regarding the park-and-rides, only one facility is planned to be in a garage; the others will be surface parking lots. The Pearl Highlands Station will have a multi-story parking garage with a direct access ramp from the H-2 Freeway to be used by buses and cars.

This station is surrounded by major roadways, including the H-1 and H-2 Freeways, Farrington Highway, and Kamehameha Highway, which will make it a very popular park-and-ride location.

Regarding spillover parking, a detailed table of station-by-station daily spillover demand has been added as Table 3-22 to the Final EIS. As noted in Section 3.4.4 of the Final EIS, actual spillover parking at guideway stations will be affected by several factors such as availability of parking, changing conditions that will affect actual access to stations, and future development in station areas.

As indicated in Section 4.6.3 of the Final EIS, ongoing coordination efforts with the public will help develop design measures that will enhance the interface between the transit system and the surrounding community.

West Loch, as well as Pearlridge, Iwilei, and Ala Moana Center, are all urban neighborhood stations that will be accessed primarily by bus, walking, bicycle, and passenger drop-off. However, the model also predicts some demand for parking at these locations. The City will conduct surveys to determine the extent of spillover parking near the stations and implement one or more mitigation strategies as needed. Potential strategies include the following:

- *Parking restrictions*
- *Parking regulation*
- *Permit parking*
- *Shared parking arrangements*

Once implemented, strategies will be monitored and adjustments will be made as needed.

As stated in Section 2.5.5 of the Final EIS, Pedestrian and Bicycle Access, design criteria developed for stations place the highest emphasis on walk and bicycle access. The Design Criteria provide specific direction for pedestrian and bicycle access features at stations. For example, the criteria state that adequate pedestrian circulation routes shall be provided with an emphasis on avoiding pedestrian and vehicular conflicts and enabling good visibility to each station entrance. This emphasis will be complemented by distinct and clear graphic signage. For bicycle access, the criteria include language stating that racks shall be placed at the station plaza near the station entrance where public visual surveillance is possible and/or where closed circuit television monitoring is present.

Draft EIS Comments

The ongoing station area planning and design process addresses issues raised by the commenter and focuses on the characteristics and preferences of communities surrounding each station. The City is conducting public station design workshops to engage the public about rail stations and provide opportunities to residents to contribute ideas about the appearance of station entryways in their communities. Ideas generated at the workshops will be incorporated into the station planning process. For more information and to get involved in this process, please visit the project website at www.honolulutransit.org.

Regarding impacts to Halekauwila Street, the guideway will be supported by straddle-bent columns within the existing right-of-way. As discussed in Section 4.8.3 of the Final EIS, this will create a sense of enclosure for drivers and pedestrians. Some of the on-street parking will need to be removed, but existing access will be maintained.

The columns needed to support the guideway along Halekauwila and Kona Streets will be spaced at intervals of 120 to 150 feet. As part of the Final Design process, RTD has developed specifications and design criteria to address the City's requirements for the Project, which will include final placement of columns. Minimizing effects to adjacent

land uses will be a key consideration. As indicated in Section 3.4.3 of the Final EIS, the guideway placements will not affect traffic operations. In addition, as shown in Table 3-25 of the Final EIS, no sidewalks will be closed as a result of the Project.

Table 3-24 in the Final EIS lists project-related effects on parking (on and off street) and loading zones. As shown in this table, loading zones on Kona Street will not be affected by the Project, but parking spaces will be removed to make room for support columns. Access to businesses will be maintained.

Acquisitions, displacements, and relocations are discussed in Section 4.4 of the Final EIS. Property will be purchased at market rates. As stated in Section 4.4.3 of the Final EIS, compensation will be provided to affected property owners, businesses, or residents in compliance with all applicable Federal and State laws and will follow the Federal Uniform Relocation Assistance and Real Property Acquisition Policies Act. It is beyond the scope of this EIS to predict where businesses will choose to relocate, if needed.

The DTS has considered the complexities and interdependencies of the Kakaako district and, overall, the Project is expected to strengthen the district's function as an employment center, although the nature of businesses in the future may be different than those in the past. The Project also could bring in new customers for businesses and services because of the increased mobility and access the new transit mode will bring to a wider region.

Kapiolani Boulevard was examined as a potential alignment during the Alternatives Analysis phase and was rejected for a variety of reasons, including impacts to traffic and right-of-way needs that would affect property access and would require removal of street trees, many of which are considered notable, excellent, or exceptional.

Ala Moana Center Station will be the busiest in the system and will continue to be a vital link for transportation services in the future. Currently, 42 buses serve Ala Moana Center on Kona Street in the a.m. peak hour, with 47 in the p.m. peak hour. These numbers will increase to 60 buses in the a.m. peak hour and 57 buses in the p.m. peak hour in the 2030 bus network. However, the number of routes operating will decrease from 21 routes to 11 routes. This consolidation of bus routes will make it easier for both residents and visitors, and create efficiencies in transfers from one mode to another. This is what is referred to as "enhanced service" in the Draft EIS.

During the peak hour, the University of Hawaii at Manoa will be served by 23 buses on Kona Street, while 21 buses will serve Waikiki. Average headways (time between buses) to both of these destinations will be less than three minutes. The major bus routes on Kona Street will be operated dynamically such that intervals between buses could be adjusted as passenger demands warrant to avoid transferring passengers accumulating on sidewalks. A seamless transfer is being designed to alleviate the types of problems referred to in your comments. This is possible with consolidation of bus routes on Kona Street, even as the number of transit riders is increasing.

A bus staging area has been identified and is being developed just Ewa of Pensacola Street between Kona Street and Waimanu Street. This staging area will accommodate

five 60-foot buses for schedule recovery and layover currently occurring along Kona Street, and to provide capacity for additional in-service buses.

Accommodating walk and bicycles access to stations will also be important. As stated previously, design criteria developed for stations place highest emphasis on walk and bicycle access.

In response to your comment, Section 4.2.2 of the Final EIS has been revised to include summaries of the Waipahu Town Plan (Waipahu Special Area Plan) (1995) and Pearl Harbor Historic Trail Master Plan prepared by the City and County of Honolulu (May 2001).

As indicated in Chapter 3 of the Final EIS, overall access to public transit will be enhanced with the Project. Substantial project ridership will be provided by local bus and people walking and biking to the station. Bus and walk/bike access to stations will account for 90 percent of total trips in the a.m. peak period (Table 3-20 in the Final EIS). Access to stations will be enhanced by accommodating bicyclists and pedestrians. Several stations will be located near existing or planned bicycle facilities.

Section 3.4.2 of the Final EIS describes station characteristics, including how various access modes will be accommodated by the Project. As is the case with all stations, the Waipahu, Leeward Community College, Pearl Highlands, and Pearlridge Stations will accommodate bicyclists by providing racks or lockers. Bus transfers will be provided at off-street facilities at several stations, including Waipahu, Pearl Highlands, and Pearlridge. Bus routes at these stations are noted in Figures 2-21, 2-23, and 2-24 of the Final EIS. No bus routes are identified at the Leeward Community College Station; however, given proximity to the college, walk access will likely be the dominant mode.

As also stated previously, design criteria developed for stations place highest emphasis on walk and bicycle access.

Park-and-ride facilities will be provided at stations with the highest demand for drive-to-transit access. Auto access will be provided at the Pearl Highlands Station, with park-and-ride stalls located in a garage.

As noted in Chapter 2 of the Final EIS, bicycle facilities in the form of racks and/or lockers will be provided near each station entrance. Bicycles will be allowed on trains and regulated by a bicycle policy that is being developed. Station area characteristics will be completed during Final Design.

As noted in Section 3.4.2 of the Final EIS, ridership information for the Project is based on demand projections, including demand for parking, for 2030. Location and sizing of the park-and-ride facilities is based on estimated long-term demand and availability of land near stations. There is currently no plan to charge for using park-and-ride facilities, but this may change in the future. The location of the Pearl Highlands park-and-ride was established after reviewing a variety of alternatives. With the direct ramp connection from the H-2 Freeway, this facility will have a large demand that can only be accommodated with a multi-level structure. Alternatives to surface parking lots, such as

shared parking, are possible in the future as transit-oriented development (TOD) occurs around stations.

The Final Design process will include consideration for appropriate pedestrian crossings along Farrington and Kamehameha Highways. As part of this process, DTS has developed specifications and design criteria to address the City's requirements for the Project. Section 4.6.3.of the Final EIS contains a general discussion of project-influenced pedestrian access within neighborhoods.

Street trees along the project alignment are discussed in Section 4.15 of the Final EIS. Twenty-eight Notable true kamani trees on the makai side of Dillingham Boulevard will be removed. As stated in your letter, trees on the makai side of the street are already periodically pruned because of the presence of utilities. Trees on the mauka side of Dillingham Boulevard are not pruned and will be preserved. The State Historic Preservation Division has determined that some trees on Dillingham Boulevard are eligible for the historic register. As illustrated in Table 4-33, the Project will not affect any trees on Kapiolani Boulevard. Affects to street trees will be mitigated by transplanting existing trees or planting new ones, where possible. Trees suitable for transplanting that are displaced by construction will be relocated to C&C project nursery until they can be transplanted to another part of the project area. The City will coordinate with Hawaii Department of Transportation's highway landscape architect. The location where street trees will be transplanted will be selected based on project-specific criteria that could include the following:

- *Areas where existing landscaping will be lost along the corridor*
- *Areas where opportunities exist for enhancing existing streetscapes near the study corridor*
- *Areas where stations and parking lots will be constructed*
- *Areas where shared benefits will be accomplished, such as areas adjacent to parks or historic sites*

In addition to transplanting existing trees, plans for new plantings will be prepared by a landscape architect during Final Design to further mitigate effects to street trees. To mitigate any substantial effects in areas that require tree removal, special attention will be given to developing landscaping plans so that new plantings will provide similar advantages to the community. If new plantings will not offer equitable mitigation (e.g., older mature trees that are removed), additional younger trees will be planted that will, in time, develop similar benefits.

The Final EIS acknowledges that the visual impact at Viewpoint 3 will be high, and that some views will be obstructed. Overall, it is noted in Section 4.8 of the Final EIS that changes to some views will be unavoidable, and depending on the degree of view obstruction or blockage, some view changes will be substantial. The viewer's response to this change will vary with exposure and sensitivity.

As stated in Section 4.8.3 of the Final EIS, the following measures will be included with the Project to minimize negative visual effects and enhance the visual and aesthetic opportunities that it creates:

- *Develop and apply design guidelines that will establish a consistent design framework for the Project with consideration of local context.*
- *Coordinate the project design with the City's transit-oriented development program within the Department of Planning and Permitting.*
- *Consult with the communities surrounding each station for input on station design elements.*
- *Consider specific sites for landscaping and trees during Final Design when plans for new plantings will be prepared by a landscape architect. Landscape and streetscape improvements will mitigate potential visual impacts.*

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

As discussed in Section 4.2.2 of the Final EIS, development plans for the Ewa area direct new growth and supporting transit facilities to growth centers. Section 4.2.3 of the Final EIS states that the Project is consistent with adopted State and Local government transportation and land use plans and polices. Part of the Ewa Development Plan vision for a transit corridor linking the City of Kapolei, Waipahu, and the Primary Urban Corridor (PUC) includes encouragement of higher-density residential and commercial development around the City of Kapolei transit node and the transit corridor.

While a 900-space park-and-ride facility will be provided at the East Kapolei Station, most of the demand is expected to come from local bus access.

Figure 2-17 in the Final EIS shows that there will be station entrances to the East Kapolei Station on both sides of North-South Road. There will be bus stops in front of both station entrances. There will be a pedestrian connection between the park-and-ride facility and the station entrance. There will also be an elevated platform and connecting bridge between the station entrances.

The East Kapolei and UH West Oahu Stations will be directly accessible from bike lanes on North-South Road and from cross streets at the stations. Bicycle riders will be able to park at the stations or take their bicycles onto the trains in accordance with a bicycle policy that will be developed.

In a recent conversation with the DPP, a representative indicated that the Ewa Development Plan update is still being reviewed. The City is expected to adopt the Plan by January 2010 (Bob Stanfield, March 2009).

The key change in the Ewa Development Plan update is creation of an "urban growth boundary." Those falling within it do not need to come before the City Council for a development plan amendment before applying for zoning. The Plan states that "[a]s part of the Development Plan vision for a transit corridor linking the City of Kapolei, Waipahu, and the PUC, higher density residential and commercial development should be encouraged around the City of Kapolei transit node and the transit corridor..." This vision remains in the adopted plan.

As stated in Section 4.2.2 of the Final EIS, development plans for the Ewa area direct new growth and supporting transit facilities to growth centers. Section 4.2.3 of the Final EIS states that the Project is consistent with adopted State and Local government transportation and land use plans and polices. The Ewa Development Plan is discussed in more detail in Section 2.1.5 of the Land Use Technical Report.

Population and employment projections are from the Hawaii Department of Business, Economic Development, and Tourism and are incorporated into the travel-forecasting model of the OahuMPO. All information upon which the forecasts rely is available from the OahuMPO and discussed in the Travel Forecasting Results and Uncertainties Technical Report.

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

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Honolulu High-Capacity Transit Corridor Project

Welcome to the Honolulu High-Capacity Transit Corridor Project's Public Hearing for the Draft Environmental Impact Statement/Section 4(f) Evaluation.

This public meeting and hearing has been designed to inform the public about the transit project, explain materials contained in the Draft EIS, answer questions from the public, and collect public input on project issues related to the Draft EIS, Section 106 of the National Historic Preservation Act, Section 4(f) of the U.S. Department of Transportation Act, and floodplains affected by the project.

Please review the project information and ask project staff any questions about the project that you might have. The Draft EIS is available on the project website at www.honolulutransit.org.

You may provide official comments in several ways. Here at this Public Hearing you may provide oral comments to a court reporter who will record them for the record or use this form to provide written comments. After the meeting, you may provide an on-line comment at www.honolulutransit.org or use this form to send a written comment to the Department of Transportation Services. All comments must be postmarked or received by January 7, 2009 in order for them to be included in the Final EIS.

Name: LESLIE A AMONG Address: 1720 ALA MOANA BLVD-E103
HON. HI, 96815

Phone: 808-779-3017

E-mail: LESLIE.AMONG@YAHOO.COM

Comment(s): MEMBER OF WAIKIKI NEIGHBORHOOD BOARD DISTRICT-9
I PROPOSED A NEW ROUTE AT MY LAST NEIGHBORHOOD BOARD MEETING FOR THE TRANSET CORRIDOR PROJECT FROM ALA MOANA CENTER TO ALA WAI CANAL MAUKA SIDE DOWN TO THE HARD ROCK CAFE AS A TRANSIT STATION THAT PROPERTY HAS BECOME AVAILABLE. CONTINUE UP ALA WAI CANAL MAUKA SIDE TILL YOU HIT MANOA PALOLO STREAM HEAD UP ALL THE WAY TO UH CAMPUS THIS ROUTE WILL BE THE BEST WAY TO AVOID LEGAL BATTLES, AND A GOOD WAY TO FIND COMMON GROUND FOR ALL THE RESCO.
I WILL BE HAPPY TO SHARE THIS IDEA WITH ALL CONCERNED.
MAHALO, Les A Among - WNB #9

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-331988

Mr. Leslie A. Among
1720 Ala Moana Boulevard, E103
Honolulu, Hawaii 96815

Dear Mr. Among:

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

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

The Project has logical termini at East Kapolei and Ala Moana Center and independent utility from any extensions that may be constructed in the future. The proposed future extensions to West Kapolei, Salt Lake Boulevard, Waikiki, and UH Manoa are discussed in the cumulative impacts sections of Chapters 3 and 4 of this Final EIS. However, the future extensions are not part of this Project; thus, they are not required to be evaluated under Chapter 343 of the Hawai'i Revised Statues and the NEPA. Under NEPA, environmental analysis is only required when there is a proposed action by a Federal agency. Here, because the future extensions are not proposed for implementation at this time, they are not part of the Project studied in this Final EIS. It would be premature to undertake an environmental analysis of the extensions (beyond the cumulative impacts analysis) because they are not part of the proposed action to be taken by the City and FTA. If the future extensions are proposed for implementation in the future, environmental analysis of the extensions and appropriate alternatives will be undertaken at that time.

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

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

298462

Mr. Wayne Yoshioka
Director, Dept. of Transportation Services
City and County of Honolulu
650 South King Street, 3rd Floor
Honolulu, Hawaii, 96813

RECEIVED
2009 FEB 5 P12:35
DEPT. OF TRANSPORTATION SERVICES
CITY AND COUNTY OF HONOLULU

February 4, 2009

Dear Mr. Yoshioka,

The Draft Environmental Impact Statement – (DEIS) – of the City's proposed rail system is incomplete.

Before the public can make an informed decision about this project; they must have a point-by-point comparison of the possible transportation systems.

Your transportation team spent time mentioning the "Do Nothing" choice. In reality, "Doing Nothing" will never be a choice. The leeward coast needs relief.

The public was given the opportunity to vote whether they wanted rail or not, but they were not provided information to compare the systems in order to make an informed decision. Only Rail was advertised, - for months -, at public expense.

Colorful T.V. ads paid by the tax payers were at best 50% right. Your consultants were paid big dollars to push the Mayor's choice. At community meetings you only presented the rail project, - nothing about possible alternatives. The "Go Rail" team came to neighborhood meetings and presented the Mayor's message, but they couldn't or wouldn't answer the questions.

In the beginning of the rail discussion, the League of Women Voters secured one hour of T.V. time for a round-table discussion on transportation, but the City refused to participate. Rick Hamada provided time on his Monday morning program for discussion on the transportation issue, but after several programs, the City's team refused to participate.

During the Primary, the Mayor participated in only one community candidate forum. It showed that Panos Prevedouros presented many concerns to the Mayor's project. If the rail project is so right for Oahu, the Mayor's team and the Mayor should have been able to discuss the project and answer all community questions in detail They refused to do so.

Another huge concern of this project is the cost. I don't think you can possibly know what the cost will be?, especially since major changes are being made weekly. The cost could end up being more than the City of Honolulu, the County of Oahu can afford. When we add up all the basic infrastructure projects that must be of priority, this rail project at $5 BILLION plus is too costly for tax payers to handle. There are too many unknowns. Infact the Mayor was just in Washington D.C. with his hand out for Federal funds to pay for Oahu's basic projects. We can't afford this rail project now or maybe never, especially when we have alternative choices.

Professor Panos Prevedouros and his University students have presented a public report on transportation alternatives, but your team has ignored it.

There simply has not been an honest presentation of the financial and transportation impacts on Oahu.

I am very concerned that this DEIS does not fit our Hawaiian Sense of Place. We must step back and specifically compare all alternatives, -one to the other,- to be certain that we agree on a project that we can afford and that meets our needs.

CC: Mr. Ted Matley
CC: Gov. Linda Lingle
CC: Honolulu City Council

Eve G. Anderson
P.O. Box 25550
Honolulu, 96825
259-7706

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT10/09-336295

Ms. Eve G. Anderson
P.O. Box 25550
Honolulu, Hawaii 96825

Dear Ms. Anderson:

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

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

The "Do Nothing" alternative, or No Build Alternative as it is referred to in the Draft EIS, is the baseline study of existing and future characteristics of the study area. Thus, evaluating the No Build Alternative is mandatory and must remain as an alternative in both the Draft and Final EISs.

Public involvement concerning the Project has been continuous since the beginning of this Project through print, radio, and television media, as well as presentations by the Project Team to the community. Members of the Project Team were at public meetings and were available to answer questions at those meetings.

Regarding the cost of the Project, financial studies have been prepared for the Project and are discussed in Chapter 6. FTA imposes guidelines for estimating costs to prevent

overruns. Cost estimates are carefully reviewed by various FTA representatives and risks and uncertainties are considered in developing financial plans for the Project. Chapter 6 of the Final EIS discusses this along with other financial information. The Federal government will contribute between 20 and 25 percent of the total capital cost. In addition, information on transportation impacts is included in Chapter 3.

In addition, the Project Team has studied various alternatives and ideas brought forth from those outside the Project and have determined, in conjunction with FTA, that the current selection of an elevated steel wheel on steel rail alternative will most benefit Oahu. Efforts are being undertaken to ensure that stations reflect the sense of place of the area where they are located. As discussed in Section 8.4 of the Final EIS, the City is conducting workshops with communities that will have rail stations. The purpose of the workshops is to engage the public about rail stations and give opportunities to residents to contribute ideas about the appearance of station entryways in their areas. Ideas generated at the workshops will be incorporated into the station planning process. For more information and to get involved in this process, please visit the project website at www.honolulutransit.org.

The alternatives presented in Chapter 2 of the Final EIS expand upon the Draft EIS. Section 8.6.1 in the Final EIS summarizes comments received from the public on alternatives considered. The Final EIS, as presented, documents and evaluates the economic, social, and environmental impacts on the natural and built environments of the alternatives, including the No Build. The Project is consistent with existing land use plans and transportation elements of adopted State and Local government plans.

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

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
Creation Date :	1/24/2009
Creator Affiliation :	
First Name :	Ed
Last Name :	Appleby
Business/Organization :	
Address :	
Alternative Preference :	
Apt./Suite No. :	
City :	
State :	HI
Zip Code :	96707
Email :	eappleby@hotmail.com
Telephone :	
Telephone Extension :	
Add to Mailing List :	Email
Submission Method :	Website
Other Submission Method :	
Submission Date :	01/24/2009
Submission Content/Notes :	We haven't seen much about parking/park-and-ride. It's the most elusive piece of information to answer "will we use it." Is there somewhere in the EIS or elsewhere that specifically addresses this?

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-334282

Mr. Ed Appleby
eappleby@hotmail.com

Dear Mr. Appleby:

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

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

Chapter 2, Section 2.5.7 of the Final EIS discusses park-and-ride facilities. The size and capacity of park-and-ride facilities are presented in Table 2-8. A total of 4,100 park-and-ride spaces are planned, distributed over four locations. As stated in Section 2.5.7 with the exception of Pearl Highlands, which will be a parking structure, all park-and-ride lots are expected to be constructed as surface parking. Criteria has been developed that will guide design of Project elements, including park-and-ride facilities. As indicated by Chapter 6 of the Final EIS (Section 6.3.2) potential operating and maintenance funding sources do not include revenues from Project park-and-ride facilities. There are currently no plans to charge for parking at park-and-rides.

The FTA and DTS appreciate your interest in the Project. The Final EIS has been issued in conjunction with the distribution of this letter. You may view the Final EIS on the Project website at www.honolulutransit.org. You may request a DVD of the Final EIS and additional content through the "Contact Us" tab on the website or by calling the Project hotline at 566-2299.

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

Very truly yours,

WAYNE Y. YOSHIOKA
Director

7 December 2008

City and County Director of Transportation Services

Atnn: Wayne Yoshioka

Subject: DEIS for Rail Transit System

I want to make a comment and receive a response concerning the DEIS on the Mayor's Rail Transit DEIS.

a. In Hawaii whenever construction is done, Hawaiian bones or iwi are found. This creates tremendous delays in construction and increased costs. The DEIS does not adequately address this issue as it will become the major issue of the construction. I want to know what the contractors will do and what provisions have been made to pay for the increases in costs and community concerns when construction unearths Hawaiian bones.

Earl Arakaki

91-030 Amio, St. , Ewa Beach, Hi 96706

RECEIVED
08 DEC 9 P12:34

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT12/08-290821R

Mr. Earl Arakaki
91-030 Amio Street
Ewa Beach, Hawaii 96706

Dear Mr. Arakaki:

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

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

In the event that burials are encountered, they will be identified and managed in compliance with applicable laws. This will include consulting with project proponents, the Oahu Island Burial Council, State Historic Preservation Division, and recognized lineal and/or cultural descendents to develop burial treatment plans. While this could slow down the project development process, applicable laws will be followed. The treatment of burials discovered during construction will be included in the Programmatic Agreement (PA). This is discussed in Section 4.18.11 of the Final EIS. The complete PA is available in Appendix H of the Final EIS. The Project has built contingencies into the total Project cost estimates to account for the potential for burials to be found.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this

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

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

292589

Evelyn Arakaki, 91-030 Amio Street, ewa beach hi 96706

December 6, 2008

To Mr. Wayne Yoshioka concerning the DEIS for the rail system.

Dear Mr. Yoshioka,

I would like to have this comment made to the DEIS on the rail transit system. A reply would be appreciated.

My comment: I have lived in Hawaii most of my life. We have a unique and beautiful sense of beauty many call it a Hawaiian sense of place. The visual image of an overhead train 30 feet over my head and which can be viewed from all over the south side of Oahu will be very ugly. The DEIS does not address this point that the train will be a visual blight and give a negative impression to our visitors. What will the city do and how much will it cost to make the train acceptable to the residents and contribute to the view instead of taking away our beauty?

Mahalo

Evelyn Arakaki

Copy to: FTA Mr. Ted Matley

Gov. Linda Lingle

RECEIVED
08 DEC 18 P 3:40
DIRECTOR'S OFFICE
DEPT. OF
TRANSPORTATION SERVICES
CITY & COUNTY OF HONOLULU

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

May 21, 2010

RT10/09-336272

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

Dear Ms. Arakaki:

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

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

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

Guideway and column materials and surface textures will be selected in accordance with generally accepted architectural principles to integrate the guideway with its surrounding environment. Landscaping and streetscape improvements will mitigate potential visual impacts. In addition, the following measures will be included to minimize negative visual effects and enhance the visual and aesthetic opportunities that the Project creates:

- *Develop and apply design guidelines that establish a consistent design framework for the Project with consideration of local context*
- *Retain existing trees where practical and provide new vegetation*
- *Shield exterior lighting*
- *Coordinate project design with the City's transit-oriented development program within the Department of Planning and Permitting*
- *Consult with communities surrounding each station for input on station design elements*

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

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

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Honolulu High-Capacity Transit Corridor Project

Welcome to the Honolulu High-Capacity Transit Corridor Project's Public Hearing for the Draft Environmental Impact Statement/Section 4(f) Evaluation.

This public meeting and hearing has been designed to inform the public about the transit project, explain materials contained in the Draft EIS, answer questions from the public, and collect public input on project issues related to the Draft EIS, Section 106 of the National Historic Preservation Act, Section 4(f) of the U.S. Department of Transportation Act, and floodplains affected by the project.

Please review the project information and ask project staff any questions about the project that you might have. The Draft EIS is available on the project website at www.honolulutransit.org.

You may provide official comments in several ways. Here at this Public Hearing you may provide oral comments to a court reporter who will record them for the record or use this form to provide written comments. After the meeting, you may provide an on-line comment at www.honolulutransit.org or use this form to send a written comment to the Department of Transportation Services. All comments must be postmarked or received by January 7, 2009 in order for them to be included in the Final EIS.

Name: Jane Ace

Address: 3445 Kalukalu Way Hon HI 96815

Phone: 839-7064

E-mail:

Comment(s):

I still favor the 'No Build' solution; after that the Airport route

DEPARTMENT OF TRANSPORTATION SERVICES

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-331798

Ms. Jane Au
3415 Kahikolu Way
Honolulu, Hawaii 96818

Dear Ms. Au:

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

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

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

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

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

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

December 8, 2008

Mr. Wayne Yoshioka
Director of Transportation Services
City and County of Honolulu
650 S. King St., 3rd Floor
Honolulu, HI 96813

Dear Mr. Yoshioka:

I have several questions regarding issues I feel are not adequately addressed in the Draft Environmental Impact Statement which was issued far too late for the voting public to review and, therefore, has become suspect of political overtones.

I am relieved that the Airport route is now being coosidered rather than the Salt Lake Route. I have been deeply concerned and depressed at the thought of this mammoth project running the length of our beautiful neighborhoods of Foster Village, Aliamanu and Salt Lake. I continue to be concerned about the aesthetics of this structure and its impact on the beauty of the Ewa flatlands and the overwhelming "bigness" of all that concrete running through the city areas. The stations also appear to be massive structures. I do not feel the DEIS has sufficiently addressed the issue of the visual effect of the transit system.

How will overhead structures, the noise and vibration levels and the interference during construction affect the many businesses and schools along the alignment? Will the businesses and schools be able to continue operation?

At the end of this project, the City will be forced to pay outrageous prices for property because land owners will have the upper hand. How seriously has the possibility of setting up a temporary rail yard near the airport or Aloha Stadium been considered?

I would also like to know what the future of Aloun Farms will be if they are forced to relocate.

Sincerely,

Jane Au

Jane Au
3415 Kahikolu Way
Honolulu, HI 96818

cc: Mr. Ted Matley, FTA Region IX
Governor Linda Lingle

RECEIVED
08 DEC 10 P 3:11

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT12/08-290970R

Ms. Jane Au
3415 Kahikolu Way
Honolulu, Hawaii 96818

Dear Ms. Au:

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

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

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

The Alternatives Analysis phase, which preceded the EIS process, is documented in Chapter 2 of the Final EIS. It evaluated a range of modal and general alignment alternatives, in terms of their costs, benefits, and impacts. The scoping process for the Alternatives Analysis involved a presentation of the viable alternatives to the public and interested public agencies and officials to receive comments on the Purpose and Need, alternatives, and scope of the analysis. Scoping for the EIS followed the FTA process that provides for a culling of alternatives studied in the EIS through an Alternatives Analysis. The scoping process initiated for the Alternatives Analysis included a variety of highway, bus and fixed guideway options for consideration. During the later scoping effort for the EIS, the public was requested to propose alternatives that would satisfy the purpose and need at less cost or with greater effectiveness, less environmental or community impact and to propose alternatives that were not previously studied and eliminated for good cause. The only alternative that emerged that met these criteria was a fixed-guideway alternative following several alternative alignments. All reasonable alternatives that emerged from these processes were ultimately evaluated in the Draft and Final EISs.

The island's unique visual character and scenic beauty was considered in the visual and aesthetic analysis presented in the Draft and Final EISs. As discussed in Section 4.8 of the Final EIS, the Project will be set in an urban context where visual change is expected and differences in scales of structures are typical.

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

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

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

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

- *Develop and apply design guidelines that will establish a consistent design framework for the Project with consideration of local context.*

- *Coordinate the project design with City TOD planning and DPP.*
- *Consult with the communities surrounding each station for input on station design elements.*
- *Consider specific sites for landscaping and trees during the final design phase when plans for new plantings will be prepared by a landscape architect. Landscape and streetscape improvements will serve to mitigate potential visual impacts.*

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

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

The City will continue to consult with the communities surrounding each station for input on station design elements.

Noise and vibration levels during construction will be subject to and follow local noise ordinances, so construction noise and vibration will not affect how businesses and schools operate. During transit operations, no noise or vibration impacts are predicted for any schools or businesses on the proposed alignment.

Businesses and schools will still be able to operate during and after construction of the elevated guideway.

Lastly, every attempt is being made to minimize property takes and relocations along the proposed right-of-way, and is one reason for the decision to elevate the guideway. Property will be purchased at market rates. As stated in Section 4.4.3 of the Final EIS, those from whom property is to be acquired will be treated according to the requirements of the Federal Uniform Relocation Assistance and Real Property Acquisition Policies Act. It provides for purchase at fair market value and includes relocation assistance to those affected. The Uniform Relocation Act provides that those in need of relocation must be placed in comparable quarters. It should be noted that because of the design of the system, it impacts few properties compared to other projects of this size and requires full acquisition of only 33 properties as indicated in Section 4.4.3. The City has right of condemnation in cases where property owners attempt to demand rates substantially above the market rate for a property. There is not enough available land in the vicinity of either the Airport or Aloha Stadium for a maintenance and storage facility.

One of the two site options for a maintenance and storage facility is located within Aloun Farms. The other site option is located near Leeward Community College and is the site of a former Navy fuel drumming operation. This is the preferred alternative and discussions have been underway with the Department of Hawaiian Homelands to acquire it. If the Project can

acquire this site, the impact on agricultural lands on Oahu will be much less than is described in the Draft EIS. Aloun Farms' headquarters, located at the site of the other maintenance and storage facility, will not have to move.

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

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
Creation Date :	2/2/2009
Creator Affiliation :	
First Name :	Mary
Last Name :	Avenido
Business/Organization :	
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Telephone Extension :	
Add to Mailing List :	Email
Submission Method :	Website
Other Submission Method :	
Submission Date :	02/02/2009
Submission Content/Notes :	Go thru the airport! I ride the 42 from Ewa Beach every morning and the rail going to the airport would continue close to the same route. Also when I travel it is too exensive to park at the airport; with the rail, tourists would also benefit. It might take away from the taxi business from the airport but tourists would spend more on the local economy if they didn't have the huge fare to and from Waikiki.

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

May 21, 2010

RT9/09-334410

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

Dear Ms. Avenido:

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

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

Your preference for the Airport Alternative has been noted. While each of the alternatives includes trade-offs between benefits and impacts, the Airport Alternative from East Kapolei to Ala Moana Center has been selected as the preferred alternative. The identification of the Airport Alternative as the preferred alternative was made by the City to comply with FTA's NEPA regulations that state that the Final EIS should focus on the preferred alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative, public input on the Draft EIS, and City Council Resolution 08-261 identifying the Airport Alternative as the Project. The selection of the Airport Alternative is described in Chapter 2 of this Final EIS. The discussion of the alternatives considered is included in Chapter 2 of this Final EIS and the Alternatives Analysis. As discussed in Section 3.4.2 of this Final EIS, the Airport Alternative will carry the most passengers with 116,000 daily passengers and 282,500 daily trips in 2030, thereby resulting in the greatest transit-user benefits. The Airport Alternative

will also result in the fewest vehicle miles traveled and vehicle hours of delay, as well as provide access to major employment areas, including Honolulu International Airport, that will have substantially greater ridership than the other alternatives considered.

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

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
Creation Date :	2/2/2009
Creator Affiliation :	
First Name :	Mary
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State :	HI
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Email :	mlynnem@hotmail.com
Telephone :	
Telephone Extension :	
Add to Mailing List :	Email
Submission Method :	Website
Other Submission Method :	
Submission Date :	02/02/2009
Submission Content/Notes :	Have you ever considered having the rail pre-fabricated and shipped here? Seems that in the long run it would be cheaper, and use a company that already knows how to build a system. Here it takes forever to get the Ft Weaver Road widened..first it is this and that, then bankrupt company, then out to new bid. Get it from the mainland and pay the premium if they finish early like the Minnesota bridge. Here it seems that the longer it takes to complete the better; just ship it and put it together. It would still mean jobs here and the completion time would be much faster.

DEPARTMENT OF TRANSPORTATION SERVICES

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-334412

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

Dear Ms. Avenido:

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

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

To address your comment, the proposed segmental construction method (see Final EIS Appendix E, Construction Approach) maximizes the amount of work that can be completed off-site, with delivery and erection of pre-cast segments. Contractors will determine the most efficient location to cast the individual segments.

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

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
Creation Date :	12/26/2008
Creator Affiliation :	
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State :	HI
Zip Code :	96818
Email :	chuyang@hawaii.edu
Telephone :	
Telephone Extension :	
Add to Mailing List :	Email
Submission Method :	Website
Other Submission Method :	
Submission Date :	12/26/2008

Submission Content/Notes : Here are my suggestions

1. We should start building the rail from East Kapolei instead of from town because the purpose of the rail is to reduce the traffic congestion on the island. If more people take the rail to town, that will not only reduce the traffic congestion from the more and more densely populated Kapolei, Waipahu and Eva areas, it will also relief the traffic jam in town. But if we start building it in town, people still have to drive to town to work. That doesn't really solve the traffic problem at all. We don't have to follow suit of other cities, we need to look at where the problems are on this island.

2. The rail should go through Salt Lake instead of the airport. The purpose of the rail is to serve the residents on the island, not tourists. Salk Lake area has a lot of female workers who don't drive, they rely on the bus to commute to work. If the rail goes through Salt Lake, the ridership will probably be higher than in any other areas.

Who will use the rail more? Or how can the rail be used more efficiently? The tourists who come for a visit and travel from the airport to downtown or the residents in Salt Lake who commute everyday to work?

Beside that, if the rail goes through the airport and the tourists take the rail to downtown or Waikiki, how many taxi drivers, travel agencies and car-rental companies will loose their jobs?

In a word, the rail will mostly be paid by the tax payers living on this island; serving the residents should be the priority and the primary purpose of building the rail, not the tourists, who come for visit maybe once in a year or maybe once in a life time.

Reply Requested : Yes

Submission Type : Draft EIS Comment

DEPARTMENT OF TRANSPORTATION SERVICES

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-332257

Ms. Chuyang Baideme
955 Ala Lilikoi Street
Apartment 804
Honolulu, Hawaii 96818

Dear Ms. Baideme:

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

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

Your support of the construction phasing has been noted. As described in Section 2.5.10, Project Phasing, and further in Section 8.6.9, Construction Phasing, in the Final EIS, to support phased opening, the first construction phase must be connected to a maintenance and storage facility, which requires considerable space. The first phase of the Project must be connected to the maintenance and storage facility because, in addition to maintenance of equipment and ongoing operations, the maintenance and storage facility houses the main control center for the entire Project, and the required testing and operation of the system could not be completed without access to it. No location has been identified closer to Downtown with sufficient available land to construct a maintenance and storage facility. Therefore, construction will begin between East Kapolei and Leeward Community College. The Project will be constructed in phases to accomplish the following:

- *Match the anticipated schedule for right-of-way acquisition and utility relocations*

- *Reduce the time that each area will experience traffic and community disturbances*
- *Allow for multiple construction contracts with smaller contract size to promote more competitive bidding*
- *Match the rate of construction to what can be maintained with local workforce and available financial resources*
- *Balance expenditure of funds to minimize borrowing*

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

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

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

As discussed in Chapter 3, Section 3.4.2, 9,900 visitors will use the fixed guideway daily, of which 1,800 are to or from the airport. As seen, the Airport Alternative primarily serves residents.

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

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
Creation Date :	11/20/2008
Creator Affiliation :	
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Telephone Extension :	
Add to Mailing List :	None
Submission Method :	Website
Other Submission Method :	
Submission Date :	11/20/2008
Submission Content/Notes :	I highly support a rail system and the airport route. I think it'll be easier to get tourists to not rent a car and use rail, than to get Salt Lake residents to stop using their car to use rail. Hawaii is expensive enough to visit, so tourists are trying to cut their vacation costs wherever they can. I see tourists on the bus every morning (while I'm commuting to downtown) heading to the airport of Arizona Memorial or the Swap Meet. These tourists don't want to rent a car and pay $20/day to park it at their hotel. I don't think rail should only cater to tourists, but I think tourists will adapt to using the system a lot faster and appreciate it and reward us financially for it. Then hopefully, the residents will get of their own cars and follow!

DEPARTMENT OF TRANSPORTATION SERVICES

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

February 16, 2010

RT9/09-330555

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

Dear Ms. Barker:

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

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

Your preference for the Airport Alternative has been noted. While each of the alternatives includes trade-offs between benefits and impacts, the Airport Alternative from East Kapolei to Ala Moana Center has been selected as the Preferred Alternative. The identification of the Airport Alternative as the Preferred Alternative was made by the City to comply with FTA's NEPA regulations that state that the Final EIS should focus on the Preferred Alternative (23 C.F.R. § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative, public input on the Draft EIS, and City Council Resolution 08-261 identifying the Airport Alternative as the Project. The selection of the Airport Alternative is described in Chapter 2 of this Final EIS. The discussion of the alternatives considered is included in Chapter 2 of this Final EIS and the Alternatives Analysis. As discussed in Section 3.4.2 of this Final EIS, the Airport Alternative will carry the most passengers with 116,000 daily passengers and 282,500 daily trips in 2030, thereby resulting in the greatest transit-user benefits. The Airport Alternative will also result in the fewest vehicle miles traveled and vehicle hours of delay,

as well as provide access to major employment areas, including Honolulu International Airport, that will have substantially greater ridership than the other alternatives considered.

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

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

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Status :	Initial Action Needed
Creation Date :	12/6/2008
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Telephone :	235-0423
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Submission Method :	Website
Other Submission Method :	
Submission Date :	12/06/2008

Submission Content/Notes : December 6, 2008

Department of Transportation Services
City and County of Honolulu
650 S King St, 3rd Floor
Honolulu, HI 96813

RE: Rail related routing of the proposed fixed Rail System

Dear Sirs:

This concerns the inquiry into a feasibility review for the proposed fixed Rail System. If we must have rail, I suggest that the preferred rail alignment be the existing 40 feet rail road right-of-way. This entails the Dillingham's OR&L right-of-way from the old Iwilei Train Station to the Leeward coast of Waianae.

Routing of the rail system through out the Ewa Plains (Kapolei-Aiea) could then be constructed at ground elevation as a possible alternative verses a costly elevated system.

The rail system should also service the Honolulu Airport Terminals which will enhance rail ridership. Please note that the lack of ridership of the elevated rail system in the City of Las Vegas does not serve the McCarran International Airport and is now under consideration.

Further consideration is requested for your planning review for a proposed bridge over the Ala Wai canal extending University Avenue into Waikiki. The bridge primarily will be used for pedestrians and to include a bus/trolley service or possibly a state of the art light rail system usage linking Waikiki/Moiliili/UH Manoa school campus (i.e. Ft. DeRussy's Kuroda Field – UH Campus).

I champion the involvement of a planning team undertaken by the UH Engineering students/faculty for the development of the conceptional design for this task and to also include the overall beautification design implementation of the much needed University Avenue.

Respectfully,

S. Batuia
Kaneohe resident
45-247 Kulauli St.
Kaneohe, HI 96744

c: Charles K. Djou
City Councilman

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-331287

S. Batula
45-247 Kulauli Street
Kaneohe, Hawaii 96744

Dear S. Batula:

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

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

As described in Chapter 2 of the Draft EIS, several alignments were evaluated during the Alternatives Analysis process. One evaluated alignment was the historic OR&L line. A combination of issues, including utilities that have been placed in the right-of-way, poor location in several places, and the previous loss of the right-of-way in several locations, all contributed to the elimination of that option.

The Alternatives Screening Memorandum (DTS 2006a) recognized the visually sensitive areas in Kakaako and Downtown Honolulu, including the Chinatown, Hawaii Capital, and Thomas Square/Honolulu Academy of Arts Special District. To minimize impacts on historic resources, visual aesthetics, and surface traffic, the screening process considered 15 combinations of tunnel, at-grade, or elevated alignments between Iwilei and Ward Avenue. Five different alignments through Downtown Honolulu were advanced for further analysis in the Alternatives Analysis, including an at-grade portion along Hotel Street, a tunnel under King Street, and elevated guideways along Nimitz Highway and Queen Street (Figure 2-4).

The Alternatives Analysis Report (DTS 2006b) evaluated the alignment alternatives based on transportation and overall benefits, environmental and social impacts, and cost considerations. The report found that an at-grade alignment along Hotel Street would require the acquisition of more parcels and could potentially affect more burial sites than any of the other alternatives considered. The alignment with at-grade operation Downtown and a tunnel under King Street, was not selected because of the environmental effects, such as impacts to cultural resources, reduction of street capacity, and property acquisition requirements of the at-grade and tunnel sections, which would cost an additional $300 million.

The Project's purpose is "to provide high-capacity rapid transit" in the congested east-west travel corridor (see Section 1.7 of the Final EIS). The need for the Project includes improving corridor transit mobility and reliability. The at-grade alignment would not meet the Project's Purpose and Need because it could not satisfy the mobility and reliability objectives of the Project (see bullets below). Some of the technical considerations associated with an at-grade versus elevated alignment through Downtown Honolulu include the following:

- ***System Capacity, Speed, and Reliability***—*The short, 200-foot (or less) blocks in Downtown Honolulu would permanently limit the system to two-car trains to prevent stopped trains from blocking vehicular traffic on cross-streets. Under ideal operational circumstances, the capacity of an at-grade system could reach 4,000 passengers per hour per direction, assuming optimistic five minute headways. Based on travel forecasts, the Project should support approximately 8,000 passengers in the peak hour by 2030. Moreover, the Project can be readily expanded to carry over 25,000 in each direction by reducing the interval between trains (headway) to 90 seconds during the peak period. To reach a comparable system capacity, speed, and reliability, an at-grade alignment would require a fenced, segregated right-of-way that would eliminate all obstacles to the train's passage, such as vehicular, pedestrian, or bicycle crossings. Even with transit signal priority, the at-grade speeds would be slower and less reliable than an elevated guideway. An at-grade system would travel at slower speeds due to the shorter blocks, tight and short radius curves in places within the constrained and congested Downtown street network, the need to obey traffic regulations (e.g., traffic signals), and potential conflicts with other at-grade activity, including cars, bicyclists, and pedestrians. These effects mean longer travel times and far less reliability than a fully grade-separated system. None of these factors affects an elevated rail system. The elevated rail can travel at its own speed any time of the day regardless of weather, traffic, or the need to let cross traffic proceed at intersections.*

- ***Mixed-Traffic Conflicts***— *The Project will run at three minute headways. However, three-minute headways with an at-grade system would prevent effective coordination of traffic signals in the delicately balanced signal network in downtown Honolulu. A disruption of traffic signal cycle coordination every three minutes would severely affect traffic flow and capacity of cross-streets. Furthermore, there would be no option to increase the capacity of the at-grade rail system by reducing the headway to 90 seconds, which would only exacerbate the signalization problem. An at-grade system would require removal of two or more existing traffic lanes on affected streets. This effect is significant and would*

exacerbate congestion. Congestion would not be isolated to the streets that cross the at-grade alignment but, instead, would spread throughout Downtown. The Final EIS shows that the Project's impact on traffic will be isolated and minimal with the elevated rail, and, in fact will reduce system-wide traffic delay by 18 percent compared to the No Build Alternative (Table 3-14 in the Final EIS). The elevated guideway will require no removal of existing through travel lanes, while providing a reliable travel alternative. When traffic slows, or even stops due to congestion or incidents, the elevated rail transit will continue to operate without delay or interruption.

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

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

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

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

The Project has logical termini at East Kapolei and Ala Moana Center and independent utility from any extensions that may be constructed in the future. The proposed future extensions to West Kapolei, Salt Lake Boulevard, Waikiki, and UH Manoa are discussed in the cumulative impacts sections of Chapters 3 and 4 of this Final EIS. However, the future extensions are not part of this Project, thus they are not required to be evaluated under Chapter 343 of the Hawaii Revised Statutes and NEPA. Under NEPA, environmental analysis is only required when there is a proposed action by a Federal agency. Here, because the future extensions are not proposed for implementation at this time, they are not part of the Project studied in this Final EIS. It would be premature to undertake an environmental analysis of the extensions (beyond the cumulative impacts analysis) because they are not part of the proposed action to be taken by the City and FTA. If the future extensions are proposed for implementation in the future, environmental analysis of the extensions and appropriate alternatives will be undertaken at that time. Bus service between Ala Moana Center and Waikiki and UH Manoa will be enhanced until those extensions are built. University of Hawaii students have participated in several project planning activities. However, the Project terminates at Ala Moana Center and will not affect University Avenue.

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

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

From: Ted.Matley@dot.gov [mailto:Ted.Matley@dot.gov]
Sent: Thursday, January 22, 2009 1:40 PM
To: Miyamoto, Faith
Subject: FW: Proposed Honolulu Rail Project

From: Nicholas C. Bleecker [mailto:ncbleecker@earthlink.net]
Sent: Saturday, December 27, 2008 12:29 PM
To: Matley, Ted <FTA>
Subject: Proposed Honolulu Rail Project

Mr. Ted Matley FTA Region IX 201 Mission Street, Suite 1650 San Francisco, CA 94105

Dear Sir,

These comments are in regard to the DEIS for the proposed elevated fixed rail system for Kapolei to Honolulu.

The original justification made for a fixed rail system was that it would "solve" our problems of traffic congestion that occur on H1 principally during the morning and afternoon commute times. When it was reported that this plan would do very little for traffic, the justification given to the public for why it was "needed" was changed to allege our need for an "alternative" to driving or using the bus system. Later, during the campaign to push the project to voters, the "need" for the the public to support the project was centered around its supposed beneficial "boost" to our local economy. When funds come into our local economy from outside then a "multiplier effect" might provide a modest boost to our economy. In this case, the overwhelming majority of funding comes from the pockets of local residents. There is no boost except to the few citizens who will feed from the public trough. The promotional campaign launched prior to the November referendum was heavily financed by both the unions and taxpayer money under the guise of an "information" program from the Mayor's office. Many citizens who do not support the project are upset at the blatant way in which the City Administration: 1. did everything it could to prevent the Stop Rail Initiative from even getting on the ballot, 2. spent taxpayer funds to clearly promote the project with misleading and incomplete information about it under the guise of an "informational campaign", and 3. suppressed the negative facts contained in the DEIS until two days before what turned out to be a very close election. The voters were hoodwinked about the supposed benefits of this project through a very deceptive yet slick advertising blitz.

Among the new facts that came out in the final hours before voters were able to cast their vote on the project included the increased price tag for rail. The public had been fed a steady diet of propaganda that always used a much lower figure (if $3.7 billion can be considered "low"). The City has been successful in dismissing concerns about the costs for this project that will fall upon Honolulu's residents. The increase in the excise tax is seen as mostly invisible by most people even though it represents the largest transit tax imposed on individuals of any state and is also one of the most regressive methods of raising tax money, causing more distress upon lower incomes (if "invisibly"). The cost of living here has become even higher than it already was. It will become higher yet because of this project and because of the perpatual operating subsidy it will require.

These cost figures for the rail project are just estimates, of course. They significantly lag behind current realities. To the

degree that economic conditions are volatile the figures will be unreliable. Add to that the fact that the figures are prepared and cleared by the same self serving entities that may profit in one way or another due to the incestuous relationships of consultants, contractors and public figures involved. Finally there is the undeniable fact that no large public project in Hawaii has ever come in even remotely close to budget . An extra billion here. An extra billion there. Pretty soon it starts to add up to big money.

And how's that tax collection going? Not too well. World events transpired to reduce the take of this "invisible", and therefore seemingly painless, tax. Revenues are not keeping up with projections. Read the national news. It will get worse. And Hawaii's economy is not immune to the coming deep and prolonged recession. Residents here will suffer along with the rest of the world. Does this seem like a good time to burden us with the exorbitant costs of the most expensive rail transit project, per resident or per mile in the country? One that accomplishes so little?

Who would think so? Well, of course the giant mainland contractors who would profit from us to build it, of course. They have spent considerable money themselves to promote the project and to contribute generously to politicians who also support it. Those politicians thus have a personal interest in pushing the project for the benefit to their campaign coffers and to gain influence with the powerful unions who have a notoriously short sighted view of what is good for Hawaii. Basically, the unions use all their significant clout to support any large project that would funnel jobs to their members regardless of its merits or cost to taxpayers. The construction unions spent heavily before the election to influence the voters to approve the project. The big money spent to inundate the public with slick ads in the newspapers and relentless radio and television advertising for rail by the City and these others succeeded in deceiving just enough voters for a narrow victory to proceed with the project. Because of the understated costs and decreased revenues the need for additional tax increases and/or property tax increases in the future to prop up this project is obvious, and yet neither the City Administration nor the City Council has been forthcoming about this inevitability.

Beyond the cost or our ability to pay, this rail project is a very bad idea. As noted above, it will offer little relief to drivers on Oahu. Relatively few citizens use the existing bus mass transit system today. It is speculative to assume vastly more will use this new system that relies on feeder buses and is so limited in whom it would serve and where it would go. The predictions of time saved by the average commuter using rail over what could be achieved with express buses in dedicated lanes on H1 are negligible. The differences in costs of the two systems are huge. Further, once we have committed public resources to pursue rail, all other potential solutions will be foreclosed and future advances in technologies removed from consideration for Oahu. We will be stuck with a completely rigid and antiquated system for a very, very long time.

The alternatives to rail were never seriously considered. The fix was in for steel on steel fixed rail from the beginning. For example, the proposal for dedicated lanes for buses that was considered involved the taking of an existing lane away from drivers on the H1 and so was rejected as causing more congestion. They never reviewed a plan for dedicated lanes built separately and in addition to existing lanes. Cost of a separated HOV lane were inflated by assuming it needed to be elevated for the entire twenty miles to Kapolei and not considering an express bus system employing a much shorter elevated section that would simply go around or over highway bottlenecks. Other potential improvements to express bus systems were summarily dismissed, as were ideas involving strategic bypasses around the two major choke points on the H1. Major improvements to the H1 are sorely needed, and are not impossible, but would be under the purview of the State, not the City. Improvements to highways and an improved express bus system could serve the interests of the entire island, not just a tiny sliver of the population that might actually use the rail to Kapolei.

Elevated rail will be hideous, cutting through town near the waterfront and dissecting mauka / makai view planes, and noisy, with trains screaming by every three minutes night and day. This will be bad for tourism. When visitors see that Honolulu looks and sounds just like other mainland cities that are much, much larger they will see Honolulu as an urban environment, not a tropical one. They will travel to other destinations in the Pacific. Our economy will further suffer. This is why the Waikiki Improvement Association is opposed to elevated rail being run into Waikiki.

So the benefits for Honolulu of rail are skimpy and overstated and its downside is huge. Why is it being so doggedly pushed? Because it is basically nothing more than a development scheme. It is not about mass transit. It is all about the building of TODs out in what are now empty cane fields along the route. The City is preparing to give developers lucrative tax breaks and zoning exemptions to lure development. It is viewed as an opportunity for creating density where none exists by the entities listed above. It is interesting to note that one of the stations listed in the plan will stop in an empty field because the proposed development there has been withdrawn due to the current economic situation.

Starting the line out at Kapolei and building it in towards town is ludicrous. In twenty years people in Kapolei may possibly be able to ride it as far as Wahiawa? How is that going to help commuters or traffic conditions on the H1? Relief is needed by residents for traffic conditions near Honolulu. This project does little to alleviate traffic on the H1. Its truly outrageous cost is not justified by its sparse benefits to the island's residents. The elevated fixed rail being proposed for this beautiful city is not what we need or can afford. More imaginative solutions are called for, solutions centered around mass transit, not development of TODs. The plan, as it is now, is saturated with inefficiencies and has the very real possibility of being disastrous for Honolulu's citizens and the city itself.

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-334320

Mr. Nicholas C. Bleecker
ncbleecker@earthlink.net

Dear Mr. Bleecker:

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

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

Chapter 1 of the Final EIS discusses the Purpose and Need of the Project. The Project is intended to provide faster, more reliable public transportation service in the study corridor than can be achieved with buses operating in congested mixed-flow traffic, to provide reliable mobility in areas of the study corridor where people of limited income and an aging population live, and to serve rapidly developing areas of the study corridor. The Project also will provide additional transit capacity and an alternative to private automobile travel, as well as improve transit links within the study corridor. Implementation of the Project, in conjunction with other improvements included in the Oahu Regional Transportation Plan, will moderate anticipated traffic congestion in the study corridor.

The fixed guideway system will decrease traffic congestion. As shown on Table 3-9 in the Final EIS, volumes on the H-1 Freeway at the Kalauao Screenline will decrease during the a.m. peak hour with the addition of the fixed guideway system. This table shows 2,250 vehicles per hour (vph) will access the H-1 Freeway in the Koko Head-bound direction during the a.m. peak hour under 2030 No Build conditions. However, this number decreases to 11,260 vph with the addition of the fixed guideway system. This improvement addresses the first goal of the Project identified in Chapter 1 of the Final EIS, to improve corridor mobility.

In addition, the fixed guideway system will provide a reliable transportation option because it will operate in an exclusive right-of-way. The reliability will not deteriorate over time, even with projected population growth in the study corridor. This feature of the fixed guideway system addresses the second goal of the Project identified in Chapter 1 of the Final EIS, to improve corridor travel reliability.

The comment about the multiplier effect of construction dollars does not account for the fact that the funding is from "new" funding sources. These are funds that would not have been raised at all by local residents or others without the Project. Moreover, a substantial portion of the funds comes from the Federal government, and over 30 percent of the General Excise and Use Tax (GET) surcharge is paid by tourists and other off-island participants in the economy.

Regarding your comments about the November 2008 election, no election-related advertising was funded by the City and County of Honolulu. The NEPA process is unrelated to any electoral processes.

Your comments regarding finances for the Project are noted. As noted in Chapter 6 of the Final EIS, the Project is based on a financial plan that balances anticipated revenues with costs. This Chapter presents the $3.5 billion current estimate of GET surcharge revenues and discusses uncertainties associated with the estimate. Revenues would be from the GET Surcharge and Federal funding from FTA Section 5307 and the FTA Section 5309 New Starts funds. GET collections have been lower than anticipated, but the plan is based on several years, which allows for ups and downs in the economy over the course of the collection period. Short-term trends can be accommodated within a range that keeps total revenue at a high enough level to cover the Project's construction costs. Additionally, the financial plan has been updated since the Draft EIS and takes into account the economic downtown. Operating costs that are not covered by fare collections will be funded from the same sources that fund TheBus: Federal funding and subsidy from the City's General and Highway Funds.

As also stated in Section 3.3.2 of the Final EIS, TheBus system serves more than 80 percent of Oahu's developed areas and has about 252,200 boardings on an average weekday. Honolulu has the fourth highest load factor (in terms of bus passenger trips per revenue hour) for bus service in the U.S. TheBus has the highest per capita ridership of any system in the U.S. without a rail system. It is a very well-used system and provides a good indication that ridership forecasts for the fixed guideway are reasonable.

As identified in Section 3.2.1 of the Final EIS, transit ridership forecasts for rail and bus service are based on a travel demand forecasting model used by the Oahu Metropolitan Transportation Organization (OahuMPO) for the Oahu Regional Transportation Plan. The OahuMPO model is based on "best practices" for urban travel models in the U.S. The model is updated approximately every five years to reflect changes in land use, socioeconomic conditions, and transportation network improvements. The model is approved by the OahuMPO Technical Advisory Committee. As indicated in the Final EIS, this modeling approach has proven to be effective in estimating ridership levels in other areas such as Los Angeles County, Salt Lake City, and the Denver region in the last 10 years. This model is based on guidelines established by the FTA. Comments about the speculative nature of the ridership projections and the increase in transit usage are inconsistent with the findings of the studies in Honolulu to date, as noted in Chapter 3 of the Final EIS, and experiences in other communities with recent rail openings, such as in Phoenix.

In addition, Chapter 3 of the Final EIS details the benefits of the Project in terms of travel time and congestion reduction. As shown in Figures 3-5 and 3-7 in the Final EIS, there will be significant transit travel-time benefits, even for areas not directly served by the fixed guideway. As shown in Table 3-14 in the Final EIS, congestion, as measured in vehicle hours of delay, will decrease 18 percent with the Project compared to No Build conditions.

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

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

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

You also commented on the visual aspects of the Project. The island's unique visual character and scenic beauty was considered in the visual and aesthetic analysis presented in the Draft and Final EISs. As discussed in Section 4.8 of the Final EIS, the Project will be set in an urban context where visual change is expected and differences in scales of structures are typical. The following measures will be included with the Project to minimize negative visual effects and enhance the visual and aesthetic opportunities that it creates:

- *Develop and apply design guidelines that will establish a consistent design framework for the Project with consideration of local context.*
- *Coordinate the project design with the City transit-oriented development (TOD) program within the Department of Planning and Permitting.*
- *Consult with the communities surrounding each station for input on station design elements.*

- *Consider specific sites for landscaping and trees during the Final Design phase when plans for new plantings will be prepared by a landscape architect. Landscape and streetscape improvements will mitigate potential visual impacts.*

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

A goal of the Project is to improve access to planned development to support City policy to develop a second urban center. As discussed in Section 4.19.2, Indirect Effects of the Final EIS, it is not expected that the Project would lead to an increase in the overall level of growth allowed or expected in the study corridor. Rather, it would focus the growth into patterns that would increase the number of viable travel mode options available to corridor residents and employees, including transit, walking, and bicycling. As an additional benefit, compact TOD would reduce the cost of providing utilities, facilities, and services to new residential and commercial developments. TOD is a planning model that works to create a pedestrian-friendly, mixed-use community that encourages people, including residents, workers, and visitors, to drive cars less and ride transit more. TOD provides options to an automobile-dependent lifestyle, and it encourages smart growth because it focuses development around transportation options. This encourages people to walk and, perhaps best of all, to have goods, services, and access to rail all in one location, which can simplify life.

Your letter also commented on the phasing of the Project. As described in Section 2.5.10, Project Phasing, and further in Section 8.6.9, Construction Phasing, in the Final EIS, to support phased opening, the first construction phase must be connected to a maintenance and storage facility, which requires considerable space. No location has been identified closer to Downtown with sufficient available space to construct a maintenance and storage facility. Therefore, construction will begin between East Kapolei and Leeward Community College. The Project will be constructed in phases to accomplish the following:

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

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

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

Lastly, as stated previously, traffic conditions on the H-1 Freeway will improve as a result of the Project.

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

Very truly yours,

WAYNE Y. YOSHIOKA
Director

RT12/08-292445

Honolulu High-Capacity Transit Corridor Project

Welcome to the Honolulu High-Capacity Transit Corridor Project's Public Hearing for the Draft Environmental Impact Statement/Section 4(f) Evaluation.

This public meeting and hearing has been designed to inform the public about the transit project, explain materials contained in the Draft EIS, answer questions from the public, and collect public input on project issues related to the Draft EIS, Section 106 of the National Historic Preservation Act, Section 4(f) of the U.S. Department of Transportation Act, and floodplains affected by the project.

DEC 31 AM 9:47 DTS RAPID TRANSIT

Please review the project information and ask project staff any questions about the project that you might have. The Draft EIS is available on the project website at www.honolulutransit.org.

You may provide official comments in several ways. Here at this Public Hearing you may provide oral comments to a court reporter who will record them for the record or use this form to provide written comments. After the meeting, you may provide an on-line comment at www.honolulutransit.org or use this form to send a written comment to the Department of Transportation Services. All comments must be postmarked or received by January 7, 2009 in order for them to be included in the Final EIS.

Name: Joanna Boyette Address: 4336 Laakea Street

Phone: (808) 221-4474 Honolulu, Hawaii

E-mail: — 96818

Comment(s):

I live on Laakea Street in Foster Village. This street is parallel to Salt Lake Boulevard and directly across from Radford High School. I have lived in the same house on Laakea Street since my parents moved here in 1967 when I entered the fourth grade. At that time nothing was in-between Foster Village and the Aiea Shopping Center but a rough road and a few run down houses. Since then we have been surrounded by Makalalpa Elementary School, the Stadium Marketplace, Stadium Mall, Halawa Valley Estates, Alii Plantation, the Aloha Stadium, Crosspointe subdivision, and CONSTANT noise from both the H-1 Freeway and Kamehameha Highway. From the front of my house looking toward Salt Lake Boulevard and Radford High School I can count 23 telephone and electricity wires strung across my view. I absolutely do not want the proposed rail to be anywhere near Salt Lake Boulevard. I do not live close enough to either of the proposed stations along Salt Lake Boulevard for it to be advantageous to me. It would still be faster to hop in my car and get to down town within 15 to 20 minutes. I do not want to hear constant rail traffic from 4 am to 12 pm each and every day. I do not want my property value to go down and other taxes to go up because of the rail. I do not want to exit my house and see the rail structure almost in my front yard; I would rather see all of the phone and power lines. I have learned to ignore them but could never learn to ignore that massive rail system looming above my neighbor's houses and blocking what portion of the mountains I can still see. I do not look forward to having Salt Lake Boulevard torn up again and ruined forever by the rail structure running down the whole length of it. I say NO to the Salt Lake Boulevard route and YES to the Airport/Nimitz route.

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT12/08-293445R

Ms. Joanna Boyette
4336 Laakea Street
Honolulu, Hawaii 96818

Dear Ms. Boyette:

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

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

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

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

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

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
Creation Date :	12/1/2008
Creator Affiliation :	
First Name :	David
Last Name :	Bremer
Business/Organization :	
Address :	
Alternative Preference :	
Apt./Suite No. :	
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Telephone :	
Telephone Extension :	
Add to Mailing List :	None
Submission Method :	Website
Other Submission Method :	
Submission Date :	12/01/2008
Submission Content/Notes :	For the proposed LCC fixed guideway station, there is no pedestrian access for communities within walking distances less than a mile from the station. These include Waikele, Waipahu, and Seaview.

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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

MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

February 16, 2010

RT9/09-330992

Mr. David Bremer
bremerd001@hawaii.rr.com

Dear Mr. Bremer:

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

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

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

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

Very truly yours,

WAYNE Y. YOSHIOKA
Director

From: Yoshioka, Wayne [wyoshioka@honolulu.gov]
Sent: Saturday, February 07, 2009 12:02 PM
To: Yadao, Elisa; Nishioka, Edward M.
Cc: Miyamoto, Faith; Hamayasu, Toru; Thom, Sharon Ann; Stoeck, Lynette
Subject: FW: Honolulu Draft EIS comments
Importance: High
Attachments: 0_1776_2010_000Aaa_DEISresponse.doc

Aloha auinala!

This arrived after the 2/6/09 deadline. I'm still forwarding for your records.

A hui hou,

Wayne

From: JimBrewer ReneeIng [mailto:jimbrewer_reneeing@yahoo.com]
Sent: Saturday, February 07, 2009 12:00 AM
To: jimbrewer_reneeing@yahoo.com
Cc: Yoshioka, Wayne; Mr. Ted Matley
Subject: Honolulu Draft EIS comments

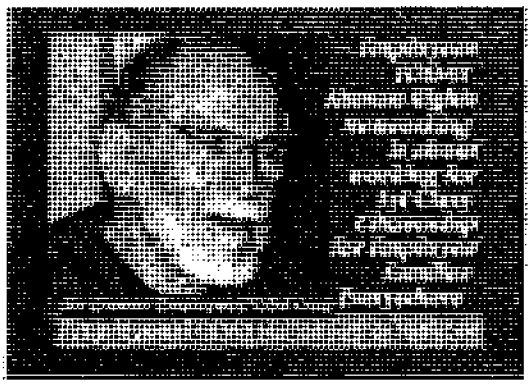
Dear Sirs,

Attached are my DEIS comments.

Aloha.

Jim Brewer

2/10/2009



Department of Transportation Services
City and County of Honolulu, 650 South King Street
3rd Floor, Honolulu, HI 96813

February 6, 2009

ALOHA,

These comments, following a few prefatory remarks, are submitted in accordance with the instructions from your DTS websites as indicated below.

I and my life partner and spouse, Renee Ing, have been public policy advocates and educators working to serve "the needs, hopes and dreams of Hawaii's Employee Families" for more than thirty (30) years.
Renee Ing retired from the City and County of Honolulu' Department of Parks and Recreation after thirty-three (33) of service to various communities.
I am a partially disabled U.S. Navy veteran, serving first in the amphibious navy, then two (2) years (1958-1960) on an admiral's staff in the Philippines—maintaining central classified files and then working in the staff legal office; and, after that, serving on the front lines of the Cold War in nuclear-powered Polaris fleet intercontinental ballistic missile submarines. My last submarine duty was aboard the USS Kamehameha (SSBN642). I am living my seventieth (70th) year of life and serving the 16th year as executive producer, editor and co-host of the public access television program—***Employees*TODAY, cable channel 54, Sundays at 5-6pm.**

The following comments are submitted per the cut-and-pasted instructions enclosed within the following brackets: (this e-mailed copy contains typo-corrections as well as amendments designated in blue ink below)

[http://www.honolulutransit.org/

Making a Comment—The comment period for the project's Draft Environmental Impact Statement has been extended to February 6, 2009. During this period, comments on the Draft EIS will be accepted via:

- In writing to the Department of Transportation Services, 650 South King Street, 3rd Floor, Honolulu, Hawaii 96813. Comments must be received or postmarked by February 6, 2009.
- By clicking the "Contact Us" tab or this link.

The public comment period is mandated by federal and state laws. All comments received will be considered as the Final is prepared by the FTA and the City. Relevant comments will be responded to in writing.

http://www.honolulutransit.org/contact/

Comments or Input About the Project

For online comments on the Draft EIS, please use the form below. Comments can also be sent to the Department of Transportation Services, City and County of Honolulu, 650 South King Street, 3rd Floor, Honolulu, HI 96813. Please include your name, address, telephone number and, if applicable, your organization or business whether you submit comments online or in writing.

Comments on the Draft EIS must be **postmarked or submitted in person or via this website by February 6, 2009.**

You may also use the form below for any other question, comment, or suggestion about the Project as well. Mahalo.
[* Required Fields]

Would you like to be added to our mailing list?
Please specify your preference:
☒ Both ☐ Email ☐ Standard ☐ None

My comments and input about the Draft EIS for the Honolulu High-Capacity Corridor Project follow:

1. This is a thoroughly incomplete and misleading document. It offers Steel-on-Steel Rail and a ridiculous straw man of "No Build," as so-called "alternatives." One choice or nothing is absurd. This however is a very honest statement. There was only one choice from the very beginning.

2. This document should have examined and evaluated the rubber-tire-on-concrete automated bi-modal magnet-guided Virtual Rail/Super-Bus Rapid Transit (i.e., the Phileas Advanced Public Transport System), Urban Maglev—as opposed to Inter-City heavy bullet train-type MagLev (magnetic-levitation), and Mono-Rail,; as well as, Steel-on-Steel (SOS) Light and Heavy Urban Rail. This should have been done with the benefit of concrete and specific proposals requested officially by the City and County.

3. This DEIS document is the product of a several year campaign to impose on the people of O'ahu a predetermined Washingtoo, D.C.-style Steel-on-Steel Rail "Public Works Project;" with a slight Bridge-to-Nowhere make-work smell to it.
This was done with only a façade of democratic public input. That was abundantly clear as the process proceeded; to those who were following the issue. You would hear this sentiment expressed all along the way at Council hearings, public meetings and elsewhere; which, by-the-way were not "informational" as described by FTA guidelines; but really Steel-On-Steel sales jobs evidently paid for with federal and local taxpayer money. **Is this not illegal? If not, it should be. If so, should the FTA not look into this matter?**
4. I refer to a slight smell of "bridge-to-nowhere" because of the extravagant cost of Steel-on-Steel (SOS). I am as convinced as anyone that we definitely need this elevated public rapid transit fixed guideway corridor project. However, I am convinced that a Phileas-like system is, by-far, the most affordable, cost-effective, flexible and future-adaptable system for O'ahu. (see this web address—
http://etmag.homestead.com/AboutPhileasMagnetRailSuperExpress.html)
All of this is especially relevant on this day (February 6, 2009) when I heard one economist on TV refer to America's economic crisis as a "depression" instead of recession.
[We are going to have to learn to live within our means as was the case in the late 1930s when I was born. We simply cannot pay the extravagant price being asked for this particular kind of urban rail (SOS)—which has been caught up with; and, is now, for instance, beginning to be left behind by automated magnetically and electronically-guided hi-tech BRT—fully automated BRT that can do everything urban steel rail can do; and, increasingly more so.]

5. I ask that we reconsider where we are now; and, in the spirit of consensus which was not seen in the 51% vote for SOS in November, 2009. Even then, when the fact of the long recession/depression had not yet sunk in, the poll conducted before the election showed 59% of O'ahu residents wanted "rail;" but 55% said that SOS was too expensive.

So, let's step back and take careful measure of everything with another DEIS. One that is informed and prompted by the realization of a radically changed recession/depression economy. A DEIS that will enable an unbiased procurement process to choose most prudently what will be best for the citizens of O'ahu among every "alternative" urban rail technology making their proposals and then re-look at them with new eyes.

Mahalo,

James R.Brewer, Jr.
P.O. Box 23403
Honolulu, Hawaii 96823-3403

DEPARTMENT OF TRANSPORTATION SERVICES

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DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

KENNETH TORU HAMAYASU
DEPUTY DIRECTOR

June 11, 2010

RT2/09-299096R

Mr. Jim Brewer
P.O. Box 23403
Honolulu, Hawaii 96823-3403

Dear Mr. Brewer:

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

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

As discussed in Chapter 2 of the Final EIS, additional alternatives, including other technologies, including Mag-lev and the Phileas system, were evaluated during the Alternative Analysis phase of the Project. The Alternatives Analysis phase evaluated a range of transit mode and general alignment alternatives in terms of their costs, benefits, and impacts relative to their ability to meet the Purpose and Need for the Project.

First, beginning in the fall of 2005, an initial screening process considered alternatives identified through previous transit studies, a field review of the study corridor, an analysis of current population and employment data for the study corridor, a literature review of technology modes, ongoing work completed as part of the Oahu Regional Transportation Plan 2030 (ORTP) prepared by the Oahu Metropolitan Planning Organization (OahuMPO) (OahuMPO

2007), and public and agency comments received during the formal Alternatives Analysis scoping process.

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

After completion of screening in the winter of 2006, the following alternatives were studied in the Alternatives Analysis: No Build Alternative, Transportation System Management (TSM) Alternative, Managed Lane Alternative, and the Fixed Guideway Alternative. After review of the Alternatives Analysis Report and consideration of public comments, the City Council selected a fixed guideway transit system extending from Kapolei to UH Manoa with a connection to Waikiki as the Locally Preferred Alternative. The selection, which eliminated the TSM and Managed Lane Alternatives, became Ordinance 07-001 on January 6, 2007. The fixed guideway system is the most cost-effective of all the alternatives studied. Less expensive options would not have improved system performance. The NEPA process considered a range of alternatives that were consistent with the identified Locally Preferred Alternative. The minimum operable segment or the "Project" was defined based on available funding and logical termini for the preparation of the EIS.

As stated in Section 2.2.3 in the Final EIS, the NEPA Notice of Intent published in March 2007 requested input on five transit technologies. A technical review process which occurred during development of the Draft EIS included the opportunity for public comment and was used in parallel with the alignment analysis to select a transit technology. The process included a broad request for information from the transit industry. Transit vehicle manufacturers submitted 12 responses covering all of the technologies listed in the Notice of Intent. An independent five-member technology panel composed of four transit experts and a transportation academic appointed by the City Council evaluated guided rubber-tire-on-concrete systems (e.g., Phileas bus system and VAL-type systems), monorail (which is a variation on rubber-tyred technology), steel-wheel-on-steel-rail systems, (e.g., light rail and rapid rail), and magnetic levitation (MAGLEV) . The panel considered the performance, cost, and reliability of the proposed technologies. By a four-to-one vote, the panel chose a steel wheel operating on steel rail system. The four panel members selected steel-wheel technology because it is safe, reliable, economical, and non-proprietary. Proprietary technologies, meaning those technologies that would have required all future purchases of vehicles or equipment to be from a single manufacturer, such as Mag-Lev and the Phileas system, were eliminated because none of the proprietary technologies offered substantial proven performance, cost, and reliability benefits compared to steel wheel operating on steel rail. Selecting a proprietary technology also would have precluded a competitive bidding process, likely resulting in increased overall project costs. The panel's findings were summarized in a report to the City Council dated February 22, 2008 entitled "Independent Technology Selection Panel Report".

Chapter 8 of the Final EIS details the Project's public involvement activities, including scoping and Public Hearing dates. The public was afforded opportunities to comment on the

project during one of the two public scoping meetings in December 2005 for the Alternatives Analysis and one of the three public scoping meetings for the preliminary engineering/EIS phase of the Project in March and April 2007. The Project also conducted five Public Hearings in December 2008 during the Draft EIS comment period in which the public was encouraged to provide comments on the Project. The Project conducted numerous Community Information Meetings, manned booths at public events, conducted Speakers Bureau presentations, and maintained a website and hotline to solicit public comment beginning in 2005 and extending through publication of the Final EIS. A list of these activities can be found in Appendix G of the Final EIS. The Project created the public involvement program according to FTA guidelines as required by SAFTEA-LU Section 6002. Regarding the November 2008 election results, the environmental review of the Project is independent of the electoral process or results. As mentioned earlier, NEPA review for this project began with the Notice of Intent published in the Federal Register on March 15, 2007.

The request for further evaluation of additional technology has been noted. However, no new information has been provided that would support re-evaluation of the technology.

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

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
Creation Date :	12/12/2008
Creator Affiliation :	
First Name :	Ernest
Last Name :	Brezeale
Business/Organization :	
Address :	91-1008 Makaike street
Alternative Preference :	
Apt./Suite No. :	
City :	ewa
State :	HI
Zip Code :	96706
Email :	brezealee001@hawaii.rr.com
Telephone :	808 554-6249
Telephone Extension :	
Add to Mailing List :	Both
Submission Method :	Website
Other Submission Method :	
Submission Date :	12/12/2008
Submission Content/Notes :	Please realign rail route through airport. As a airport employee I would use the rail to commute to and from work. Mahalo

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-331939

Mr. Ernest Brezeale
91-1008 Makaike Street
Ewa Beach, Hawaii 96706

Dear Mr. Brezeale:

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

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

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

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

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

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
Creation Date :	12/19/2008
Creator Affiliation :	
First Name :	Jacquelyn
Last Name :	Brezeale
Business/Organization :	
Address :	91-1008 Makaike st
Alternative Preference :	
Apt./Suite No. :	
City :	Ewa
State :	HI
Zip Code :	96706
Email :	taimalie@gmail.com
Telephone :	808 554-683
Telephone Extension :	
Add to Mailing List :	Both
Submission Method :	Website
Other Submission Method :	
Submission Date :	12/19/2008
Submission Content/Notes :	Please approve new re-alignment of rail to be routed through Military bases/Airport. As an employee that works in the airport area, I would consider using the rail to commute to work. It would also allive the most traffic from our traffic prone H-1/H2 corridor which I deal with on my daily commute. Mahalo, Jackie Brezeale

DEPARTMENT OF TRANSPORTATION SERVICES

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-332023

Ms. Jacquelyn Brezeale
91-1008 Makaike Street
Ewa Beach, Hawaii 96706

Dear Ms. Brezeale:

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

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

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

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Mr. Ted Matley
FTA Region IX
201 Mission Street, Suite 1650
San Francisco, CA 94105

2/5/09 VIA EMAIL

Comments on the Honolulu DEIS

In order for the DEIS to provide meaningful information to all the interested parties in this project, the analysis of different options must be carried out with a high level of professionalism. The contractors who are tasked with the design and analysis of traffic/transit improvements must apply themselves with the same high professional standards to reviewing all the alternatives. The contractors must utilize all their knowledge from other projects in order to bring forth the best set of options for our community. In our case, the contractor for the Alternatives Analysis and the DEIS did not use the same level of professionalism to look at all the alternatives.

Unfortunately, this project is riddled with political bias. The current mayor of Honolulu is only interested in rail. At the first scooping meeting in June of 2006, the mayor said, "Don't talk to me about roads. If you want to build roads talk to someone else".

The Mayor's influence can be seen in the way alternatives were analyzed. The Mayor hired the contractor for the Alternatives Analysis.

With the Mayor's admitted disinterest in roads, it is not surprising that the contractor for the Alternatives Analysis used a drawing from some citizen group website for the design of the Managed Lane alternative. The contractor does not know who made the drawing on the citizen group website. The contractor spent zero hours designing a managed lane alternative of their own even though their company has extensive experience in this area.

All of the comments in the Alternatives Analysis regarding the design of the Managed Lane alternative are made by highly paid contractors commenting on a line drawing from a citizen website. No attempt was made to offer their expertise to improve the design. Since the citizen group website drawing of the Managed Lane had one exit near town, the Mayor's contractors spent hours explaining how Managed Lanes cause traffic jams and slow commuters down under such circumstances. This type of analysis is clearly biased.

November 10, 2007, the League of Women voters had a transportation forum to discuss the options before the city. Toru Hamayasu represented the city of Honolulu at that forum. In this presentation, Toru clearly states that the contractor Parsons Brinckerhoff used a drawing from the website that belonged to the community group honolulutraffic.com as their design for the Managed Lane Alternative. This video will be back on the honolulutraffic.com website in a few days. It has been available to the public for the last year. Unfortunately, the company Brightcove that stored the videos for the

honolulutraffic.com website has ended that part of their business. When the video is back on the website, I will file an amendment to these comments.

In order for this DEIS process to be valuable, the city of Honolulu must let the contractors engineer a Managed Lane alternative of their own design. This new work can then be included in a Supplemental DEIS. Only than will the alternatives included in the DEIS be meaningful and not biased. Only then can the FTA be assured that Honolulu is making a prudent decision.

John Brizdle
3001 Lai Rd.
Honolulu, HI 96816
808-732-0071

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

KENNETH TORU HAMAYASU
DEPUTY DIRECTOR

June 11, 2010

RT2/09-299111R

Mr. John Brizdle
3001 Lai Road
Honolulu, Hawaii 96816

Dear Mr. Brizdle:

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

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

We agree with your statement that "[i]n order for the D[raft] EIS to provide meaningful information to all the interested parties in this project, the analysis of different options must be carried out with a high level of professionalism." The Council on Environmental Quality (CEQ) recognizes the importance of maintaining the public's faith in the integrity of the EIS process, and avoidance of conflicts in the preparation of EISs is an important means of achieving this goal. As discussed in CEQ's, Guidance Regarding NEPA Regulations, 48 Fed. Reg. 34263 (1983), Section 1506.5(c) prohibits a person or entity entering into a contract with a federal agency to prepare an EIS when that party has at that time and during the life of the contract pecuniary or other interests in the outcomes of the proposal. The contract for EIS preparation does not include any incentive clauses or guarantees of any future work on the project. As required by CEQ regulations at 40 CFR 1506.5 (c), the contractor preparing the environmental impact statement and alternatives analysis executed a disclosure statement prepared by the City specifying that they have no financial or other interest in the outcome of the project.

Consistent with 40 CFR 1502.14, the City rigorously explored and objectively evaluated all reasonable alternatives, and for alternatives which were eliminated from detailed study, briefly discussed the reasons for their having been eliminated and devoted substantial treatment to each alternative considered in detail including the proposed action so that reviewers may evaluate their comparative merits. Project scoping was conducted in two phases, as allowed for in FTA guidance related to the Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users (SAFETEA-LU). Early scoping was completed during the Alternatives Analysis phase and NEPA scoping was completed after selection of the Locally Preferred Alternative. The process is detailed as follows.

The Alternatives Analysis phase, as documented in Chapter 2 of the Final EIS, evaluated a range of modal and general alignment alternatives, including managed lanes, in terms of their costs, benefits, and impacts. The scoping process for the Alternatives Analysis involved a presentation of the viable alternatives to the public and interested public agencies and officials to receive comments on the Purpose and Need, alternatives, and scope of the analysis for the Alternatives Analysis. Scoping followed the FTA process that provides for a culling of alternatives studied in the EIS through an Alternatives Analysis. The following scoping meetings were held as part of the Alternatives Analysis phase of the Project:

- *December 13, 2005: Neal S. Blaisdell Center Pikake Room at 777 Ward Avenue in Downtown Honolulu from 2:00 to 4:00 p.m. (agency scoping meeting)*
- *December 13, 2005: Neal S. Blaisdell Center Pikake Room at 777 Ward Avenue in Downtown Honolulu from 5:00 to 8:00 p.m. (open to the public)*
- *December 14, 2005: Kapolei Middle School Cafeteria at 91-5335 Kapolei Parkway in Kapolei from 7:00 to 9:00 p.m. (open to the public)*

The scoping process initiated for the Alternatives Analysis included a variety of highway, bus and fixed guideway options for consideration. As a result of this scoping effort, the proposed Managed Lane Alternative was expanded. It was revised again during the Alternatives Analysis to improve its performance. Despite the improvements, the managed lane alternative was not able to meet the performance of the fixed guideway.

A second scoping opportunity was initiated in support of the Draft EIS in March of 2007. All meetings held were open to the public:

- *March 28, 2007: Kapolei Hale at 1000 Uluohia Street from 6:00 to 9:00 p.m.*
- *March 29, 2007: McKinley High School at 1039 South King Street from 5:00 to 8:00 p.m.*
- *April 3, 2007 at Salt Lake Elementary School at 1131 Ala Lilikoi Street from 5:00 to 8:00 p.m.*

In this later scoping effort, the public was requested to propose alternatives that would satisfy the purpose and need at less cost or with greater effectiveness, less environmental or community impact and alternatives that were not previously studied and eliminated for good cause. The only alternative that emerged that met these criteria was a fixed-guideway

alternative following two alternative alignments. All reasonable alternatives that emerged from these processes were ultimately evaluated in the Draft and Final EISs.

The FTA issued a Notice of Intent to prepare this EIS in the Federal Register on March 15, 2007. All interested individuals and organizations, as well as Federal, State, and Local agencies, were invited to comment on the Purpose and Need to be addressed by a fixed guideway transit system; the alternatives including modes, technologies and alignments to be evaluated; and environmental, social, and economic impacts to be analyzed. The alternatives evaluated in the Draft EIS are the result of the alternatives screening process and reflect comments received during the scoping process, as summarized in the Honolulu High-Capacity Transit Corridor Project National Environmental Policy Act Scoping Report (DTS 2007). Several scoping comments were received requesting reconsideration of the Managed Lane Alternative that was considered and fully evaluated during the Alternatives Analysis phase and found to perform substantially less effectively than the fixed guideway alternative that was selected for further analysis in the Draft EIS. Because no new information was provided that would have changed the findings of the Alternatives Analysis regarding the Managed Lane Alternative, it was not included in the Draft EIS for further consideration. Had information been provided that demonstrated greater effectiveness, the managed lane alternative would have been reconsidered in the Draft EIS.

Regarding alternatives studied, the Alternatives Analysis fully evaluated a reversible Managed Lane Alternative and documented that it performed poorly compared to the Fixed Guideway Alternative on a broad range of metrics. Based on public comments received on the Draft EIS, additional information, as summarized from the Alternatives Analysis Report and Honolulu High-Capacity Transit Corridor Project Alternatives Screening Memorandum, has been added to Chapters 2 and 8 of the Final EIS to explain why this alternative was rejected. Both the Alternatives Analysis Report and Screening Memorandum were available to the public. The following is a quote from Chapter 8, Section 8.6.12, of the Final EIS:

> *"A number of commenters stated that the alternatives studied did not properly address other options for the corridor. In particular, there was a concern that the Managed Lane Alternative was not included in the Draft EIS as an alternative."*

The process of alternatives screening and selection is discussed in Chapter 2 and in Section 8.6.1 [of the Final EIS]. As discussed, alternatives were developed through three general phases: (1) the FTA Alternatives Analysis process; (2) the selection of a Locally Preferred Alternative; and (3) the NEPA scoping and Draft EIS process. The initial screening of alternatives is documented in the Honolulu High-Capacity Transit Corridor Project Alternatives Screening Memorandum (DTS, 2006a) (Screening Memorandum). The subsequent FTA Alternatives Analysis process is provided in the Honolulu High-Capacity Transit Corridor Project Alternatives Analysis Report (DTS 2006b) (Alternatives Analysis).

The initial screening process considered a wide range of alternatives, including "construction of a 'managed' two-lane elevated structure for transit vehicles and potentially carpools, as well as single occupant vehicles willing to pay a congestion-based toll," as described on page S-2 of the Screening Memorandum. The screening results for the Managed Lane Alternative are discussed on pages C-4 through C-5 of this report. The analysis found that

the transit mode share under the Managed Lane Alternative would hold constant with the No Build Alternative; the automobile mode share would increase; and the bike and walk mode share would decrease. Vehicle hours traveled would decrease, while vehicle miles traveled would increase slightly.

This initial screening process identified four alternatives that were presented at scoping meetings held to obtain public input. As described on page 5-2 of the Screening Memorandum, one of the alternatives recommended for further evaluation was the Managed Lane Alternative. The Managed Lane Alternative originally was described as follows:

> *"The Managed Lane Alternative would include construction of a two-lane grade-separated facility between Waiawa Interchange and Iwilei for use by buses, paratransit vehicles and vanpool vehicles (see Figure 5-1). The lanes would be managed to maintain free-flow speeds for buses, while simultaneously allowing High-Occupancy Vehicles (HOVs) and variable pricing for toll-paying single-occupant vehicles. Intermediate bus access points would be provided in the vicinity of Aloha Stadium and Middle Street. Bus operations utilizing the managed lanes would be restructured to use the Managed Lane and enhanced to provide additional service between Kapolei and other points Ewa of Downtown, through to the University of Hawai'i at Manoa."*

The scoping process resulted in the revision of this proposed alternative. As discussed on page 6-1 of the Screening Memorandum:

> *"Based on scoping comments, a second operational option was included under the Managed Lane Alternative. The initial option proposed a two-lane grade-separated facility between Waiawa Interchange and Iwilei which would operate as one lane in each direction at all times of the day. The second option proposes similar infrastructure, but it would operate as a reversible facility with two lanes traveling Koko Head during the morning peak period, and then reversing to travel Ewa in the PM peak period. Both operational options would include restructured and enhanced bus operations by utilizing the managed lanes to provide additional service between Kapolei and other points Ewa of Downtown, and both would be managed to maintain free-flow speeds for buses. Providing that enough capacity existed, High-Occupancy Vehicles (HOVs) and toll-paying single-occupant vehicles would also be allowed to use the facility under either scenario; however, it is possible that under the initial option (one lane in each direction), there would not be enough excess capacity to allow toll-paying single occupant vehicles and still maintain reasonable speeds. Intermediate access points would be provided in the vicinity of Aloha Stadium and the Keehi Interchange."*

This alternative was further developed in the Alternatives Analysis Report, with additional features added to maximize the performance of the alternative, as discussed on page 2-4:

> *"The Two-direction Option would serve express buses operating in both directions during the entire day. The Reversible Option would serve peak-direction bus service, while reverse-direction service would use H-1. Twenty-nine bus routes, with approximately 93 buses per hour, would use the managed lane facility during peak hours for either option.*

One limited-stop route and one local route would continually operate in the managed lane. A total of 27 peak-period express routes would operate in the peak direction using the managed lane facility. Of these, three would be new express routes serving developing areas and nine would be new routes developed for exclusive use of the managed lane. The nine new managed lane express bus system routes would originate from Kalaeloa, Kapolei, or Central Oahu and terminate at the Alapai Transit Center, Waikiki, or UH Manoa. Other peak-period, local and limited-stop routes would follow a route similar to the current structure but would use the managed lane for the line-haul portion of the route.

"A toll structure has been developed that ensures that the managed lane facility would operate to maintain free-flow speeds for buses. To maintain free-flow speeds in the Two-direction Option, it may be necessary to charge tolls to manage the number of HOVs using the facility. For the Reversible Option, three-person HOVs would be allowed to use the facility for free, while single-occupant and two-person HOVs would have to pay a toll."

As discussed on page 3-8 of the Alternatives Analysis Report, the enhanced bus system would include an increased fleet size, estimated at 321 buses beyond the existing fleet for the two-direction managed lane facility and 381 buses for the reversible managed lane facility, to provide a sufficient fleet to ensure that the alternative would function as planned.

Regarding the Managed Lane Alternative in particular, the Alternatives Analysis Report estimated total capital and operating costs for the Managed Lane Alternative. As discussed on page 2-16, capital costs for the Managed Lane Alternative were estimated to range between $3.6 and $4.7 billion, of which $2.6 to $3.8 billion would be for construction of the managed lanes. Transit operating costs for the Managed Lane Alternative would range between approximately $251 and $261 million as a result of additional buses that would be put in service under that alternative. These costs do not include the cost of maintaining the managed lane facility. Capital costs for the Fixed Guideway Alternative, including bus system costs, would range between $5.2 and $6.1 billion for the Full-corridor Alignments, of which $4.6 to $5.5 billion would be for the fixed guideway system. The costs would be $4.2 billion for the 20-mile Alignment, of which $3.6 billion would be for the fixed guideway system. Operating costs for the Fixed Guideway Alternative in 2030, in 2006 dollars, would be approximately $192 million. The total operating costs for the Fixed Guideway Alternative, including the bus and fixed guideway, would range between approximately $248 and $256 million.

The capital cost of the Managed Lane Alternative thus is potentially somewhat lower than the 20-mile Fixed Guideway Alternative and even lower than the Full-corridor Alternative. Operating costs would be slightly higher. These cost factors were considered in conjunction with other project goals in evaluating the alternatives.

With respect to transit travel time benefit, the Managed Lane Alternative options would improve some trips that were particularly well-served by the managed lanes. In general, the Managed Lane Alternative would increase transit travel times by increasing traffic on the overall roadway system and creating more delay for buses. The H-1 Freeway leading up to the managed lanes would become more congested because cars accessing the managed lanes

would increase traffic volumes. Significant congestion would occur where the managed lanes connect to Nimitz Highway at Pacific Street near Downtown. Much of the time saved in the managed lane itself would be negated by the time spent in congestion leading up to the managed lane, as well as exiting the lanes at their downtown terminus. Furthermore, areas that are not directly served by the managed lane would not experience much positive change from the No Build Alternative. As discussed on page 3-14, the Alternatives Analysis Report found that, "although the Managed Lane Alternative would provide some travel-time improvement for certain areas, it has significant limitations with regard to improving travel times or transit service for a broader customer base.

As discussed on page 3-17, transit ridership would increase only 5.3 to 6.4 percent over the No Build Alternative, a small increase compared both to the cost of the Managed Lane Alternative and the increase that would result from the Fixed Guideway Alternative, which would increase transit ridership by 21 percent for the 20-mile alignment.

The volume of peak-hour vehicles in key areas would actually increase under the Managed Lane Alternative compared to the No Build Alternative. As discussed on page 3-27, the Fixed Guideway Alternative would reduce the number of vehicles by 3 to 12 percent.

With respect to the goal of providing equitable transportation solutions that meet the needs of lower-income transit-dependent communities, the Alternatives Analysis Report noted that the Managed Lane Alternative, "would not substantially improve service or access to transit for transit-dependent communities, as buses that use existing HOV facilities would be routed to the managed lane facility but would continue to be affected by congestion in other parts of their routes. Arterial congestion would increase in the study corridor with the Managed Lane Alternative, making bus access to the managed lanes less reliable" (page 6-8).

The Alternatives Analysis Report also considered consistency with existing land use planning and regional transportation planning. On page 6-13, the report concluded that the Fixed Guideway Alternative, "best serves the areas of Oahu that are designated for future growth and development. It is also the only alternative that is consistent with regional transportation system planning defined in the 2030 Oahu Regional Transportation Plan (OMPO 2006a)."

The evaluation of alternatives inevitably involves trade-offs. As stated on page 6-13 of the Alternatives Analysis Report, the "greatest trade-off among the alternatives is between the transportation benefit provided and the cost to implement alternatives. . . . The Managed Lane Alternative provides slightly more benefit [than the Transportation System Management (TSM) alternative, which had little effect on traffic], but at a substantial cost. While the Fixed Guideway Alternative would have the highest cost, it is also the only alternative that would provide a substantial transportation benefit, measured both by the benefit to transit users and in the reduction in congestion compared to the No Build Alternative."

The Alternatives Analysis findings are summarized in Table 2-2 in Chapter 2 of the Final EIS. The Managed Lane Alternative is discussed in Section 2.2.2 of this Final EIS. As stated in the Final EIS and supported by the lengthy analysis that preceded the preparation of the Draft EIS, the Managed Lane Alternative was not pursued because the Managed Lane Alternative

would not have achieved project goals and objectives, would not result in substantially fewer environmental impacts, and would not be financially feasible. For all of these reasons, it was not advanced to consideration in the EIS.

Your comments regarding statements made by politicians are not related to the NEPA environmental analysis of the Project. FTA is the federal lead agency and will continue to ensure compliance with NEPA as part of their responsibilities under NEPA and federal law.

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

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
Creation Date :	11/22/2008
Creator Affiliation :	
First Name :	David
Last Name :	Brown
Business/Organization :	AIT Taipei
Address :	4170 AIT Taipei Place
Alternative Preference :	Salt Lake
Apt./Suite No. :	
City :	Dulles
State :	VA
Zip Code :	20189
Email :	Brownde22@yahoo.com
Telephone :	
Telephone Extension :	
Add to Mailing List :	Both
Submission Method :	Website
Other Submission Method :	
Submission Date :	11/22/2008
Submission Content/Notes :	I am temporarily living in Taiwan, but own property in Salt Lake. I am very upset that there was a vote on the rail project where the agreed route had been through Salt Lake. However, within hours of the public's Nov 4 vote endorsing the rail project, certain city council members were proposing to change the route -- including one who had fought tooth-and-nail against the entire project. The mayor and the council members are supposed to be the people's servants. This sudden switch was a betrayal. They should go back to the route endorsed earlier by both the Council and the people -- i.e. the Salt Lake route. When the system is built out in the future, perhaps an airport spur could be added. thanks. David Brown

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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

MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

February 16, 2010 RT9/09-330585

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

Dear Mr. Brown:

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

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

Your preference for the Salt Lake Alternative has been noted. While each of the alternatives includes trade-offs between benefits and impacts, the Airport Alternative from East Kapolei to Ala Moana Center has been selected as the Preferred Alternative. The identification of the Airport Alternative as the Preferred Alternative was made by the City to comply with FTA's NEPA regulations that state that the Final EIS should focus on the Preferred Alternative (23 C.F.R. § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative, public input on the Draft EIS, and City Council Resolution 08-261 identifying the Airport Alternative as the Project. The selection of the Airport Alternative is described in Chapter 2 of this Final EIS. The discussion of the alternatives considered is included in Chapter 2 of this Final EIS and the Alternatives Analysis. As discussed in Section 3.4.2 of this Final EIS, the Airport Alternative will carry the most passengers with 116,000 daily passengers and 282,500 daily trips in 2030, thereby resulting in the greatest transit-user benefits. The

Airport Alternative will also result in the fewest vehicle miles traveled and vehicle hours of delay, as well as provide access to major employment areas, including Honolulu International Airport, that will have substantially greater ridership than the other alternatives considered.

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

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
Creation Date :	1/16/2009
Creator Affiliation :	
First Name :	rick
Last Name :	brown
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Alternative Preference :	
Apt./Suite No. :	
City :	
State :	HI
Zip Code :	98682
Email :	icetecllc@yahoo.com
Telephone :	
Telephone Extension :	
Add to Mailing List :	Email
Submission Method :	Website
Other Submission Method :	
Submission Date :	01/16/2009
Submission Content/Notes :	I am looking for information on your light rail maintanance managment plan, along with full time emploment working in a managment position in the maintance or the rolling stock and track system. Mahalo.

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-334000

Mr. Rick Brown
icetecllc@yahoo.com

Dear Mr. Brown:

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

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

The vehicle maintenance plan will be developed after selection of a vehicle contractor. Job specifications will be developed by the system operator and approved by the City. Operation is scheduled to begin in 2012 and job requirements may be expected to be established about a year before the positions are needed. Information about employment opportunities can be found under the Human Resources tab on the City's website at www.honolulu.gov.

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

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Status :	Initial Action Needed
Creation Date :	1/18/2009
Creator Affiliation :	
First Name :	rick
Last Name :	brown
Business/Organization :	
Address :	
Alternative Preference :	
Apt./Suite No. :	
City :	
State :	WA
Zip Code :	98682
Email :	rustyblades63@yahoo.com
Telephone :	
Telephone Extension :	
Add to Mailing List :	Email
Submission Method :	Website
Other Submission Method :	
Submission Date :	01/18/2009
Submission Content/Notes :	when will you update your wed site and do you have a time line for the project constuction, and when will you start the maintanance facility planning. Mahalo.

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-334004

Mr. Rick Brown
rustyblades63@yahoo.com

Dear Mr. Brown:

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

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

The Project website at www.honolulutransit.org is updated as new information is available. The Project schedule is included in Chapter 2 of the Final EIS. If this schedule changes an updated schedule would be placed on the Project website. Lastly, maintenance and storage facility planning is on-going at this time.

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

Very truly yours,

WAYNE Y. YOSHIOKA
Director

CITY COUNCIL

CITY AND COUNTY OF HONOLULU
HONOLULU, HAWAII 96813-3065

Charles K. Djou
Councilmember, District IV
Chair, Intergovernmental Affairs Committee
Phone: (808) 768-5004 / Facsimile: (808) 768-5011
Email: cdjou@honolulu.gov
Web: www.honolulu.gov/council/d4

634

RECEIVED
08 DEC 18 P 3:41
OFFICE OF THE CITY CLERK
CITY & COUNTY OF HONOLULU
TRANSPORTATION SERVICES

MEMORANDUM

DATE: December 17, 2008

TO: Wayne Yoshioka, Director
Department of Transportation Services

FROM: Councilmember Charles K. Djou

SUBJECT: **DRAFT ENVIRONMENTAL IMPACT STATEMENT**

Pursuant to your letter of November 12, 2008 that was sent with the DEIS and of November 13, 2008 to Council Chair Apo, I enclose a comment sent by email on the DEIS. By copy of this memorandum, I send a copy to Mr. Ted Matley of FTA Region IX.

Please do not hesitate to contact me if you have any questions. Best wishes.

cc w/ encls.: Mr. Ted Matley
FTA Region IX

Matsuda, Sylvia

From: Djou, Charles
Sent: Wednesday, December 10, 2008 5:10 PM
To: Matsuda, Sylvia
Subject: FW: 1st Phase of Rail

Please forward to the FTA in San Francisco.

Charles K. Djou
Councilmember, District IV (Waikiki, East Honolulu)
Honolulu City Council
530 South King Street, Suite 202
Honolulu, Hawaii 96813
Phone: (808) 768-5004
Fax: (808) 550-6689
Email: cdjou@honolulu.gov
Web: www.honolulu.gov/council/d4

From: Lora Burbage [mailto:lburbage@yahoo.com]
Sent: Wednesday, December 10, 2008 4:05 PM
To: Djou, Charles
Subject: 1st Phase of Rail

Aloha Councilmember Djou,

To whom it may concern:

Councilmember Djou's proposal to construct the first phase of the rail, from the Aiea to the Pearl City area into Honolulu makes a lot of sense. Not just for the fact that this section of the rail will be usable immediately upon completion, taking people into the city but also due to the uncertain economic times we are in right now. Let's face it we just might not have the money to complete the whole thing, I really hope this doesn't happen but it is a strong possiblity.

Starting the first phase from Kapolei to Waipahu makes no sense because I'm sure very few people are needing to get to Waipahu for work. The majority of the people need to get into the downtown area. If we should run out of money, this first phase would be a waste of hard earned money.

Mahalo nui loa,
Lora Burbage

EducationYearRound.com
A Love for Learning Will Last a Lifetime!

Lora Burbage EducationYearRound.com A Love for Learning Will Last a Lifetime!.

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

February 16, 2010 RT10/09-336268

Ms. Lora Burbage
rustyblades63@yahoo.com

Dear Ms. Burbage:

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

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

As described in Section 2.5.10 of the Final EIS, to support phased opening of the system, the first construction phase must be connected to a maintenance and storage facility, which requires considerable land. The first phase of the Project must be connected to the maintenance and storage facility because, in addition to maintenance of equipment and ongoing operations, the maintenance and storage facility houses the main control center for the entire Project, and the required testing and operation of the system could not be completed without access to it. No location has been identified closer to Downtown with sufficient available land to construct a maintenance and storage facility. The Project will be constructed in phases to accomplish the following:

- *Match the anticipated schedule for right-of-way acquisition and utility relocations*

- *Reduce the time that each area will experience traffic and community disturbances*
- *Allow for multiple construction contracts with smaller contract size to promote more competitive bidding*
- *Match the rate of construction to what can be maintained with local workforce and resources*
- *Balance expenditure of funds to minimize borrowing*

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

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

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

Very truly yours,

WAYNE Y. YOSHIOKA
Director

998703

Donald H. Burger
476 Paumakua Place
Kailua, HI 96734
barbdon@hawaiiantel.net
(808) 261 - 6391

RECEIVED
09 FEB 6 P12:33
TRANSPORTATION SERVICES

February 5, 2009

Mr. Wayne Yoshioka, Director
Dep't. Of Transportation Services
City and County of Honolulu
650 S. King Street, 3rd Floor
Honolulu, HI 96813

Dear Mr. Yoshioka:

I am concerned about many impacts which will result from the proposed heavy rail system on Oahu and its construction, to be spread over many years. I spent 28 years in construction estimating and engineering, have reviewed the draft EIS, and do not believe the full force and effect of this proposed project has been adequately covered.

One question I have is with regard to commercial agricultural operations which will be subjected to moving and starting their operations over in a new location. Will it be possible to avoid losing a year more of income as local markets are without products or forced to import products at a much higher cost? Is an adequate amount included in the cost estimate to enable the displaced providers to do what they must to stay in business and provide adequate service during construction?

A greater concern is that of noise generated by passing trains, every few minutes during the day and far into the night. I believe the ability of students to concentrate on studies will be greatly diminished in schools near the tracks, and sleep will be disturbed in homes and condominiums, possibly resulting in Lawsuits on behalf of those affected.

Will passengers to and from the airport be able to transport luggage and other heavy items on the train? Has adequate cost of providing such amenities been considered?

Yours truly,

Donald H. Burger

Donald H. Burger

cc: Mr. Ted Matley
cc: Gov. Linda Lingle
cc: Honolulu City Council

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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

MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT2/09-298703R

Mr. Donald H. Burger
476 Paumakua Place
Kailua, Hawaii 96734

Dear Mr. Burger:

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

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

Some land uses will need to change in order to accommodate the Project; however, impacts to the natural and built environments are minimized whenever possible. Coordination with affected property owners is ongoing, and every effort will be made to reduce impacts. The primary impacts are anticipated to result from inconveniences and disruptions to adjacent residents, businesses, and business customers that are inherent in any major construction project. These include the following:

- *Presence of construction workers and materials.*
- *Temporary road closures and traffic diversions.*
- *Temporary reductions in parking availability.*

- *Airborne dust, noise, and vibrations.*
- *Businesses' loss of visibility to their customers.*

Proper controls – as discussed in Section 4.18 in the Final EIS – may mitigate these effects to protect residents' comfort and daily life and to prevent inconveniences and disruptions to the flow of customers, employees, materials, and supplies to and from area businesses, including agricultural business.

Those from whom property is to be acquired will be treated according to the requirements of the Federal Uniform Relocation Assistance and Real Property Acquisition Policies Act. This Act provides for purchase at fair market value and includes relocation assistance to those affected. The Project will not compensate for potential loss of agricultural income for those properties not acquired.

Regarding your concern about noise, as discussed in Section 4.10.3 of the Final EIS, the Project will include an integrated noise blocking parapet wall at the edge of the guideway structure that extends three feet above the top of the rail and a system specification for vehicles with wheel skirts. The parapet wall will substantially reduce ground-level noise. Wheel skirts will increase the benefit of the parapet wall at locations above the elevation of the track. Measures to reduce noise levels above the track elevation, such as sound-absorptive materials in the track area, will be evaluated during Preliminary Engineering for the Project. Once the Project is operating, noise levels will be measured to determine the actual extent of project noise impacts. There are no severely impacted areas in the corridor. In addition, there are no noise impacts predicted for any schools along the project alignment; noise levels due to operation of the trains is not expected to be above 55 dBA Leq(h) for classrooms during operation of the system. Mitigation measures for construction near schools will be finalized during the design and construction phase, when more information on the types of construction activities is determined. Lastly, the luggage policy for the system is not final, but the concept of the policy will be to allow luggage that does not interfere with the safety or comfort of other passengers. Project cost estimates include train features.

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

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

R7 12/05-291 710

Michael Burton
2889 Ala Ilima St # 16A
Honolulu, HI. 96818
December 12, 2008

'08 DEC 16 A9:48
DTS
RAPID TRANSIT

Honolulu High-Capacity Transit Corridor Project
Department of Transportation Services
650 N. King Street 3rd floor
Honolulu, HI. 96813

Dear Sirs:

I am writing to express my support for the rail project. I also would like to show and share a comment expressed by Councilman Charles Djou.

I support the rail project however; Councilman Djou offered some changes to this project, one of which I support the other I do not. The proposal I support from Councilman Djou is his viewpoint on where the project should start. In regards to the fact that monies to complete this rail project aren't 100% secured and the fact that it is very expensive, there is a chance we could run out of monies before completing the whole thing. Therefore I suggest that Councilman Djou comment "start the project in the Aiea area" be taken into consideration. This in turn would get the project in full operation where it's most needed. The Kapolei end can be completed over the back end of this operation. The changes in the route from Salt Lake to the airport I feel is poorly thought out from Councilman Djou. This portion I have address in a previous letter and I will not repeat it here.

Thank you for your support.

Sincerely,

Michael Burton

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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

MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT10/09-336262

Mr. Michael Burton
2889 Ala Ilima Street, #16A
Honolulu, Hawaii 96818

Dear Mr. Burton:

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

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

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

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

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

- *Balance expenditure of funds to minimize borrowing.*

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

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

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

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

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

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

R712/08-291712

Michael Burton
2889 Ala Ilima St. #16A
Honolulu, HI. 96818
December 5, 2008

08 DEC 16 A9:48
DTS
RAPID TRANSIT

Department of Transportation Services
650 N. King St. 3rd floor
Honolulu, HI. 96813

Dear DOTS:

I am a long-time resident of the Salt Lake community, I am writing to express my concern about the recent discussions and pending decision to reroute the rail from the Salt lake community. I don't understand the rational behind this proposal but, I'd like to offer some constructive insight to this project.

The whole intention of the rail is to service the people of Oahu, especially along the corridor from Kapolei to downtown and onward to the University of Hawaii. My argument addresses the proposed change in the route from Pearl Harbor to the Airport rather than through the Salt lake community. If the intention of the Rail is to service the people Of Oahu than routing this project into a residential community would better serve its means by meeting the public where it is most convenient. This in turn would result in higher usage and a faster return on your investment

The proposed routing of the rail from the Pearl Harbor to the Airport would not be a wise use of public money because:

1) The rail will not be supporting the people of Oahu fully by bypassing densely populated communities along this route.

2) The rail infilstructure would intrude on large portions of federal land along this route. This in turn would result in large delays in the projects progression due to permitting of these intrusions along the route. These delays would amount to cost overruns on an already costly project.

3) Navigating around the physical structures within the airport industrial area if this is possible would again drive up the cost of this project tremendously.

I believe that there are council members who maybe holding onto the notion of tourist "taking the train to the plane" ideal. This I feel is fanciful thinking on behalf of some council members. Oahu is not like some of the major cities with rail like New York, Chicago, San Francisco or Los Angeles. Tourists in these cities are prone to catch a flight over night to somewhere; in Hawaii (with the exception of locals) more than likely they will be traveling with large bags. If this is the case, the same restriction that commuters on the bus experiences would apply here. If you can sit your bag on your lap or under your chair, then you're fine. Items bigger than that you'll have to catch a Cab. Lastly I

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT10/09-336264

Mr. Michael Burton
2889 Ala Ilima Street, #16A
Honolulu, Hawaii 96818

Dear Mr. Burton:

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

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

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

In response to your first point, as provided in Section 3.4.2 of the Final EIS, the Airport Alternative will carry the most passengers with 116,000 daily passengers and 282,500 daily trips

in 2030, thereby resulting in the greatest transit-user benefits. The Airport Alternative will also result in the fewest vehicle miles traveled and vehicle hours of delay, as well as provide access to major employment areas including Honolulu International Airport, that will have substantially greater ridership than the other alternatives considered.

In response to your second point, as shown in Appendix C of the Final EIS, there is only a small need for right-of-way from Federal land. Right-of-way acquisitions will occur early in the planning process. In addition, the Airport Alternative will have approximately 5 percent fewer parcel acquisitions overall than would the Salt Lake Alternative.

Concerning your third point, navigation around physical structures within the Airport has been considered and reflected in design and costs of the Project.

The Airport Alternative primarily serves major employment destinations. As shown in Table 3-13, over half of all daily transit trips (bus and rail) will be work-related. However, as discussed in Section 3.4.2 of the Final EIS, over 9,900 visitors will use the fixed guideway daily, of which 1,800 will use the system to travel to or from the Airport. The luggage policy for the system is not final, but the concept of the policy will be to allow luggage that does not interfere with the safety or comfort of other passengers.

Regarding your comments on the Salt Lake Boulevard connection, the Salt Lake Boulevard alignment studied in the Draft EIS did not include a connection to Pearl Harbor. The alignment proposed in your letter would require property from the Navy and acquisition of private property.

The proposed route in the last paragraph of your letter would be more expensive than the Salt Lake alignment that was studied in the Draft EIS and would not directly serve the Airport. Lastly, the Project includes a station at Lagoon Drive and Aolele Street. This station will provide a transfer point to buses serving the Salt Lake neighborhood. New bus routes will be added to serve Salt Lake communities, including Foster Village.

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

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
Creation Date :	11/19/2008
Creator Affiliation :	
First Name :	Lyle
Last Name :	Cady
Business/Organization :	
Address :	300 Wai Nani Way
Apt./Suite No. :	403
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State :	HI
Zip Code :	96815
Email :	loudsound_design@hotmail.com
Telephone :	
Telephone Extension :	
Add to Mailing List :	Both
Submission Method :	Website
Other Submission Method :	
Submission Date :	11/19/2008
Submission Content/Notes :	I love the idea of a rail transit system on Oahu. However, I feel that the panel members selecting steel wheel on steel rail: Steve Barsony, Ken Knight, Henry Kolesar, Ron Tober, made the wrong choice. Would not a monorail system cost much less and take much less time to build. Monorails are also much safer, heavy rail systems can and do derail. Look up DERAILMENT under your favorite Search engine. You won't find any monorails there. What about Aesthetics? Elevated heavy rail, the guideway casts a wide shadow and blocks out much more of the sky. YES to a Hawaii rail transit system! NO to steel on steel!

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-330551

Mr. Lyle Cady
300 Wai Nani Way
Apartment 403
Honolulu, Hawaii 96815

Dear Mr. Cady:

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

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

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

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

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

Limited experience with monorail systems in the United States does not support the assumption of cost savings compared to industry-standard steel wheel systems. Safety and reliability experience with the Seattle and Las Vegas systems have included falling parts, fires, and the need to evacuate the Seattle system using fire department ladder trucks.

Visual and aesthetic conditions are discussed in Section 4.8 of the Final EIS. The Project will be set in an urban context where visual change, including shade and shadow, is expected and differences in scales of structures are typical. Section 4.8.3 of the Final EIS states that "the fixed guideway and stations will be elevated structures. They will result in noticeable changes to views where project elements will be near existing views or in the foreground of these views." This change will also affect the location and extent of shadows. Overall, the shadow pattern created by the guideway and stations will change throughout the day and seasonally, depending on the alignment's direction, time of day, and time of year. The analysis states that shadow impacts along the alignment will vary with orientation, the height of the stations, guideway, surrounding trees and local development (Section 4.8.3 of the Final EIS). Shade and shadow effects are illustrated in the simulated views included in Section 4.8 of the Final EIS.

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

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Action Completed
Creation Date :	11/5/2008
Creator Affiliation :	
First Name :	Judee
Last Name :	Calaro
Business/Organization :	
Address :	
Alternative Preference :	
Apt./Suite No. :	
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State :	HI
Zip Code :	96701
Email :	judeecalaro@aol.com
Telephone :	
Telephone Extension :	
Add to Mailing List :	Email
Submission Method :	Website
Other Submission Method :	
Submission Date :	11/05/2008
Submission Content/Notes :	Can you tell me the exact place for the rails' stop area on Aloha Stadium. I know by now that my house is not affected since I never got any letter saying my house will be bought out. It has been sent out to the affected people already, right? I live around there, and I am concerned on the impact of the rail, although I support the rail for Oahu. Please advise.

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT8/09-330351

Ms. Judee Calaro
judeecalaro@aol.com

Dear Ms. Calaro:

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

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

Figure 2-25 of the Final EIS shows the Aloha Stadium Station location in the auxiliary parking lot on Kamehameha Highway. Please see Appendix C of the Final EIS for detailed information regarding right-of-way acquisitions required for the Project. Appendix C of the Final EIS contains specific information regarding right-of-way required for the Aloha Stadium station. The City has notified all property owners whose property may be impacted by the Project and will remain in contact with those owners throughout the right-of-way process.

The FTA and DTS appreciate your interest in the Project. The Final EIS has been issued in conjunction with the distribution of this letter. You may view the Final EIS on the Project website at www.honolulutransit.org. You may request a DVD of the Final EIS and additional content through the "Contact Us" tab on the website or by calling the Project hotline at 566-2299.

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

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Status :	Initial Action Needed
Creation Date :	11/24/2008
Creator Affiliation :	
First Name :	Nancy
Last Name :	Campbell
Business/Organization :	
Address :	
Alternative Preference :	
Apt./Suite No. :	
City :	
State :	HI
Zip Code :	96706
Email :	colmenares@hawaii.rr.com
Telephone :	
Telephone Extension :	
Add to Mailing List :	Email
Submission Method :	Website
Other Submission Method :	
Submission Date :	11/24/2008
Submission Content/Notes :	b! would like you to know that this is a great move for the island. I would have attended UH or HPU for my masters degree but due to traffic issues on the island, I had to complete my education online. With this choice, I did not have to worry about driving and coming home late and tired with no time to spend with my family. In addition, this project will open up such great opportunities. I will now be able to apply for a higher paying job in town and not worry about traffic while living in the Leeward area. THANK YOU!!! Whatever routes we start with on this transit plan, is a start. Like Mufi says, it is something. Keep up the awesome work and I can't wait until the rail transit extends to EWA BEACH or near the area. Thank you very much! Nancy Campbell

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-330795

Ms. Nancy Campbell
colmenares@hawaii.rr.com

Dear Ms. Campbell:

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

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

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

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

The Project will connect to Ewa Beach via bus service from East Kapolei. Future bus routes, including frequencies, are shown in Appendix D of the Final EIS. The Project has logical termini at East Kapolei and Ala Moana Center and independent utility from any extensions that may be constructed in the future. The proposed future extensions to West Kapolei, Salt Lake Boulevard, Waikiki, and UH Manoa are discussed in the cumulative impacts sections of Chapters 3 and 4 of the Final EIS. The future extensions are not part of the Project, thus they are not required to be evaluated under Chapter 343 of the Hawaii Revised Statutes and the National Environmental Policy Act (NEPA). Under NEPA, environmental analysis is only required when there is a proposed action by a federal agency. Here, because the future extensions are not proposed for implementation at this time they are not part of the Project studied in the Final EIS. It would be premature to undertake an environmental analysis of the extensions (beyond the cumulative impacts analysis) because they are not part of the proposed action to be taken by the City and FTA. If the future extensions are proposed for implementation at some time in the future, environmental analysis of the extensions and appropriate alternatives will be undertaken at that time.

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

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Status :	Initial Action Needed
Creation Date :	1/8/2009
Creator Affiliation :	
First Name :	Helito
Last Name :	Caraang
Business/Organization :	
Address :	98-144 Hekaha Street
Alternative Preference :	
Apt./Suite No. :	
City :	Aiea
State :	HI
Zip Code :	96701
Email :	
Telephone :	
Telephone Extension :	
Add to Mailing List :	None
Submission Method :	Website
Other Submission Method :	
Submission Date :	01/08/2009
Submission Content/Notes :	The approved route shouldn't be changed as it was what the people voted for. And it is most logical to go through centers of populations, i.e. Salt Lake, as the rail's primary objective is to get the residents to and from their jobs with the least time possible. The airport can be connected later; connections to UH and Waikiki should get the priority over the airport.

DEPARTMENT OF TRANSPORTATION SERVICES

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-333566

Mr. Helito Caraang
98-144 Hekaha Street
Aiea, Hawaii 96701

Dear Mr. Caraang:

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

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

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

alternatives, more than 75 percent were in support of the Airport Alternative. For more information this selection is discussed in Section 2.4 of the Final EIS. Since publication of the Draft EIS, design has been advanced, further analysis has been completed, and information has been added in response to comments on the Draft EIS and agency coordination. The Final EIS discusses the process that was used to select the Preferred Alternative, how comments were considered in the decision-making process, impacts and mitigation commitments.

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

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
Creation Date :	12/22/2008
Creator Affiliation :	
First Name :	jake
Last Name :	cargas
Business/Organization :	
Address :	mokauea st.
Alternative Preference :	
Apt./Suite No. :	
City :	honolulu
State :	HI
Zip Code :	96819
Email :	chrysler_87@yahoo.com
Telephone :	
Telephone Extension :	
Add to Mailing List :	None
Submission Method :	Website
Other Submission Method :	
Submission Date :	12/22/2008
Submission Content/Notes :	2018 is way too LONG!. why would they start the construction in the west side? isn't that weird? shouldn't they build at the most populated area to serve many people? if they build along waipahu to aloha stadium, and kalihi to chinatown, that would benefit most of the people beauce that is where the congestion starts. if they start in the left most area, who will benefit from that if thay are traveling to the downtown honolulu? they still have to ride the bus and still pass waipahu, kalihi,etc... and besides, people from the center area are the ones who get unfair treatment. they have to wait for the buses from the west and the moment thus buses arrive, there's no more available seat and everything. western peopl already have "the boat" and the "Express buses". well if they ride from the west area and wants to go downtown, it will be nice if they stops at the center and ride the rail through downtown.

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

May 21, 2010

RT9/09-332252

Mr. Jake Cargas
chrysler_87@yahoo.com

Dear Mr. Cargas:

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

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

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

As described in Section 2.5.10 of the Final EIS, to support phased opening of the system, the first construction phase must be connected to a maintenance and storage facility, which requires considerable land. The first phase of the Project must be connected to the maintenance and storage facility because, in addition to maintenance of equipment and ongoing operations, the maintenance and storage facility houses the main control center for the entire Project, and the required testing and operation of the system could not be completed without access to it. No location has been identified closer to Downtown with sufficient available land to construct a maintenance and storage facility. The Project will be constructed in phases to accomplish the following:

- *Match the anticipated schedule for right-of-way acquisition and utility relocations*

- *Reduce the time that each area will experience traffic and community disturbances*
- *Allow for multiple construction contracts with smaller contract size to promote more competitive bidding*
- *Match the rate of construction to what can be maintained with local workforce and resources*
- *Balance expenditure of funds to minimize borrowing*

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

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

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

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

Very truly yours,

WAYNE Y. YOSHIOKA
Director

C1174

Castle & Cooke
Hawai'i

100 Kahelu Avenue
Mililani, Hawai'i 96789-3997
P.O. Box 898900
Mililani, Hawai'i 96789-8900
O'ahu: (808) 548-4811 • Fax (808) 548-3980
Lana'i: (808) 565-3000 • Fax (808) 565-3312

Harry A. Saunders
President

January 30, 2009

Mr. Wayne Yoshioka, Director
Department of Transportation Services
City and County of Honolulu
650 South King Street
Honolulu, Hawai'i 96813

Dear Mr. Yoshioka:

Subject: ***Honolulu High-Capacity Transit Corridor Project***
Draft Environmental Impact Statement

Castle & Cooke supports the acceptance of the Draft Environmental Impact Statement for the proposed Honolulu High-Capacity Transit Corridor Project. This project is critical to address O'ahu's growing transportation demands, particularly in Central O'ahu and 'Ewa where the majority of O'ahu's future population growth and urban development has been designated to occur. We support the rail transit system as a critical component of a multi-model approach needed to address our transportation challenges for the betterment of all O'ahu residents.

We are pleased to see that the project includes provisions for the direct access from the H-2 Freeway to the Pearl Highlands Transit Station. We support the proposed H-2 access ramp to the park-and-ride structure as it represents a direct regional benefit of the transit project to existing Central O'ahu and North Shore commuters and will help support the future growth that has been designated for the Central O'ahu region.

Thank you for the opportunity to comment on the Honolulu High-Capacity Transit Corridor Project. If there are any questions, please contact Bruce Barrett, Executive VP & President, at 548-3746.

Sincerely

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2009 FEB 3 A10:49
DEPARTMENT OF TRANSPORTATION SERVICES
CITY AND COUNTY OF HONOLULU

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT2/09-297987R

Mr. Harry A. Saunders, President
Castle & Cooke Hawaii
P.O. Box 898900
Mililani, Hawaii 96789-8900

Dear Mr. Saunders:

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

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

Your support for a Fixed Guideway Transit Alternative, H-2 Freeway access ramp, and Pearl Highlands park-and-ride facility have been noted. While each of the alternatives discussed in the Draft EIS includes trade-offs between benefits and impacts, the Airport Alternative from East Kapolei to Ala Moana has been selected as the Preferred Alternative as described above. As compared to the alternatives discussed in the Draft EIS, the Airport Alternative will carry the most passengers, provide the greatest transit-user benefits, and result in the fewest vehicle hours of delay. It will provide access to employment centers at Pearl Harbor Naval Base and Honolulu International Airport and will serve the Salt Lake neighborhood with connecting bus service. Of the three Build Alternatives addressed in the Draft EIS, the Airport Alternative will have slightly less impacts to the natural and built environment analyzed in

the Draft EIS. During the public comment period on the Draft EIS, the public overwhelmingly supported the Airport Alternative. Of the comments that specifically supported one of the alternatives, more than 75 percent were in support of the Airport Alternative. For more information this selection is discussed in Section 2.4 of the Final EIS. Since publication of the Draft EIS, design has been advanced, further analysis has been completed, and information has been added in response to comments on the Draft EIS and agency coordination. The Final EIS discusses the process that was used to select the Preferred Alternative, how comments were considered in the decision-making process, impacts and mitigation commitments.

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

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

CBRE CONSULTING, INC.

CBRE
CB RICHARD ELLIS

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February 6, 2009

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

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

Re: Honolulu High Capacity Transit Corridor EIS

Dear Messrs. Matley and Yoshioka:

The City of Honolulu recently completed a Draft Environmental Impact Statement ("EIS") for the proposed Honolulu High-Capacity Transit Corridor ("Project"), a 20-mile elevated rail line that will connect the town of Kapolei in west O'ahu to downtown Honolulu.

CBRE Consulting was contracted by Kamehameha Schools to provide insight to the economic impacts that could be expected from the development and operation of the Project. Principals at CBRE Consulting have close to 30 years experience in analyzing market, financial and economic impacts for both public sector and private sector clients, including extensive work on O'ahu and over 20 years experience in market and financial feasibility and economic impact studies for transit oriented development projects throughout the United States.

CBRE Consulting has analyzed the Draft EIS, as well as development impacts of numerous transit systems in North America. With regard to the proposed system in Honolulu, we offer the following observations and comments.

GENERAL COMMENT

Per our review of the Draft EIS we note that it measured economic impacts at a regional level without consideration of the impacts to property owners in between station areas. Table 4-1 in the EIS identifies impacts from acquisitions, displacement and relocation of businesses in a statistical manner – not mentioning potential problems other than blocking views. The Mitigation measures proposed in the Draft EIS are minimal and should be expanded.

Transit systems have wide ranging impacts depending on the specific land use characteristics along the route. Analysis of potential impacts should not be confined to a regional level. We recommend that the City examine the local impacts all along the route and at each station area.

MAJOR NORTH AMERICA TRANSIT SYSTEMS

There are dozens of transit systems in the U.S. and Canada comprised of subways, heavy rail, light rail and elevated systems (i.e. monorails). Since it was not possible to analyze development patterns for every transit system, CBRE Consulting compiled a short list of systems to study based on relevant characteristics and the availability of data.

CBRE Consulting performed case study research on elevated, fixed-guideway systems (i.e. Vancouver, Miami, and the San Francisco Bay Area) to identify key issues they faced and their resulting impacts on local real estate markets. CBRE also examined successful ground level rail systems across the U.S. to illustrate their impacts on the community. Cities examined included Portland and Los Angeles. The analysis examined both impacts during the construction period and throughout ongoing operations.

Impacts During Construction

Research findings universally indicate significant losses to businesses along the construction routes of major rail systems, regardless of type. Traffic disruptions, limited access, visibility issues, utility service interruptions, and a general tendency for people to avoid esthetically unappealing construction sites resulted in declines in customer numbers, sales, and in some cases, the closure of businesses.

Some of the most dramatic cases of this type of negative impact were in Vancaver, British Columbia and Salt Lake City where an estimated 30 percent of local businesses closed during the construction of TRAX. In Vancover, an estimated 40 to 60 percent of the businesses failed along the construction route for SkyTrain's Canada Line in Vancouver, due to a reported 50 percent decline in local sales volume during construction. The most significant cause of the negative impact in these locations was the lack of public assistance provided to support impacted businesses.

Property Value Impacts – Near Stations

While there has been a significant amount of research into the impact of transit on real estate values, very few quantitative conclusions are applicable across all metropolitan areas. Every transit system is unique in terms of the population it serves, frequency of service, cost of service, local economic factors, public support, integration with neighborhoods, etc. However, some general conclusions can be drawn from our primary and secondary research.

1. While land prices in a transit corridor can often exhibit significant increases following the announcement of a new system due to speculative activity, following completion of the system, research indicates that lower density (generally residential) land values often decline.

2. The broad economic benefits of rail transit tend to be limited to suburban communities outside major metro areas like New York City, where commuting by car is extremely difficult. Urban infill locations suffer negative impacts if the rail systems are not well-

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conceived and potential impacts thoroughly evaluated and mitigated early in the design process.

3. Research indicates that different climate and environmental conditions can create negative impacts. For example, in urban areas with hot and wet climate, such as Miami, elevated lines can provide shelter for homeless, increasing crime and litter and thereby detracting from commercial activity.

4. Weather is not the only cause of security problems under elevated lines. Solutions to mitigate these concerns can include the installation of surveillance cameras, increased police patrolling, emergency call boxes, and closed-circuit television monitoring. In some cases, extensive lighting and/or illumination has been used to create openness and high visibility.

5. Generally, the land uses that most consistently benefit from transit station proximity are office and high density residential. The former tends to command higher rents due to a desirable ease of access for employees. Residential values also increase if increased densities (i.e., multifamily development opportunities) are a part of well-conceived TOD plans.

6. The impact on retail values is mixed and tends to depend both on the type of retail use and the type of rail system. Elevated systems can cause visibility problems for small street-front locations but can be instrumental in bringing shoppers to large malls or big box retail outlets. The design and orientation of the station is critical.

7. Proactive planning efforts to allow high density residential and commercial development near stations are the primary cause of land value appreciation. An example of this is the SkyTrain system in Vancouver, where the local governments instituted long term regional planning to create new town centers around elevated transit stations.

8. Major developments do not occur near stations in the absence of healthy demand, increased density, or a substantial financial subsidy by local governments. Our research found dozens of station areas where no new development has occurred for 20 to 30 years following the transit operation.

Property Value Impacts – Mid-Line

The third quarter 2007 Journal of Real Estate Research published one of the few studies on transit corridor impacts on all property proximate to transit corridors. "The Impact of Transit Corridors on Residential Property Values" by John Kilpatrick, Ronald Throupe, John Carruthers and Andrew Krause, found that "proximity to the transit corridor alone without a direct access benefit conveys a negative impact on nearby housing values." A direct access benefit is defined as being within normal walking distance i.e. less than one-half mile from a station. These negative impacts result from increased noise, pollution, crime, and diminished views.

In addition to the literature research, our primary research across the U.S. and Canada indicated there are significant negative value impacts on properties immediately adjacent to the rail line. These were particularly pronounced along the BART East Bay and Los Angeles Metro Blue Line.

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CBRE Consulting analyzed these general research findings in terms of their application to the proposed elevated Honolulu Rail system. In general, we believe that elevated rail would impair redevelopment due to a loss of visibility and access from Kamehameha Highway and Dillingham Blvd.

As shown in the case study examples, we would expect retail uses to suffer from visibility, access and traffic interruption services. Depending on whether or not public assistance is available, retail sales could decline and turnover could increase.

Mid-Line residential development will also be negatively impacted by noise and visual impairments. At a minimum, it will be important for the City to provide sound-proofing for residential units within viewing distance of the elevated line.

Another important concern is that the noise, light and view impairments from elevated rail lines will have a dramatic impact on the marketability of future low-rise and mid-rise workforce housing development along the route. Developers may be forced to build more expensive high-rise developments to avoid those impairments.

SUMMARY FINDINGS AND RECOMMENDATIONS

CBRE Consulting found that there are significant negative impacts on selected properties associated with transit systems in general, most notably in the case of elevated systems. Depending on the property type, these can include the following:

- Loss of view and shadowing;
- Excessive noise;
- Increased crime and vagrancy;
- Loss of visibility (for commercial);
- Increased challenges to future residential development if not planned in advance and provided public financing support; and
- Property access issues.

Although all of the rail systems described in our case studies resulted in some negative impacts on surrounding properties, at least during construction, various aspects of each successful system depended on:

- The commitment of municipalities to employment and density;
- A sound strategy for land assembly;
- Healthy real estate market conditions;
- The interface and integration of rail and real estate concessions with adjoining TOD;
- Careful phasing; and
- Public-private collaboration and the development of successful partnerships, including the establishment of the appropriate risk and revenue sharing mechanisms.

In order to minimize the negative impacts, CBRE Consulting has identified several potential mitigation options for the proposed Honolulu project, including the following:

During construction:

AR00001484

- Provide advertising dollars to inform community of construction activity and business operating hours
- Provide clear street signage for ingress/egress to business locations
- Provide direct financial assistance/low interest loans to businesses
- Sequencing construction to minimize removal of multiple blocks of street parking
- Provide advance notification to businesses and residents of traffic detours/delays and possible utility interruptions
- Implement cleaning program to regularly remove dirt and debris

After construction:

- Work with land owners and consultants to increase residential and commercial land use density within ¼ mile of select stations to promote effective transit oriented development and increase ridership
- Redesign stations for central platform or one-sided platform to avoid creating 200-300 foot long tunnel effect at street level
- Integrate station design/construction with new development
- Provide secure parking at more stations and integrate with commercial development
- Ensure thoughtful Right-of-way acquisition so that acquisitions avoid leaving unusable out parcels.
- Provide compensation to residential property owners immediately adjacent to the elevated line
- Use landscaping /security fencing to minimize ability to assemble underneath the elevated rail lines
- Provide security cameras and increase police patrols to minimize vagrancy
- Provide as many left turn lanes as possible to allow access to local businesses
- Create sound barriers
- Provide assistance to individual property owners (e.g. rebates) for mitigation improvements (double glazed windows, fences etc)
- Fund public amenities around stations such as parks, community/cultural facilities, public art etc. (e.g., Metrotown)
- Restrict a "Fare Paid" area, i.e., riders must produce tickets to pass through gates vs. riding on the "honor system" like SkyTrain.

If you have any questions please do not hesitate to contact us at 213-613-3751.

Respectfully Submitted,

Thomas R. Jirovsky
Senior Managing Director

Kimberley J. Player
Managing Director

AR00001485

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

KENNETH TORU HAMAYASU
DEPUTY DIRECTOR

June 11, 2010

RT2/09-299154R

Mr. Thomas Jivorsky
CBRE Consulting, Inc.
355 South Grand Avenue, Suite 1200
Los Angeles, California 90071-1549

Dear Mr. Jivorsky:

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

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

All property owners adjacent to the Project have been notified and asked to participate in the environmental process. The discussion of direct impacts to property owners along the alignment that are not subject to acquisition or relocation were presented in the following sections of Chapter 4 in the Final EIS: Section 4.5, Community Services and Facilities; Section 4.6, Neighborhoods; Section 4.10, Noise and Vibration; and Section 4.16, Archaeological, Cultural, and Historic Resources. Other indirect and cumulative impacts along the route and at each station area are presented in Section 4.19. In the Final EIS, mitigation measures have been expanded upon in many sections. Section 4.1 of the Final EIS lists all the sections in that chapter that have been updated since publication of the Draft EIS.

Your additional comments regarding case study research on other major North American transit systems have also been noted.

Regarding your suggested construction mitigation options, the Project will continue its public involvement and education program throughout construction. Project representatives will work with businesses that will be affected by construction, as well as ensure that businesses and the general public are fully informed of current and upcoming construction activities. However, it is up to individual businesses to inform their customers of their operating hours during construction. As stated in Section 4.18 of the Final EIS, mitigation to reduce adverse economic hardships for existing businesses along the project alignment during construction will include the following:

- *Maintain access to businesses during construction*
- *Develop a public involvement plan prior to construction to inform business owners of the construction schedule and activities*
- *Initiate public information campaigns to reassure people that businesses are open during construction and to encourage their continued patronage*
- *Minimize the extent and number of businesses, jobs, and access affected during construction*
- *To the extent practicable, coordinate the timing of temporary facility closures to minimize effects to business activities—especially those related to seasonal or high sales periods*
- *Minimize, as practical, the duration of modified or lost access to businesses*
- *Provide signage, lighting, or other information to indicate that businesses are open*
- *Provide public information (e.g., press releases or newsletters) regarding construction activities and ongoing business activities, including advertisements in print and on television and radio*
- *Phase construction in each area so as to maintain access to individual businesses for pedestrians, bicyclists, passenger vehicles, and trucks during business hours and important business seasons*
- *Provide advance notice if utilities will be disrupted and schedule major utility shut-offs during non-business hours*

In addition, Section 4.18.3 and 4.18.5 discuss mitigation measures for visual and aesthetic and noise and vibration effects during construction. These measures will include:

- *Removing visibly obtrusive erosion-control devices, such as silt fences, plastic ground cover, and straw bales, as soon as an area is stabilized*
- *Locating stockpile areas in less visibly sensitive areas whenever possible so they are not visible from the road or to residents and businesses*
- *Shielding temporary lighting and direct it downward to the extent possible*
- *Limiting the times construction lighting could be used in residential areas*

- *Replacing removed street trees and other vegetation with appropriately sized vegetation as soon as practical after construction is completed in the same location or another location in accordance with City and State requirements*
- *Developing a monitoring plan with noise limits*
- *Construct temporary noise barriers or curtains*
- *Equipping construction equipment engines with adequate mufflers and intake silencers*
- *Strategically placing stationary equipment, such as compressors and generators*

The City will not provide financial assistance or low-interest loans to businesses during construction. Where acquisition of property will occur, compensation will be provided to affected property owners, businesses, or residents in compliance with all applicable Federal and State laws and will follow the Federal Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970.

Construction of the guideway is likely to be sequential, progressing from one block to the next, as shown in Appendix E of the Final EIS. As stated in Section 4.18.1 of the Final EIS, several public involvement strategies will be used to inform businesses and the public about construction activities, including roadway detours. These strategies include those listed in the bullet points above. Part of the mitigation associated with construction will be to regularly remove dirt and debris.

Regarding your post-construction mitigation suggestions, the Project is focused exclusively on the construction and implementation of rail transit service, which is analyzed in the Draft and Final EISs. However, as discussed in Section 4.19.2 of the Final EIS, transit-oriented development (TOD) is expected to occur in station areas as an indirect effect of the Project. The increased mobility and accessibility that the Project will provide will also increase the desirability and value of land near stations, thereby attracting new real estate investment nearby (in the form of TOD). Planning and zoning around station areas will be established and conducted by the City's Department of Planning and Permitting under a process covered by the City's new TOD ordinance (09-4).

To address your concern about the creation of a tunnel effect at stations, center platform stations generally have a greater total shaded area than a side platform station because of the need to widen and split the track structure prior to the station. Center platform stations are proposed where appropriate.

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

While there are over 4,100 parking spaces identified as part of the Project, the experience with park-and-ride facilities in Honolulu to date is limited. They have been generally underused. The lots that are part of the Project are located toward the Ewa end of the route and are based on consideration of parking demand using the travel demand forecasting model for the year 2030. Further, the projected mode of access shares were compared to observed data from several Mainland areas, notably San Diego. Given the history of park-and-ride use on the island, it seems prudent to evaluate any need for additional or larger facilities on the basis of empirical experience rather than commit substantial additional funding now. Any need for additional parking at the four stations with park-and-ride facilities would best be determined once experience is gained about their use. As stated in Section 2.5.4 of the Final EIS, security will be provided in the form of surveillance cameras, lighting, fencing, barriers, on-site personnel, or other means. DTS will discuss options with commercial developers interested in integrating additional parking for transit use into their proposed developments.

Where relocations will occur, compensation will be provided to affected property owners, businesses, or residents in compliance with all applicable Federal and State laws and will follow the Federal Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970. It is assumed that for the properties that will be partially acquired, existing land uses will not change.

Regarding security, the majority of the system will be placed in roadway medians, which is not conducive to being used as a shelter. Landscaping and other measures will be used where appropriate to discourage loitering. In addition, as stated in Section 2.5.4 of the Final EIS, security, including cameras, will be provided at all stations and on all trains; however, security personnel may not be physically located in all locations at all times.

During Final Design, detailed investigations will be conducted to reduce the anticipated access impacts to local businesses caused by guideway column placements. Section 3.4.3 of the Final EIS discusses impacts of the Project on the roadway network. Near properties that are owned by Kamehameha Schools, there is no loss of left-turn lanes at signalized intersections (as also shown in Appendix C of the Final EIS). However, restrictions for making left turns in and out of many driveways, including some owned by Kamehameha Schools, are expected due to construction of a raised median along Dillingham Boulevard.

As discussed in Section 4.10.3, to address noise issues, the Project includes an integrated noise-blocking parapet wall that extends three feet above the top of the rail and wheel skirts.

Your comments regarding mitigation improvements for individual property owners and public amenities have been noted; however, public improvements not related to the transit system are not within the authority of DTS. These are activities outside the Project and beyond the scope of the EIS.

Lastly, the system will operate as a proof-of-payment system, as described in Section 2.5.1 of the Final EIS.

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

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
Creation Date :	11/14/2008
Creator Affiliation :	
First Name :	Emika
Last Name :	Ceishall
Business/Organization :	
Address :	
Alternative Preference :	
Apt./Suite No. :	
City :	
State :	HI
Zip Code :	96701
Email :	emikab@yahoo.com
Telephone :	
Telephone Extension :	
Add to Mailing List :	Email
Submission Method :	Website
Other Submission Method :	
Submission Date :	11/14/2008
Submission Content/Notes :	Mr. Dacus, of the Mayor's Advisory Committee on Bicycling suggested I ask you this: I very much would like to commute to and from Aiea and Honolulu on my bike. However, it's just not safe to do so; I speak from personal experience. What I'd like to know is, will the Rail route(s) proposed by the Mayor include paths or lanes reserved exclusively for bicycles? I'm not talking about taking a bike on the train, I'm talking about on the road. Will there be space set aside specifically for bicycle use? Mahalo, Emika B. Ceishall

DEPARTMENT OF TRANSPORTATION SERVICES

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

May 21, 2010

RT9/09-330441

Ms. Emika Celshall
emikab@yahoo.com

Dear Ms. Celshall:

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

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

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

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

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

website at www.honolulutransit.org. You may request a DVD of the Final EIS and additional content through the "Contact Us" tab on the website or by calling the Project hotline at 566-2299. Issuance of the Record of Decision under NEPA and acceptance of the Final EIS by the Governor of the State of Hawaii are the next anticipated actions and will conclude the environmental review process for this Project.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Status :	Initial Action Needed
Creation Date :	12/28/2008
Creator Affiliation :	
First Name :	Bonnie
Last Name :	Chan
Business/Organization :	
Address :	
Alternative Preference :	
Apt./Suite No. :	
City :	
State :	HI
Zip Code :	96701
Email :	b_chan@hawaiiantel.net
Telephone :	
Telephone Extension :	
Add to Mailing List :	None
Submission Method :	Website
Other Submission Method :	
Submission Date :	12/28/2008
Submission Content/Notes :	I am concerned about the noise pollution that will be ongoing from 4 a.m. until midnight. Doesn't the city have noise regulations? I am a professional music therapist (i work for the state), & I am especially aware of the stressful effects of excessive and disruptive sound & noise on human physiology and behavior.

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-332264

Ms. Bonnie Chan
b_chan@hawaiiantel.net

Dear Ms. Chan:

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

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

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

The project design includes an integrated noise-blocking parapet wall at the edge of the guideway structure that extends 3 feet above the top of the rail. The parapet wall will substantially reduce ground-level noise.

Wheel skirts will increase the benefit from the parapet wall at locations above the elevation of the track. The use of sound-absorptive materials below the tracks in the areas that will experience moderate noise impacts will reduce the Project noise levels from the upper floors

to below the impact level. Once the Project is operating, noise levels will be re-measured to confirm that there are no noise impacts from the Project.

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

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Status :	Initial Action Needed
Creation Date :	12/1/2008
Creator Affiliation :	
First Name :	charlie
Last Name :	chang
Business/Organization :	
Address :	91-941 Ololani Street
Alternative Preference :	
Apt./Suite No. :	
City :	Ewa Beach
State :	HI
Zip Code :	96706
Email :	creationexistance@yahoo.com
Telephone :	
Telephone Extension :	
Add to Mailing List :	Both
Submission Method :	Website
Other Submission Method :	
Submission Date :	12/01/2008
Submission Content/Notes :	Portland, Denver, Washington D.C.and Charlotte is not in the middle of the ocean. I believe I heard on the CD that was sent to me, you are estimating 200,000 plus more people living on this island driving vehicles. If the roads are crowded imaging 200,000 plus people riding the transit. It doesn't make sense. Then you talk about 11000 jobs and that is good but what happens after the job is completed? The cost of everything else goes up, who has to survive the cost of a high economy? Isn't there enough foreclosures, retired people have to look for another job, homeless people, welfare people who is able to work but is not working owning nice cars and boats, and much more issues that will be affected. There should be a double decker for the freeway where everyone pays for the road from their own registration. By having the rail transit we are force to pay for something we may never use. Remember not everyone will ride the rail transit. This is not feasible and not fair for (hopefully we still have the middle class around) many retirees and elderly people. They don't get overtime nor do they get pay raise to up keep with high cost of living. One day you will be an elderly person and that is the only time you will realize the rail transit is not good for Hawaii because we live on a Island. I guess we love to spend other people money to get what we want. Why should there be a stop at the stadium? The stops should be located from Kapolei to Pearl Harbor, Airport, Downtown, Waikiki, and Daimond Head. Place where most tourist will be affected.

DEPARTMENT OF TRANSPORTATION SERVICES

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-330931

Mr. Charlie Chang
91-941 Ololani Street
Ewa Beach, Hawaii 96706

Dear Mr. Chang:

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

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

Your opposition to rail transit is noted. While not on the Mainland, Honolulu is a growing city with increasing traffic congestion. The Executive Summary of the Final EIS states: The Project is intended to provide faster, more reliable public transportation service than can be achieved with buses operating in congested mixed-flow traffic. It will provide reliable mobility in areas of the corridor where people of limited income and an aging population live and will serve rapidly developing areas of the corridor. The Project will also provide additional transit capacity and an alternative to private automobile travel, as well as improve transit links within the corridor. In conjunction with other improvements included in the Oahu Regional Transportation Plan 2030, the Project will help moderate anticipated traffic congestion in the corridor.

After construction, the Project will directly provide a limited number of jobs, but more importantly will support other employment by providing workers with a fast and reliable transportation option. The transit system is designed to primarily serve local residents, with stations near residential and employment areas. Aloha Stadium provides an opportune location for a park-and-ride. Tourists will find the system convenient for many of their trips.

The Project will have stops at East Kapolei, Pearl Harbor, the Airport, and Downtown. The Project has logical termini at East Kapolei and Ala Moana Center and independent utility from any extensions that may be constructed in the future. The proposed future extensions to West Kapolei, Salt Lake Boulevard, Waikiki, and UH Manoa are discussed in the cumulative impacts sections of Chapters 3 and 4 of this Final EIS. Future extensions may have additional stops in Waikiki or the Diamond Head area. However, the future extensions are not part of this Project, thus they are not required to be evaluated under Chapter 343 of the Hawaii Revised Statutes and the NEPA. Under NEPA, environmental analysis is only required when there is a proposed action by a Federal agency. Here, because the future extensions are not proposed for implementation at this time, they are not part of the Project studied in this Final EIS. It would be premature to undertake an environmental analysis of the extensions (beyond the cumulative impacts analysis) because they are not part of the proposed action to be taken by the City and FTA. If the future extensions are proposed for implementation in the future, environmental analysis of the extensions and appropriate alternatives will be undertaken at that time. As stated in Section 3.4.2 of the Final EIS, approximately 9,900 visitors are expected to use the system daily.

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

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Honolulu High-Capacity Transit Corridor Project

Welcome to the Honolulu High-Capacity Transit Corridor Project's Public Hearing for the Draft Environmental Impact Statement/Section 4(f) Evaluation.

This public meeting and hearing has been designed to inform the public about the transit project, explain materials contained in the Draft EIS, answer questions from the public, and collect public input on project issues related to the Draft EIS, Section 106 of the National Historic Preservation Act, Section 4(f) of the U.S. Department of Transportation Act, and floodplains affected by the project.

Please review the project information and ask project staff any questions about the project that you might have. The Draft EIS is available on the project website at www.honolulutransit.org.

You may provide official comments in several ways. Here at this Public Hearing you may provide oral comments to a court reporter who will record them for the record or use this form to provide written comments. After the meeting, you may provide an on-line comment at www.honolulutransit.org or use this form to send a written comment to the Department of Transportation Services. All comments must be postmarked or received by January 7, 2009 in order for them to be included in the Final EIS.

Name: Homer A. Chang Address: 5210 Likini St. #405

Phone: 839-4538 Honolulu, HI 96818

E-mail: None

Comment(s):

I have no objections to the route going thru the airport from Aloha Stadium to downtown. It would be nice to have a shuttle from Salt Lake to the airport.

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-331796

Mr. Homer A. Chang
5210 Likini Street, Suite 405
Honolulu, Hawaii 96818

Dear Mr. Chang:

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

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

Your support for the Airport Alignment is noted. With the Project, residents of the Salt Lake neighborhood will have connections to the Airport. Four new bus routes will be added to provide service for Salt Lake area neighborhoods:

- *New Route 31 will connect passengers along Wanaka Street, Likini Street (Ewa of Ala Lilikoi), and Ala Ilima Street with the rail station at Lagoon Drive. Passengers can transfer to rail from Route 31 to access the airport.*

- *New Route 301 will connect passengers to rail stations at Aloha Stadium and the Middle Street Transit Center. Route 301 will serve passengers in Foster Village and along Salt Lake Boulevard, Keaka Street, Aliamanu Street, and Likini Street.*

Passengers can transfer to rail from Route 301 to access the Airport at either the Aloha Stadium Station or Middle Street Transit Center Station.

- *New Route 311 will provide service between Moanalua Valley, Salt Lake (serving Ala Napunani and Ala Ilima Streets), and the Airport.*

- *New Route 314 will connect passengers to the Aloha Stadium and Pearl Harbor stations. Route 314 will serve passengers along Salt Lake Boulevard, Bougainville, Radford Drive and Kamehameha Highway. Passengers can transfer to rail from Route 314 to access the airport.*

Existing and future bus routes, including route numbers and frequencies, are described in Appendix D of the Final EIS. The actual implementation of these routes may differ.

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

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
Creation Date :	12/20/2008
Creator Affiliation :	
First Name :	Robert
Last Name :	Chang
Business/Organization :	
Address :	758-16th Ave
Alternative Preference :	
Apt./Suite No. :	
City :	Honolulu
State :	HI
Zip Code :	96816
Email :	bobbychang@hawaii.rr.com
Telephone :	733-2818
Telephone Extension :	
Add to Mailing List :	Both
Submission Method :	Website
Other Submission Method :	
Submission Date :	12/20/2008
Submission Content/Notes :	I feel the rail should start in the middle of town and work its way in both directions connecting with the University of Hawaii ASAP. Starting in the middle of a field is less expenses but who wants to ride around in the middle of a field? If ridership is the desired end result it must be built where the riders are. This is also important as with the economy as it is, the tax dollar from excise taxes is not going to be as projected. Raising property taxes, or the excise tax for this project should not be an alternative as people of Hawaii are having a hard enough time as it is. The airport rather than the Salt Lake route is also a better choice. Too bad there isn't a way to do iti underground as it will make Oahu very ugly with trains running in the air blocking views and making noise.

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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

MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-332249

Mr. Robert Chang
758 16th Avenue
Honolulu, Hawaii 96816

Dear Mr. Chang:

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

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

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

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

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

- *Balance expenditure of funds to minimize borrowing.*

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

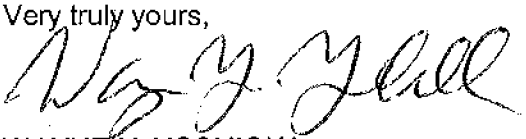
As portions of the Project are completed, each will be opened incrementally so that system benefits, even if limited during the initial phases, will be realized prior to completion of construction of the entire Project.

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

Tunnel options were evaluated and eliminated during the Alternatives Analysis phase because they would not be financially feasible.

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

Very truly yours,



WAYNE Y. YOSHIOKA
Director

Enclosure

From: Yoshioka, Wayne [wyoshioka@honolulu.gov]
Sent: Friday, February 06, 2009 6:46 PM

Subject: FW: Charley's Taxi re DEIS
Importance: High
Attachments: Transit Buses-Ridership; MILES, POPULATION.jpg

Aloha ahiahi!

Here's comments from Charley's Taxi.

A hui hou,

Wayne

From: Dale Evans [mailto:dale@charleystaxi.com]
Sent: Friday, February 06, 2009 6:30 PM
To: ted.matley@fta.dot.gov; Yoshioka, Wayne
Subject: Charley's Taxi re DEIS

February 6, 2009

Mr. Ted Matley
FTA Region IX
201 Mission Street, Suite 1'650
San Francisco, CA 94105
415-744-3133

Mr. Wayne Y. Yoshioka
Department of Transportation Services
City & County of Honolulu
650 South King Street, 3rd Floor
Honolulu, Hawaii 96813
808-768-8303

Comments of Charley's Taxi re
Draft Environmental Impact Statement/Section 4f) Evaluation
Honolulu High Capacity Transit Corridor Project
City and County of Honolulu, Oahu, Hawaii

Traffic Congestion Depresses Consumer Activity, Business Operations and the Economy

Traffic congestion directly and daily adversely impacts taxicab passengers, operators and drivers. Government policies have purposely induced traffic congestion to unacceptable levels. To spite 'automobility,' politicians punish innocent consumers and businesses who have become 'prisoners of congestion.' Traffic congestion does not simply affect the government subsidized transit buses, every transportation operator and business will experience higher costs and difficulties to fill customer demand and expectations, many of whom will become unable to ride TheBus or TheTrain.

We are deeply concerned about the impacts of the rail system to make congestion worse on the roads along and surrounding the rail route. Honolulu having the one of the fewest urban road miles in the US and territories, and with many narrow roads throughout the route, no promises of mitigation are sufficient to compensate for the permanent damage to traffic conditions. Private transportation providers' services to our customers will become more costly and difficult to fill.

Traffic congestion reduces productivity and raises fuel and labor costs for transportation providers. Travel delays increase fares to our passengers. Traffic congestion lengthen trip times that also become unreliable to show up for appointments on time. Since the city removed the 4th lane on the Ala Wai Boulevard in 2004, our taxi drivers experience travel delays to the tune of 4 to 6 lost trips a day. The loss of trips has caused taxi drivers to work longer hours and the 7th day in order to make up for the loss of trips due to traffic congestion.

With about 1400 licensed taxicabs in Honolulu, the number of trips lost per day approximates 7000 trips on any day of lost productivity. Having 1.6 passengers average per taxi trip, 11,200 potential taxi passengers are sacrificed a day in Honolulu. A recent congestion study (for cordon pricing experiment that was contemplated) in Manhattan showed similar loss of 5 taxi trips a day due to congestion.

Before this latest tourism downturn, congestion regularly limited supply as drivers were stuck in traffic. Our passengers therefore endured longer waits and travel times and higher fares. The frequency of 2-3 parades a week in Waikiki was a nightmare as fares doubled and tripled for a 2 mile trip in Waikiki, discouraging frustrated drivers from going into bad traffic.

Restaurant reservations schedules are thrown off due to traffic congestion, with a domino affect on later seatings. Theater schedules, parties and charity fund-raising events are similarly thrown off and delayed due to traffic congestion. Traffic congestion affects the economic engines that drive Hawaii's economy: Tourism, Military and Construction.

Since 1990, only 2.23 freeway miles have been added on Oahu even though tens of thousands of homes were added to West Oahu, the corridor for which the rail is planned. As if to buttress rail proposals, little has been done over decades to relieve the bottlenecks on H1/H2 merge and the Middle Street merge. Motorists gained 10-15 minutes in travel time just by widening one lane the length of 1.5 miles for the Waiomalu off-ramp.

Excessive Dependence on Government Subsidies

Rail systems are more costly than bus systems because a rail system cannot operate with feeder buses, thus requiring two systems: TheTrains plus TheBuses. Heavier reliance on government subsidies for rail poses the same fiscal quagmire as rail systems elsewhere that threaten the economic stability of municipalities, states and nations today.

The federal contribution to the excessively high cost of rail pales in comparison to the local cost burden.

The proposed rail system's costs, risks, and liabilities are so excessive to be unsustainable without even greater tax increases on Honolulu's small and declining population of 900,000. Compared to other metropolitan areas, Oahu residents and businesses suffer a higher cost of living, highest costs of doing business, highest taxes, severely high cost of housing, highest electricity costs.

Threat to Economic Stability

The city has no process to assure independent oversight, accountability, performance and transparency over this proposed project. Hence, the prospects of mismanagement and the cost over-runs and delays can be expected to be much higher and longer than any other rail system built in the USA.

Honolulu has the dubious distinction of having one of the highest construction costs in the nation, where everything has to be shipped in, and therefore takes longer and farther to travel.

The city has no experience to manage a megaproject of the proposed size of TheTrain and its Transit-Oriented Developments.

The city is totally reliant on consultants to manage the proposed rail projects and the consultant in charge has a rather tarnished history not only in Boston but elsewhere.

The mayor may not complete his term beyond 2010 and there is no stronger political leader to champion this project in his stead.

The city and its rail advocates have failed to inform the public in the many millions spent on meetings, hearings, literature and advertisements, that the price of Honolulu's rail system — for its size and scope — is many, many times higher than other systems touted to promote the successes of rail systems.

Honolulu has a long history of delays in construction projects coming in on time, on budget. In recent times, construction projects have been stopped due to "iwi" discoveries, and the rail project traversing through downtown Honolulu promises to encounter many more iwi discoveries, for sure.

The current financial crisis has eliminated or lessened many of the prospective developers to participate in the Transit-Oriented Developments surrounding the proposed rail stations.

Prioritizing Commuters over Seniors with Multiple Disabilities

Chapter 1, Background, Purpose and need (DEIS pp 1-1 to 1-21)
The burgeoning transportation needs for seniors and disabled passengers are totally absent from this discussion. When why does the city focus exhorbitant assets and resources ($4 Billion-plus) for a commuter market that is a pittance in comparison to the needs of the senior population over 60 years in age, to grow to 284,350 by 2030?

Between 2000 and 2030, Oahu's population over 60 years of age is projected to increase by 134,157 or 189 percent (from 150,193 to 284,350), to become 25.4 percent, (from 17 percent in 2000) of Oahu's projected total 1,117,300 population in 2030.
Link to DBEDT: series2030report-appx-3.xls

A projected 1.3 percent increase in transit ridership is a pittance compared to the underserved needs of the seniors who suffer multiple disabilities and will therefore unable to ride TheBus or TheTrain. There is no discussion of the impact that the rail system during construction and in operation will have upon the travel times of those seniors and disabled who will be unable to use TheTrain and who also find that HandiVan is inconvenient and unavailable to provide independence and reliability that is afforded to physically fit riders. This DEIS represents discrimination in the worst sense in that the aged population having multiple physical disabilities and economic hardships will suffer fewest transportation options, despite their most severe vulnerabilities.

Continuing History of Rationing Transit Bus Services

The proposed transit system's ridership will be limited by the number of buses and trains projected. Adding a train with feeder buses will reduce service access so as to further ration transit availability overall.

Ch1, 1.1 History and Conditions Leading to the Project
"The HRT&L streetcars were completely replaced by buses in 1942." DEIS, p. 1-1

Good timing, because ridership surged with less than 200 buses to 53,325,862 in 1942, 76,805,829 in 1943, 93,016,633 in 1944, and 85,245,013 in 1945 with 200 buses. In all the years since, ridership has never exceeded the 1943, 1944, 1945 numbers.

The city has failed to present FTA and the public with a true picture of TheBus performance and to compare it against the non-subsidized private operators' yields prior to the city & County of Honolulu's takeover of HRT in 1971. Ridership volume has declined and the yield per bus has likewise declined, despite the increase in population.

Statistics on TheBus performance indicates one or some of the following:
1 – that the city has rationed the number of buses in its fleet to stifle growth potential
2 – that demand for transit does not warrant additional capacity.
3 – to grow traffic congestion by withholding commuter bus capacity in order to justify a rail system.
4 – the moratorium on highway construction in order to call for the need of a rail system.

Since the City & County of Honolulu took over the transit system from HRT in 1971, the highest TheBus ridership in the 1980s — of 76,260,187 in 1984 with a 440 bus fleet — has never been duplicated in the 23 years to 2007, even though Population increased by 107,801:

1984	440 TheBus fleet	76,260,187 riders	173,319 avg riders per bus	797,800 population
2007	531 TheBus fleet	71,749,376 riders	135,121 avg riders per bus	905,601 population

From 1989 to 2006, the number of buses in TheBus fleet increased by 50 buses only, with 6 more TheBuses added in 2007:

1989 to 1992, TheBus fleet was 475 (period of the 1992 rail debate)
1995 to 2006, TheBus fleet was frozen at 525 for 11 years

Since 1973, the city has rationed commuter express bus services. Bus trips were not added commensurate with the increase of population and households in the Ewa/Waianae region.

TheBus trips have been concentrated on tourist ridership instead (Routes 8, 19, 20 and 22: Waikiki - Ala Moana Center, Waikiki – Airport & Pearl Harbor, Waikiki - Hanauma Bay.

See Excelt Worksheet: Transit Buses/Ridership

Figure 1-2 (DEIS p 1-02) fails to include relevant statistics, such as:
- Ridership volume of TheBus declined since 1984
- Stagnation of fleet size in relation to population growth, bus trips in growth areas

Compare ridership yield per bus:
1955 29,658,374 riders, avg 241,125 riders x123 buses
1956 19,900,409 riders, avg 243,093 riders x 123 buses
2006 70,384,355 riders, avg 134,065 riders x 525 buses
2007 71,749,376 riders, avg 135,121 riders x 531 buses

Figure 1-5 Population Distribution for Oahu (DEIS p1-8) fails to show the number of bus trips, schedules and routes assigned to population areas that would show the lack of or attempt to fill capacity to meet demand of new growth areas.

Figure 1-6 Employment Distribution for Oahu (DEIS p1-9) also fails to show the number of bus trips and routes assigned to growth areas.

Ch1.5 (DEIS p 1-15) Why has the city failed to present TheBus' performance result[illegible]anded transit services for the Leeward Corridor? Why are taxpayers expected to foot the exhorbitant investmer[illegible]l system whose capacity will likewise be permanently limited by the number of rail cars that are projected for this

History of Deferred Maintenance that add to higher costs ultimately

The City & County of Honolulu scoops up regular increases in taxes and fees while its infrastructure and facilities are in dilapidated conditions. Despite promises to "be honest, truthful, and accountable for the public's money," the mayor has failed to present the citizens of Honolulu with specifics and details on the worsened state of our infrastructure and costs to repair, renovate or replace same.

In his February 25, 2005 State of the City Address, Mayor Hannemann laid out in general terms the depth and magnitude of "the challenges" facing the citizens of Honolulu. Three of the many examples cited are found at http://www.co.honolulu.hi.us/mayor/soc2005.pdf

"The amount we pay each year in interest and principal stands at 194 million dollars, nearly 20 percent of our budget. Our debt service for 2006 is expected to increase by 40 mimillion dollars over this year – and that's just the increase. We've amassed a total debt of more than 3 billion dollars, about 3 thousand dollars for every man, woman and child in the City & County of Honolulu." (page 3 of 21)

"At the 40-year-old Neal Blaisdell Center, another heavily used facility, the arena is badly in need of a new air-conditioning system. Sections of the parking lot are sinking." (p 6 of 21)

"Staff shortages of 30 percent in many departments are the norm, and have not only affected our ability to properly serve the public, but had a terrible impact on the morale of our City work force, who have been told year after year 'to do more with less.'" (page 7 of 21)

The mayor (p 10) considers "filling potholes" as fixing the roads: *"Our maintenance of roads will follow a plan and a schedule consisting of three parts: The first is that, quite simply, our City road crews will be filling potholes year round and not only in emergency. The second part is called first-aid, meaning a three-quarter to one-inch overlay of asphalt on existing roadways in rural areas...The third is major reconstruction of heavily used thoroughfares."* In fact, the reconstruction plan has been meager and the heavily roads and arteries in downtown continue to be riddled "throw and go" pothole fillers.

Transit trips are projected to be longer than auto trips. Why should taxpayers underwrite high costs of rail for longer transit travel times?

Respectfully submitted,

Dale Evans
President & General Manager

Charley's was founded in 1938 by Charles S. and Helen H. Morita, and is Hawaii's oldest passenger ground transportation company. With nearly 300-plus drivers in a fleet of over 200 taxicabs, vans and limousines, Charley's serves over 2.5 million passenger trips a year on Oahu. Now in its third generation as a kama'aina small business, Charley's provides the very finest premium on-demand transportation service to the public, giving special care and attention for MediCab, Executive Car, Designated Driver for DUI Alternative, Taxi Airport Shuttle and the nation's only Japanese fluent taxi dispatch service. Charley's is the only local taxi company that has been officially recognized as an industry leader with industry and government awards.

For more information, see our website at www.charleystaxi.com

ISLAND OF OAHU

Population		Freeway	Other	Unpaved	TOTAL MILES
	1938		562.6	87.4	650
500.4	1958		861.99	58.82	920.81
630.5	1971		1172.9	39.34	1212.24
	1974		1193.5	36.26	1229.76
762.6	1985	95.95	1296.6	33.44	1425.99
836.2	1990	86.3	1367.4	33.44	1487.14
	1998	88.58	1405.1	33.44	1527.12
876.2	1999	88.58	1425.54	33.44	1547.56
	2003	88.55	1526.01	7.92	1622.48
	2004	88.55	1528.87	7.92	1625.34
834.0	2005	88.53	1531.78	7.92	1628.23

TOTAL MILES comp to 2005	
since 1958	8.88
since 1985	8.16
since 1990	8.11
since 1999	8.07

TOTAL FREEWAY MILES comp to 2005	
since 1958	
since 1985	-7.42
since 1990	2.23
since 1999	-0.05

OTHER MILES comp to 2005	
since 1958	669.81
since 1985	235.2
since 1990	164.4
since 1999	106.3

NOTE: Miles do not include Unpaved Miles
MILES statistics from State Data Book, DBEDT, early stats from print books
Table 18.02 - Length of Streets & Highways, Paved, Unpaved by Islands
http://www.hawaii.gov/dbedt/info/economic/databook/db2000/sec18.pdf

POPULATION statistics:

1990 http://www.hawaii.gov/dbedt/info/census/Folder.2005-10-13.2927/pr
2000 http://www.hawaii.gov/dbedt/info/census/Folder.2005-10-13.2927/pr

in thousands

POPULATION pecent increase compared to 2005		
since 1958	333.6	0.6667
since 1985	71.4	0.0936
since 1990	-2.2	-0.003
since 1999	-42.2	-0.048

VISITOR Arrivals	YEAR	POPULATION	Transit Buses	Ridership	Avg riders/B	REGISTERED Motor Ve	Pass Veh	Buses
	1900	58,504						
	1910	81,993		8,979,874				
	1915			11,822,269				
	1920	123,496		16,926,617				
	1925			17,436,122				
	1930	202,889		14,505,045				
	1935			12,712,052				
	1938		71	18,460,134	260,002			
	1939		81	19,224,906	237,345			
	1940	257,696	100	23,390,745	233,907			
	1941			28,814,029				
	1942			**53,325,862**				
	1943			**76,805,829**				
	1944			**93,016,633**				
	1945		200	**85,245,013**	426,225			
46,593	1950	353,020						
109,798	1955		123	29,658,374	241,125		116873	
133,815	1956		123	29,900,409	243,093		122583	
168,829	1957		198	29,786,647	150,438		130098	
171,588	1958		198	29,350,543	148,235		134902	
243,216	1959		198	29,336,610	148,165		144546	
296,517	1960	500,409	198	29,083,700	146,887		158513	
319,807	1961		193	26,116,687	135,320		169738	
362,145	1962		186	24,530,398	131,884		180077	
429,140	1963		198	22,922,296	115,769		190328	
508,870	1964		202	22,945,470	113,591		204781	
606,010	1965		176	23,190,704	131,765		220720	
710,580	1966		146	23,694,206	162,289		230550	
1,001,810	1967		146	18,301,341	125,352		238462	
	1968		143	23,514,205	164,435			
	1969		141	24,079,233	170,775			
	1970	632,624	141	30,434,906	215,850			
	1971	**645,259**	**108**	**19,413,259**	**179,752**	**332212**	**299320**	
	1972	660,125	143	31,031,764	217,005	341973	308675	732
	1973	691,400	315	36,741,009	116,638	367054	327638	1249
	1974	707,600	333	50,519,626	151,711	375440	333954	1430
	1975	718,600	350	58,295,732	166,559		336953	
	1976	728,300	350	64,585,334	184,530		352148	1872
	1977	737,000	350	66,311,882	189,463	424892	367398	
	1978	742,600	350	67,746,396	193,561	436347	376260	2251
	1979	756,000	350	68,765,000	196,471	452449	388788	2392
2,398,740	1980	764,600	400	71,601,744	179,004	454316	389576	2461
2,398,480	1981	767,600	400	73,546,802	183,867	476995		
2,589,190	1982	776,100	400	74,109,528	185,274	495629		
2,591,635	1983	789,100	395	75,051,618	190,004	515002		
2,901,320	1984	797,800	440	**76,260,187**	173,319	525599		
2,828,640	1985	804,300	440	74,816,485	170,037	544976		
3,146,030	1986	810,400	459	74,410,104	162,114	556935		
3,078,500	1987	818,400	460	74,066,369	161,014	571738	475140	3332

	1988	824,100	470	74,467,760	158,442	579998		
5,049,350	1989	831,300	475	74,964,453	157,820	599379		
5,350,940	1990	838,534	475	75,648,930	159,261	612742		4308
5,048,550	1991	850,510	475	72,815,706	153,296	613119		4309
4,884,270	1992	863,959	475	72,980,668	153,644	611513	489093	3558
	1993	870,348	495	75,557,318	152,641	604602	483237	3316
	1994	878,591	501	77,338,147	154,368	600087		
	1995	881,399	525	72,745,086	138,562	601239		
	1996	883,443	525	68,923,459	131,283	598772		
	1997	886,711	525	68,634,884	130,733	595121		
	1998	886,909	525	71,822,553	136,805	594096		
4,560,142	1999	878,906	525	66,236,147	126,164	597610		
4,719,244	2000	875,654	525	66,602,820	126,863	614985	505327	2311
4,250,863	2001	877,496	525	70,384,025	134,065	631232	519586	2269
4,276,077	2002	883,357	525	73,624,474	140,237	643810	531101	2233
4,074,141	2003	889,102	525	69,100,627	131,620	667565	553113	2002
4,464,551	2004	895,895	536	61,297,980	114,362	667565	571648	1947
4,731,843	2005	902,034	525	67,406,827	128,394	714604	594100	1908
4,688,117	2006	906,715	525	70,384,355	134,065	719606	596856	1819
4,694,750	2007	905,601	531	71,749,376	135,121	722486	599309	1770

SOURCE: Hawaii State Data Books, various editions at DBEDT Library, Honolulu

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
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KENNETH TORU HAMAYASU
DEPUTY DIRECTOR

June 11, 2010

RT2/09-299155R

Ms. Dale Evans
dale@charleystaxi.com

Dear Ms. Evans:

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

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

1. ***Consumer activity, business operations and the economy***

When the Project is fully implemented, traffic congestion will improve compared to the forecasted state of traffic congestion if the Project were not carried out. Furthermore, the Project will be built in the median of major roads and will not reduce traffic lane capacity. As shown in Table 3-14 of the Final EIS, the analysis shows that islandwide vehicle hours of delay will decrease by 18 percent compared to No Build conditions. Traffic congestion will increase at one intersection near East Kapolei Station, one near UH West Oahu Station, three intersections near the Pearl Highlands Station, and at one intersection near Ala Moana Center (Kona/Keeaumoku Streets) (as shown in Table 3-23 of the Final EIS). However, mitigation will alleviate the delay. Mitigation measures are detailed in Section 3.4.7 of the Final EIS and often recommend widening or reconfiguring traffic lanes and intersections, signalization, and planning for pedestrian flows management.

Table 2-4 of the Final EIS outlines Committed Congestion-relief Projects in the Oahu Regional Transportation Plan 2030 that will be implemented in tandem with the Project.

Comments regarding taxicab operations and statistics are noted.

Comments regarding the effects of parades on taxicab operations in Waikiki are noted.

Comments regarding the effects of congestion on social activities are noted.

Over $3 billion of roadway improvements are planned for Oahu between now and 2030 according to the OahuMPO Regional Transportation Plan. Some of those will benefit from stimulus funding under the American Recovery and Reinvestment Act, 2009. All those improvements are included in the No Build Alternative against which the Project's performance is measured. The Project will be needed to provide an alternative transportation mode to Ewa and other locations within the corridor. Roadways will continue to be heavily used, but they alone are not able to adequately meet current and future projected demand according to the analysis in Chapter 3 of the Final EIS, which covers Transportation.

2. ***Funding Sources***

The Project is designed to integrate with a feeder bus network. According to the study "Rail Transit in America," available on the American Public Transportation Association website, the cost savings provided by rail are much greater than the subsidy to rail.

Chapter 6: Cost and Financial Analysis in the Final EIS describes the financial resources anticipated to be needed to pay for the capital costs and ongoing operating and maintenance costs. As the commenter notes, the majority of the resources are anticipated to come from local sources, although Federal funds are a significant part of the Project's Financial Plan.

Section 6.6: Risks and Uncertainties in the Final EIS discusses risks and uncertainties associated with the financial analysis presented in Chapter 6. Conditions on Oahu have been accounted for in structuring the financial analysis.

The taxes used to fund the Project will provide a system that will serve the vast majority (70 percent) of the population and employment within the corridor. It also furthers the policy guidance of the City Council regarding alternative modes and support of the development of Kapolei as Oahu's "second city." The capacity of the proposed system is sufficient to accommodate very large increases in demand over time. While the present design identifies approximately 8,000 passengers in the peak hour peak direction and provides the vehicles to handle that demand, the system can handle over 50,000 people an hour by adding cars to each train and reducing the time between trains.

3. ***Cost and Oversight***

Management oversight of the Project will be undertaken in accordance with FTA's Project Management Oversight Operating Guidance (PMOOG). The FTA has multiple third-party oversight consultants to verify and propose revisions to the work done on the Project. The

process is designed to provide assurances that the work being done is consistent with the best practices in the industry and to avoid problems that have affected projects in the past.

Your comment regarding Oahu construction costs is noted. The Project's cost estimate in Chapter 6 reflects local cost factors.

The City will conduct a competitive bidding process in order to identify the necessary expertise to manage the construction and later the operation of the Project. Transit-oriented development (TOD) is not part of the Project and, other than the City establishing the appropriate policy foundation, will be primarily implemented by the private sector.

The City has hired qualified firms to support the Project's development. Consultants involved have experience with almost every major rail system development in the country as well as complementary experience in highway development work. Information about consultants is publicly available upon request

The environmental review of the Project is independent of the electoral process or results.

4. ***Public Involvement***

The public information program is typical for a project of this scope and is required by NEPA because of federal action that is involved in the project. The design of the public involvement program must allow access to information and through multiple meetings and media. This will continue through the construction period and beyond.

5. ***Managing iwi kupuna Discoveries***

The Project schedule accounts for discovery of iwi kupuna and treatment per State Historic Preservation Division regulations. The proper treatment of iwi kupuna has been coordinated with the Oahu Island Burial Council (OIBC) to ensure affected families are contacted and, when necessary, appropriate steps are taken to preserve, protect, or re-inter iwi discovered in the path of the Project. As much as possible, the effort will begin before construction to help address concerns in advance of actual construction. These efforts are memorialized in a Programmatic Agreement between the State Historic Preservation Division and the FTA with extensive participation from OIBC and other interested parties.

6. ***Transit Oriented Development***

The Project's Financial Plan does not rely on private funding of any kind. Planning and zoning around station areas will be conducted by the City's Department of Planning and Permitting under a process covered by the City's new TOD ordinance (ROH 09-4). The TOD process will happen gradually as the opportunities present themselves.

7. ***Elderly and ADA service***

Discussion of service for elderly and disabled users is included in Chapter 1 and has been accounted for in the analysis of the Project, including ridership projections. The needs of

seniors are not ignored, but commuters are still by far a significantly larger portion of the population according to the latest Census and are expected to be through 2030. As stated in Section 2.5 of the Final EIS (and reproduced below), the transit system will comply with regulations of the Americans with Disabilities Act (ADA). Elevators and escalators will be provided at all stations. In addition, level boarding will be provided to trains; therefore, stairs or lifts, as used on buses, will not be required. Those with wheelchairs, walkers, strollers, carts, or wheeled luggage will be able to access the rail platform and will have level boarding onto the train.

All buildings, facilities, and vehicles will conform to applicable Federal, State, and County accessibility guidelines and standards. HRS Section 103-50 requires that all State or County government buildings, facilities, and sites be designed and constructed to conform to the Architectural Barriers Act/Americans with Disabilities Act Accessibility Guidelines (36 CFR 1190 and 1191), issued by the U.S. Access Board, and other applicable design standards as adopted and amended by the Disability and Communication Access Board. The law further requires all plans and specifications prepared for construction of State or County government buildings, facilities, and sites be reviewed by the Disability and Communication Access Board for conformance to those guidelines and standards.

8. ***TheHandi-Van services***

TheHandi-Van services are not directly impacted by the physical construction of the fixed guideway system. TheHandi-Van is a curb-to-curb operation not requiring posted bus stops to board and alight passengers. TheHandi-Van vehicles are able to access businesses, medical facilities, and other destinations using driveways and parking lots since TheHandi-Van has flexibility in selecting a route to a destination. TheHandi-Van services may experience some delays in service during construction in certain areas due to general traffic conditions. TheHandi-Van will be impacted no more than general purpose traffic. A Maintenance of Traffic (MOT) Plan will be prepared for each segment of fixed guideway construction. The MOT Plan documents traffic conditions and operations during the construction of the fixed guideway and identifies lane closures and other traffic detours due to the project construction. A part of this process is identification of required transit modifications during construction. Any impacts to TheHandi-Van operations due to access limitations will be identified and mitigated as appropriate.

9. ***Transit bus services***

Figure 3-1 of the Final EIS offers the primary explanation why the transit ridership achieved in 1984 has not been surpassed even though the bus fleet has increased. Due to increasing traffic congestion, bus operating speeds deteriorated between 1984 and 1992. During this period, no other comparably sized bus system in the United States moved more riders per bus hour than the Honolulu service. This is according to annual reports filed by the transit operators with the Federal government.

Buses were added in Honolulu to maintain service levels. In 1989, there were 475 buses available for service as reported in The State of Hawaii Data Book 2000. The number of available buses increased to 495 in 1993 and 525 in 1995. In 2007, the total number of available buses was 531. However, increasing congestion required more buses to provide the

same level of service along the same route because the total trip time for one bus to serve the entire route was increasing. For example, Figure 1-11 of the Final EIS shows how afternoon scheduled trip times for selected routes have increased from 1992 to 2008 (Source: TheBus public timetables). The time for Route 52 (Circle Isle) to complete a trip has increased over 30 minutes, and the trip time for Ewa Beach has increased almost 60 minutes. The result has been that a bus can no longer make as many trips as it did in the past. This has required the need to add buses to routes to maintain the same interval between buses.

Over the past 10 years, the system operating speed has continued to decline. Even though the annual number of miles operated in revenue service has increased 11 percent from 1997 to 2007 per the National Transit Database, it took a 16 percent increase in the annual number of hours to operate those additional miles. This has contributed to higher operating costs.

Careful examination of Figure 3-1 of the Final EIS depicts two times when bus operating speeds slightly and temporarily increased. Both of these occasions were the result of concerted efforts to enact systematic and comprehensive improvements to TheBus system. The most recent of these was from 1999 to 2001. New service design substantially improved bus services in the Ewa and Waianae areas with the introduction of a wide array of new community circulators, local, and CountryExpress! bus routes.

The benefits of these improvements have been temporary. Increasing system usage and traffic congestion have combined to negatively impact the overall system operating speed as shown in Figure 3-1 of the Final EIS.

Since the early 1990s, the number of TheBus trips to and from Waikiki has decreased from over 1,050 trips to 994 trips today. For example, Route 8 had 189 trips to and from Waikiki in 1992; today the route has 143 trips. Similarly, Route 19 has experienced a decrease in trips to and from Waikiki from 125 to 71 trips today. The number of trips on Route 20 has decreased from 78 to 39 trips.

Figure 1-2 of the Draft EIS presents population, vehicle ownership, and vehicle miles trends for Oahu. The significant relationship in this graphic is the disproportionate increase in vehicle miles traveled compared to population and vehicle registrations. The consequence of the increase in vehicle miles traveled is congestion, causing slower operating speeds for all vehicles, including transit. This impact is depicted in Figure 3-- of the Final EIS.

The fleet size has not stagnated. However, to operate the same number of miles of service in 2007 at 13.2 miles per hour requires about 50 more buses than in 1984 when the operating speed was 14.7 miles per hour.

10. ***Population Growth***

The purpose of Figures 1-5 and 1-6 of the Final EIS is to show population and employment distribution and growth for Oahu. Appendix D of the Final EIS includes existing and future bus routes, including route numbers and frequencies.

Figure 1-6 of the Final EIS shows employment distribution and growth for Oahu. Figure 3-1 shows the performance of TheBus over time in terms of average travel speed.

Section 3.3.2 of the Final EIS also shows information related to reliability in terms of schedule adherence and "turnbacks" (when a bus does not complete its route to be able to maintain schedule on the next trip). As noted above, Appendix D of the Final EIS includes information on both existing and future bus routes, including frequencies.

The Project is designed with 240-foot station platforms that can accommodate trains with up to four 60-foot cars. Each car can hold over 160 passengers, so a four-car train can carry more than 600 passengers. The train control system is being designed to accommodate 90-second headway service, or 40 trains per hour. Forty 4-car trains in an hour could accommodate at least 24,000 passengers per hour per direction. This demand is larger than is forecast to occur in 2030. 2030 peak hour demand for the Project is expected to be about 8,100 passengers per hour in the peak direction. This demand can be accommodated by operating 3-minute headway service with a mixture of two-car and three-car trains. A fleet of approximately 150 vehicles to accommodate this demand is budgeted for purchase as part of the Project. However, as noted above, more than three times as many passengers per hour can be accommodated at some future date merely by expanding the fleet size.

11. ***Maintenance***

The Project's financial plan includes long-term maintenance costs, which are discussed in Section 6.4 of the Final EIS. Since deferred maintenance is not a desirable practice, it is not assumed as part of the financial analysis in the Final EIS.

As shown in Table 2-4 of the Honolulu High-Capacity Transit Corridor Project Travel Forecasting Results Report, 2030 a.m. peak-period travel times by transit will be less than by auto for many trips in the corridor. While travel will be faster than many trips by car, one significant advantage of the Project is that it offers reliability that cannot be guaranteed by any other travel mode available. The time from one end of the line to the other will be 42 minutes regardless of conditions on the highway, weather, or any other impediment. In effect, this means that during many days, trips on the Project will be shorter than by any other mode.

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

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Chauncey T. K. Ching
1219 Alewa Drive | Honolulu, HI 96817 | Phone 808.595.4854 | Fax 508.632.0245 | cc@cching.com

February 5, 2009

Mr. Ted Matley
FTA Region IX
201 Mission Street, Suite 1650
San Francisco, CA 94105

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

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

Dear Sirs:

I have reviewed the Honolulu High-Capacity Transit Corridor Project Draft Environmental Impact Statement/Section 4(f) Evaluation and offer the following comments. I do so from the perspective of a Honolulu resident and landowner deeply concerned about the current and future quality of life in Honolulu.

Without doubt, traffic and congestion are major issues impacting quality of life in Honolulu. These are not issues that will go away if ignored. However, based on my reading of the draft EIS, I am concerned that there are too many unanswered questions about the High-Capacity Transit Corridor that must be addressed before an informed and wise decision is forthcoming. The long term implications of such a decision are substantial and utmost care must be exercised at this time before committing future generations to decisions that will greatly influence the economic condition of residents, the City, and the State.

First, I am disappointed that the draft EIS was not released at a time that would have benefited the electorate in making choices during the November 4, 2008 election. My understanding based on press coverage is considerably different after I had the opportunity to peruse the draft EIS. For example, from the draft EIS, I learned that what has been analyzed is a corridor from Kapolei to Ala Moana. This is quite different from pre-election descriptions of the system that had corridor service beyond Ala Moana to UH Manoa and Waikiki. The cost and consequences of completing the system to include UH Manoa and Waikiki are not addressed in the draft EIS. We are looking at only

part of the system and can only make an 'act of faith' assumption that the total system can be completed within some unspecified budget. Public policy decisions of the magnitude of the Transit Corridor project cannot be treated so cavalierly. Much more rigor on the cost and consequences of the total system is absolutely essential. How, for instance, will the 40 foot platform at Ala Moana relate to buildings at Ala Moana that have heights well in excess of 40 feet?

Second, I am very concerned that the draft EIS provides insufficient information on the impact of the project on displaced residences and businesses. Instead of a detailed assessment of impacts, the draft simply implies that the impacts are minor or relatively small or limited. These inexact descriptors have no place in a document that is intended to provide unbiased information about a major public policy decision. Again, before informed and wise decisions are forthcoming, much more rigor on impacts on displaced residences and business is necessary.

Third, I am astounded by the estimates provided in Table 3-13 pertaining to daily person trips. In my opinion, the most significant category is 'Trips by Resident.' Under the 'No Build' scenario, transit daily person trips amount to 6% of total daily trips by residents. Under any of the 'build' alternatives, transit daily person trips amount to 7% of total daily trips by residents. The increased ridership with the Corridor project is at best, "underwhelming." I have a most difficult time in justifying how such an underwhelming change in ridership can justify the capital expenditure needed to implement the corridor project.

Finally, I am deeply troubled about planned revenue sources to finance the capital cost of the Corridor project - the General Excise and Use Tax Surcharge and the FTS Section 5309 New Starts program. At the time of the release of the Draft EIS, there were already clear signs that the U.S. and global economy were in a downward spiral that was unprecedented over the past 60-70 years. Today, the economic indicators are both clearer and worse, suggesting that an economic recovery is slow at best; and, federal deficits will be at all time highs for the foreseeable future. These conditions will severely impact both the Excise/Surcharge revenues and Section 5309 New Starts. In short, the revenue sources to cover capital costs are in serious jeopardy and must be considered as policy makers address the very real traffic and congestion issues in Honolulu.

In conclusion, I note that the incomplete nature of the draft EIS, inadequate estimates on the consequences associated with displaced residences and businesses, minimal gains in transit ridership by residents, and likely serious shortfalls in revenue sources for capital expenditures strongly suggest that City policy makers reopen its search for more modest and more effective solutions to the very real traffic and congestion issues we face in Honolulu.

I thank you hearing my concerns and trust that you will do what is best for current and future residents of Honolulu.

Sincerely,

Chauncey Ching

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, 3RD FLOOR
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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT2/09-298953R

Mr. Chauncey T.K. Ching
1219 Alewa Drive
Honolulu, Hawaii 96817

Dear Mr. Ching:

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

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

The NEPA process, including publication of the Draft EIS, began in 2007. In the summer of 2008, when the City Council decided to place the measure on the ballot, the schedule for the Draft EIS had already been established. Various design, agency coordination, and approval steps were required prior to publication of the Draft EIS. The normal distribution schedule was accelerated by the FTA and the City to ensure availability of the information prior to the general election.

City Council Resolution 07-039 directed that the first construction project be fiscally constrained by anticipated funding sources and to extend from East Kapolei to Ala Moana Center (the Preferred Alternative. The discussion of the alternatives considered is included in Chapter 2 of this Final EIS and the Alternatives Analysis.

The Project has logical termini at East Kapolei and Ala Moana Center and independent utility from any extensions that may be constructed in the future. The proposed future extensions to West Kapolei, Salt Lake Boulevard, Waikiki, and UH Manoa are discussed in the cumulative impacts sections of Chapters 3 and 4 of the Final EIS. The future extensions are not part of this Project; thus, they are not required to be evaluated under Chapter 343 of the Hawaii Revised Statutes and NEPA. Under NEPA, environmental analysis is only required when there is a proposed action by a Federal agency. Here, because the future extensions are not proposed for implementation at this time, they are not part of the Project studied in the Final EIS. It would be premature to undertake an environmental analysis of the extensions (beyond the cumulative impacts analysis) because they are not part of the proposed action to be taken by the City and FTA. If the future extensions are proposed for implementation in the future, environmental analysis of the extensions and appropriate alternatives will be undertaken at that time.

Future extensions are not precluded by the Project, as discussed in the Draft and Final EISs. The 35-foot-high station at Ala Moana Center is a practical solution for the first construction project to serve the shopping center and area properties. In the future, when funding is available, the extension would be designed to best accommodate the possibilities available at that time. The high-level option over the shopping center is still available and does not obviate the need for the 35-foot option built now. There are operating plans for the system that will continue to rely on the 35-foot station even after an extension is built.

For your information, as stated in Section 4.8.3 of the Final EIS, the station and guideway will be located between the Ala Moana Center and mid- to high-rise buildings, and will not substantially change the view from adjacent offices and residences.

Regarding the second point in your letter, acquisitions, displacements, and relocations were discussed in Section 4.3 of the Draft EIS and Section 4.4 of the Final EIS. Every property owner that will be partially or fully acquired due to the Project has been notified. A full list of impacted properties, parcel by parcel, is available in Appendix C of the Final EIS.

To address your third point, the 1 percent referenced is an islandwide figure that includes all travel during the day, including short trips in neighborhoods and trips in the North Shore, Kaneohe or Hawaii Kai which are not directly served by the Project. The most visible benefit of transit is within a corridor and during the peak times of the day. Table 3-12 shows daily islandwide trips, while Figure 3-11 in the Final EIS shows transit shares of home-based work trips during the a.m. two-hour peak period for key travel markets. As shown in Table 3-12, on a daily, islandwide basis, transit use is not expected to increase substantially. However, as shown in Figure 3-11, there is a substantial increase in transit trips during the a.m. peak period within the study corridor because of the Project. As stated in Section 3.4.2 of the Final EIS, for many travel markets, the transit share for trips under the Project would double or triple the share occurring under the No Build Alternative. For example, the commute-to-work transit share of the Kapolei to Downtown Honolulu travel market would increase from 23 percent under the No Build Alternative to 60 percent under the Project. In other words, more than half of the people going from Kapolei to Downtown for work in the morning would use transit with the Project, compared to only a quarter without the Project.

To address your final point, the capital plan for the project presented in Section 6.3 of the Final EIS considers the economic downturn. Section 6.6 of the Final EIS describes risks and uncertainties associated with these funding assumptions. The City will continue to monitor and update the revenue forecasts as the Project proceeds through FTA's New Starts process.

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

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

From: Yoshioka, Wayne [wyoshioka@honolulu.gov]
Sent: Friday, February 06, 2009 12:47 PM
To: Yadao, Elisa; Nishioka, Edward M.
Cc: Miyamoto, Faith; Hamayasu, Toru
Subject: FW: Objections to Rail DEIS
Importance: High

Aloha kakou!

More comments.

A hui hou,

Wayne

From: dlching@aol.com [mailto:dlching@aol.com]
Sent: Friday, February 06, 2009 11:09 AM
To: Yoshioka, Wayne; ted.matley@fta.dot.gov; governor.lingle@hawaii.gov
Subject: Objections to Rail DEIS

Dear Governor Lingle, Mr. Yoshioka and Mr. Matley,

I'm writing to express grave concerns over deficiencies in the DEIS for Honolulu's heavy rail system.

I found the draft EIS statement to be deficient in numerous areas and have specific questions and concerns about the following:

1. How will this project affect current traffic congestion?
2. The comparison of energy use of rail to bus should be done for hybrids, not traditional combustion engine as this report appears to have done.
3. It is unclear how congestion will be remedied during the many years of construction. Lanes of traffic are to be eliminate in certain areas. Where and when this will happen, and what will happen to congestion in those areas?
4. Will there be bike racks on the train and where will they be located? Will bikes be allowed on the train? Will there be a place for surfboards? What about luggage for airport passengers? What about construction workers' tools?
5. The impacts of relocations has not been adequately addressed for important food producers like Aloun Farms, 14 community facilities that will be "partially acquired" as well as small businesses that will not survive a move or reduction in operations. Historic and cultur al sites are also not adequately addressed.
6. There is insufficient information on plans to mitigate noise at the 16 schools that are adjacent to the alignment. How will the noise affect the learning environment?
7. The analysis of job creation does not adequately analyze job losses. There is no mention of what will happen to the jobs that are lost due to businesses downturn during construction?
8. The report does not adequately assess the potential harm an elevated rail system does

to our unique tourist industry and the image of Oahu. How will the tourists see noise and visual impacts of heavy rail? Will the more idyllic neighbor Islands absorb an even larger share of tourism and hurt our County's revenues?

9. The provisions for managing with lower than projected ridership and tax revenue support are inadequate.
10. The plan is also deficient in outlining how corrosion will be mitigated. BART in the SF bay are is made of aluminum. What will happen to steel in a salt air environment? An evaluation of steel vs. aluminum is lacking in this report.
11. Likewise, the DEIS plans for mitigation of graffiti on the concrete support pillars, stations and cars is inadequate. This deficiency will impact the accuracy of=2 0predicting the future cost of the project maintenance.
12. Finally, I have concerns that the ADA issues have not been adequately assessed. How long will the doors be open for to access the train? How will an elderly or handicapped person be able to get on and off the train in this time period? Please provide detailed plans on handling handicapped access. How does this effect the efficiency of the train and speed of commute?

Thank you for your thoughtful consideration of my concerns. Please feel free to call me if you have any questions about this letter.

Aloha,

Donna L. Ching
Honolulu, Hawaii
(808) 944-4070

DEPARTMENT OF TRANSPORTATION SERVICES

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010 RT10/09-337512

Ms. Donna L. Ching
dlching@aol.com

Dear Ms. Ching:

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

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

1. A travel demand forecasting model was used to forecast traffic conditions at six screenlines during the a.m. and p.m. peak hours. The model showed that in 2030 the Project will reduce congestion at these locations by up to 11 percent during the a.m. peak hour and up to 10 percent during the p.m. peak hour over the 2030 No Build Alternative (as shown in Tables 3-9 and 3-10 of the Final EIS). In addition, vehicle hours of delay will decrease by 18 percent with the Project compared to the 2030 No Build Alternative (Table 3-14 of the Final EIS).

As shown in Table 3-23 of the Final EIS, project-related traffic will affect delay at six intersections in the corridor. The Project includes measures that will mitigate these effects (as discussed in Section 3.4.7 of the Final EIS). As a result, the Project will not affect traffic congestion.

2. The energy use analysis presented in the Draft and Final EISs includes all vehicles currently operating on Oahu, as presented in Section 4.11.1 in the Final EIS, "The analysis of operational energy consumption on Oahu was based on the transportation analysis prepared for the Project. Changes in overall transportation energy use for vehicles traveling on Oahu were assessed using daily [vehicle miles traveled] and speed values calculated from the transportation demand forecasting model." Hybrid vehicles do not account for a large enough percentage of the vehicle mix to change the project-wide energy consumption calculations.

3. As discussed in Chapter 3 of the Final EIS, a Maintenance of Traffic (MOT) Plan will identify measures to mitigate temporary construction-related effects on transportation. The contractor will develop the MOT Plan with approval from the City and the Hawaii Department of Transportation. The MOT Plan will address roadway closures for streets identified in Table 3-27 of the Final EIS. Additional temporary lane closures will occur during non-peak hours so that effects on heavy commuter traffic will be minimized. As stated in Section 3.5.7 of the Final EIS, an extensive public information program will be implemented to provide motorists with a thorough understanding of the location and duration of construction activities, as well as anticipated traffic conditions.

As stated in Section 3.4.3 and shown in Table 3-21 of the Final EIS, there will be no permanent reduction in the number of roadway travel lanes with the Project.

4. Bike racks will be available at all stations. Bicycles, surfboards, luggage, and construction workers' tools will be allowed on trains subject to some restrictions during heavy peak periods, according to policies that are yet to be developed. These items will be allowed on trains as long as they do not impede other passengers or pose safety risks.

5. The Hoopili site, which is one of the two site options being considered for a maintenance and storage facility, is located within Aloun Farms. The other site is near Leeward Community College and is the site of a former Navy fuel drumming operation. The Navy Drum site is the preferred site, and discussions are under way with the Department of Hawaiian Home Lands to acquire it. If the Project can acquire this site, the impact on agricultural lands on Oahu will be much less than is described in the Draft and Final EISs. Aloun Farms' headquarters, located at the site of the other proposed maintenance and storage facility, would not have to move

Relocations are discussed in Section 4.4 of the Final EIS, and impacts to archaeological, cultural, and historic resources are discussed in Section 4.15 of the Final EIS. A partial acquisition typically is either a narrow strip of land or a more substantial portion of a large parcel. It is assumed that for the properties that will be partially acquired, existing land uses will not change. For residential properties, if the right-of-way line comes within approximately five feet of a residential structure, it is considered a full acquisition. If the right-of-way line is more than five feet, it is generally considered a partial acquisition. For commercial properties, including situations where the commercial property could lose its function, full acquisition was considered. Businesses and residents from whom property is to be acquired will be treated according to the requirements of the Federal Uniform Relocation Assistance and Real Property Acquisition Policies Act. This Act provides for purchase at fair market value and includes relocation

assistance to those affected. The Act provides that those in need of relocation must be placed in comparable (living or business) quarters.

6. A noise barrier on the platform of the track is included as part of the project design and will reduce noise levels along the project alignment. Moderate impacts will occur at upper floors of a few high-rise buildings (as shown in Table 4-18 in the Final EIS). With the recommended mitigation in place (sound absorbing material and wheel skirts), the noise analysis indicates that the new noise generated by the Project will be lower than the existing noise levels in most places. No noise impacts are predicted for any schools along the project alignment. For schools and other noise-sensitive locations that do not have nighttime sleep activities, the FTA Transit Noise and Vibration Impact Assessment compares the existing maximum-hour noise level to the maximum-hour noise that the transit line will produce by itself. For the Salt Lake Alternative, between the Aloha and Ala Lilikoi Stations, the existing current maximum-hour Leq noise level at the school ranges from 60 to 65 dBA. A project noise level of 63 dBA or above would be an impact. The Project is predicted to have a maximum-hour Leq noise level of 51 dBA. Noise impacts are not predicted at schools and maximum-hour noise levels will stay the same.

In addition, construction noise will be a short-term impact, and all local noise ordinances will be followed to reduce noise annoyance to residences and schools.

7. An analysis of construction impacts to businesses is provided in Section 4.17.1 of the Draft EIS, 4.18.1 of the Final EIS, and Section 5.2.2 of the Economics Technical Report. This report is available at the City and County of Honolulu and DTS offices, as well as on the Project website (www.honolulutransit.org). Primary construction impacts are anticipated to result from inconveniences and disruptions to adjacent residents, businesses, and business customers that are inherent in any major construction project and include the following:

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

Section 4.18.1 of the Final EIS states that proposed mitigation to reduce adverse economic hardships for existing businesses along the project alignment during construction may include the following:

- *Coordinate construction planning and phasing with nearby property owners and businesses.*
- *Develop a public involvement plan prior to construction to inform business owners of the construction schedule and activities.*

- *Minimize the extent and number of businesses, jobs, and access affected during construction.*

- *To the extent practicable, coordinate the timing of temporary facility closures to minimize impacts to business activities, especially those related to seasonal or high sales periods.*

- *Minimize, as practical, the duration of modified or lost access to businesses.*

- *Provide signage, lighting, or other information to indicate that business are open.*

- *Provide public information (press releases, newsletters) regarding construction activities and ongoing business activities, including advertisements in print and on television and radio.*

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

- *Provide advance notice if utilities will be disrupted and schedule major utility shutoffs during non-business hours.*

Overall, the Project is estimated to increase jobs during the nine years of construction to an average of about 10,000 per year, see Table 4-34 in Final EIS.

8. Negative impacts of the rail system with respect to property values and tax impact, are detailed in the Economics Technical Report. Section 4.2.2 of the Draft EIS and Section 4.3.2 of the Final EIS summarize the impact of railway construction on Real Property Taxes.

Aesthetic effects of the system are described in Section 4.8 of the Final EIS. The Project is substantially different from systems in New York and Chicago, as it will have a different structural design. There is no evidence that the Project will have a negative impact on the tourism industry. Section 4.19 of the Final EIS states that the economic forecast is for continued steady growth. Planned projects are intended to continue to encourage and enable economic growth in the region. Continued focus on tourism is anticipated.

The Project will offer tourists a transportation alternative that links them directly with many key destinations and reduces the need for a car. Table 3-13 of the Final EIS shows daily person transit trips by purpose, broken down for residents and visitors. As seen in this table, transit trips for both groups increase with the addition of the Project compared to the No Build Alternative. Daily resident person trips by transit increase 24 percent with the Project compared to without, while daily visitor person trips by transit increase 19 percent with the Project compared to without the Project in 2030. As stated in Section 3.4.2 of the Final EIS, approximately 9,900 visitors are expected to use the system daily, of which 1,800 are to or from the airport.

The island's unique visual character and scenic beauty were considered in the visual and

aesthetic analysis presented in the Draft and Final EISs. The Project will be set in an urban context where visual change is expected and differences in scales of structures are typical. As part of the design process, the City has developed design principles, which are identified in the Honolulu High-Capacity Transit Corridor Project Compendium of Design Criteria (RTD 2009m) that will be implemented in final design to minimize visual effects of the Project. For example, guideway materials and surface textures will be selected in accordance with generally accepted architectural principles to achieve effective integration between the guideway and its surrounding environment. Landscape and streetscape improvements will mitigate potential visual impacts, primarily for street-level views.

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

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

- *Develop and apply design guidelines that will establish a consistent design framework for the Project with consideration of local context.*
- *Coordinate the project design with City TOD planning and DPP.*
- *Consult with the communities surrounding each station for input on station design elements.*
- *Consider specific sites for landscaping and trees during the final design phase when plans for new plantings will be prepared by a landscape architect. Landscape and streetscape improvements will serve to mitigate potential visual impacts.*

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

It should also be noted that the Project will provide users, including tourists, with expansive views from several portions of the corridor by elevating riders above highway traffic, street trees, and low structures adjacent to the alignment. The fact that this will be the only island with high capacity transit, with an efficient airport connector, may attract more tourists who value the convenience, potential cost savings, and decreased travel time between various tourist destinations along the Project's alignment. The Project is a rapid rail system. In Section 4.8.3 of the Final EIS, specific environmental, architectural, and landscape design criteria are listed that will help minimize visual effects of the Project.

9. Both ridership and financial discussions in the Final EIS address concerns about the uncertainties associated with ridership and financial markets. Ridership projections for the forecast year of 2030 have been developed using the travel demand model used by the Oahu Metropolitan Planning Organization (OahuMPO), which was calibrated against collected traffic and transit ridership information and then validated against recent counts to be sure it properly

represents travel activity in the transportation system (Section 3.2.1 of the Final EIS). An on-board transit survey was completed in December 2005 and January 2006, and the latest socioeconomic information available as of October 2008 was incorporated. Traffic counts were collected in 2005, 2007, and 2008. The OahuMPO model is based on "best practices" for urban travel models in the U.S. and is consistent with consultation with the FTA. The model is updated approximately every five years to reflect changes in land use, socio-economic conditions, and transportation network improvements. The model is approved by the OahuMPO Technical Advisory Committee. The model is based upon a set of realistic input assumptions regarding land use and demographic changes between now and 2030 and expected transportation levels-of-service on both the highway and public transit system. Based upon the model and these key input assumptions, approximately 116,000 trips per day are expected to use the rapid transit system on an average weekday in 2030. Since the Draft EIS was published, the travel demand model has been refined by adding an updated air passenger model (which forecasts travel in the corridor related to passengers arriving or departing at Honolulu International Airport), defining more realistic drive access modes (driving alone or car pooling) to project stations and recognizing a more robust off-peak non-home-based direct demand element (trips that do not originate at home) based on travel surveys in Honolulu.

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

The capital plan for the Project is presented in Section 6.3 of the Final EIS, which includes a description of the amount of funding anticipated from various sources. The capital plan takes the current economic downturn into account. Section 6.6 of the Final EIS describes risks and uncertainties associated with these funding assumptions. The financial plan is a dynamic document that will be updated as conditions warrant.

10. Bay Area Rapid Transit (BART) is a steel-on-steel system, the same type as proposed for Honolulu. The issue of corrosion was a topic discussed by the technology panel, which found that corrosion is not a significant issue with steel-on-steel systems in any kind of climate. Steel-on-steel systems exist throughout the world, on other islands, in high-humidity climates, volcanic environments, etc. and they operate without issues. Nonetheless, corrosion is part of the design considerations to ensure the system performs as effectively as possible. The vehicle shell for the BART system is made of aluminum; however, the vehicle for Honolulu has not yet been designed, so it could be aluminum or some other equally effective material.

Corrosion-control measures will be applied to the Project's fixed-steel facilities and neighboring utility structures to provide proper operation over their lifetime. These measures include the following:

- *Protective coating specification for steel aerial structures*

- *Coating specification for stations*
- *Preventive measures against stray current corrosion*
- *Corrosion-control design of transit underground utilities and neighboring utilities owned by others*

11. Section 4.6.3 of the Final EIS describes potential safety and security issues once the Project is operating. The discussion notes that to reduce the potential for crime, the FTA requires the development and implementation of a Safety and Security Management Plan for new fixed guideway projects (49 CMR 633). Graffiti is one of the safety and security issues that will be addressed. The Project is looking into using graffiti-resistant materials, where possible, to minimize graffiti. Graffiti removal is an anticipated maintenance activity and is reflected in project costs.

12. The transit system will comply with the Americans with Disabilities Act (ADA) requirements. Elevators and escalators will be provided at all stations. In addition, platforms will be level with trains for boardings; therefore, stairs or lifts, as used on buses, will not be required. The system operation plan considers all ADA requirements. Dwell time is anticipated to be 30 seconds at the station. This dwell time is incorporated into the station-to-station travel times presented in Table 3-16 of the Final EIS. As shown, travel from the East Kapolei Station to the Ala Moana Center Station will take 42 minutes.

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

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Status :	Initial Action Needed
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Submission Method :	Website
Other Submission Method :	
Submission Date :	12/05/2008
Submission Content/Notes :	You should do Charles K. Djou plan and start at downtown and work your way to Aiea. Doesn't make sense to go from Kapolei to Waipahu. Ridership is going to be much greater from going into downtown from Aiea or Stadium then Kapolei to Waipahu. That way you will be making money or or at least breaking even on operating costs with high ridership.

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-331290

Ms. Melissa Ching
98-1234 Iliee Place
Aiea, Hawaii 96701

Dear Ms. Ching:

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

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

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

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

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

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

- *Balance expenditure of funds to minimize borrowing.*

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

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

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

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

DRAFT EIS FOR RAIL TRANSIT SYSTEM

1) What is the plan for the effect of rail construction on water, sewer, gas and electric utilities? Will there be disruptions of service? Does the budget cover all these contingencies?

2) If ridership turns out to be much lower than forecast, are fees going to be increased? Are taxes going to be raised? What is the forecast for number of riders per day (best estimate, range from low to high)?

3) Is corrosion of rail cars an issue to be concerned about?

4) In case of disaster, such as a hurricane or tsunami, will the train operate?

5) How are viewplanes affected by rail? Are the aesthetics of the structure and each station adequately addressed in the DEIS?

6) How are the schools (and the students in those schools) along the route going to be affected by the overhead structure, the continuous high current exposure and the intermittent noise and vibrations?

7) Will Aloun farms be relocated? If so, where will they go?

8) Will there be washrooms, convenience stores, and vending machines at the stations? Will the platforms have adequate seating?

9) Will bikes, surfboards and luggage be allowed on the train? Will there be any restrictions on time of day (i.e. not allowed during commute hours)? What is the size limitation?

10) Lanes will be taken away during construction. Where are the lane closures and what is the duration of closure? Are there traffic rerouting plans?

11) Bus routes will change. Will the public be notified of the changes and accommodations made for temporary stops? What happens to the express bus routes?

12) When and at what cost will spurs to the airport, UH-Manoa and Waikiki be built?

13) What pedestrian and bicycle amenities will be designed and built in or near transit stations?

14) Will there be seamless connections to bus service, bikeways, and other modes of transportation? Will there be park-and-ride lots near the transit stations? Will those lots have priority (i.e. be built first) over bus, bike and pedestrian access to the stations?

15) Will there be assistance devices for the elderly and handicapped? Will fares be subsidized to encourage ridership? If so, what is the target group for those subsidized fares? What percent of the cost of rail (construction, maintenance and interest paid on bonds) is expected to be paid with fares? What if fares do not meet this percentage? Will fares and/or taxes be raised? By how much?

16) Will there be subsidized transit passes for government employees? How about private companies doing the same for their employees? Will businesses that provide free parking to employees be required to offer an equivalent monetary amount to those who choose not to drive?

17) How will rail promote mixed-use, transit-oriented development that revitalizes established urbanized areas to focus new growth where infrastructure and access to jobs, shopping, services and recreation already exist?

18) What is the amount of carbon dioxide emitted by rail per person-mile when at maximum capacity? How does this compare to a Prius (50 mpg) with a solo driver? What is the maximum capacity of the proposed rail system?

19) How much energy does rail use (in kwh) per person-mile when at maximum capacity? Again, how does this compare to a Prius (50 mpg) with a solo driver?

20) Where will the power come from to operate the rail system? Will HECO build a power plant to run the rail? If not, is there enough current base load capacity to operate rail?

21) What are the plans (if any) to run rail on renewable sources of energy? I do not include palm oil as a renewable source of energy. Is photovoltaic, wind, concentrated solar, wave, methane from the landfill or OTEC being considered at all? If not, why not?

22) Will energy from HPOWER be used to power the rail system? If so, how much energy? Will there be any extra air pollution from HPOWER if this occurs?

Thank you for answering my questions on rail. Please send answers to:

Randy Ching
1560 Kanunu St, #818
Honolulu, HI 96814

Telephone: 808-942-0145
Email: oahurandy@yahoo.com

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WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT10/09-336274

Mr. Randy Ching
1560 Kanunu Street, #818
Honolulu, Hawaii 96814

Dear Mr. Ching:

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

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

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

1) *DTS will coordinate with all utilities prior to construction with regard to relocations and disruption of service. Section 4.18 of the Final EIS explains that construction effects will be temporary and limited. Businesses will be provided with advance notice if utilities are to be disrupted. Major utility shut-offs will likely be scheduled to occur during non-business hours. Costs related to utilities that require relocation are part of the overall budget for the Project.*

2) *By City Council's current policy, ridership on the entire transit system is expected to pay for between 27 and 33 percent of the annual operating and maintenance*

costs. The City Council will adjust the fare to maintain that level of revenue. The balance of the operating costs will be part of the City's annual budget, which includes sources currently used for TheBus: Federal funding and subsidies from the City's General and Highway Funds.

The amount of service provided will be scaled to generally match the demand. If the service attracts fewer riders than expected, then less service may be provided by adjusting headways or train length, resulting in lower-than-expected operating and maintenance costs. The ridership estimate is presented in Section 3.4.2 of the Final EIS. The forecast is that 116,000 people will ride the system every day. The range of the forecasts based on the uncertainty analysis is from 95,000 to about 130,000. This is very high ridership, which further indicates how much the system is needed currently and in the future.

3) *Corrosion-control measures will be applied to the Project's fixed-steel facilities and neighboring utility structures to provide proper operation over their lifetime. These measures include the following:*

   - *Protective coating specification for steel aerial structures*
   - *Coating specification for stations*
   - *Preventive measures against stray current corrosion*
   - *Corrosion-control design of transit underground utilities and neighboring utilities owned by others*

4) *The system will be designed to meet earthquake and hurricane design standards. The system will have an upper limit on operating wind speed. Vehicles will be stored during weather events that exceed the operating limits.*

5) *The viewpoints analyzed in this Final EIS Section 4.8 are intended to incorporate a variety of perspectives (e.g., vehicular pedestrian, and elevated) and a wide range of views. Visual simulations of the Project were developed to represent the range of scale and spatial relationships of project elements to other objects. Some of the simulations are also intended to represent view corridors identified as protected resources in pertinent policy documents. The simulations serve several purposes: they were used to evaluate visual and aesthetic consequences of the Project, demonstrate the potential for mitigation, and provide a means of communicating the findings of the analysis. Generally, simulations were prepared for viewpoints where the Project would have a comparatively greater visual effect. A greater emphasis was placed on identifying views and preparing view simulations toward the Project, because this best represents what most viewers would see and the greater variety of views that would be experienced.*

   In Section 4.8.2 of the Final EIS, the Project's visual effects in the Ewa Plain are discussed under the "East Kapolei to Fort Weaver Road Landscape Unit" heading. Visual effects in the Pearl City area, including East Loch, are discussed

under the "Fort Weaver Road to Aloha Stadium Landscape Unit" heading. Visual effects in the Salt Lake area and Kalihi are discussed under the "Aloha Stadium to Kalihi Landscape Unit" heading. Visual effects along Dillingham Boulevard, in Downtown, and at Irwin Park are discussed under the "Kalihi to Ala Moana Center Landscape Unit" heading. Throughout these landscape units, the potential for the guideway and stations to block protected mauka-makai views and vistas of features and landmarks will vary. For an overview of these landscape areas, please review Figure 4-16 in the Final EIS.

Public view planes that are assessed in Section 4.8 of the Final EIS include views along streets and highways, mauka-makai view corridors, panoramic and significant landmark views from public places, views of natural features, heritage resources, and other landmarks. The City's General Urban Design Principles state that "[s]uch public views shall be protected by appropriate building heights, setbacks, design and siting controls" and that "[t]hese controls shall be determined by the particular needs of each view and applied to pubic streets and to both public and private structures." The guideway and some stations will partially block mauka-makai public views from streets that intersect the alignment (see Section 4.8.3 of the Final EIS). RTD will coordinate with the City to identify the particular needs of each view; however, changes to some views will be unavoidable. Depending on the degree of view obstruction or blockage, some view changes will be substantial (see Table 4-9 in the Final EIS for those viewpoints with a "significant" visual impact rating). The viewer's response to this change will vary with exposure and sensitivity and depend on the alignment orientation, guideway and station height, as well as the height of surrounding trees and buildings.

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

View changes will be less notable in wider vistas or panoramic views where the project elements serve as smaller components of the larger landscape. Generally, the project elements will not be dominant features in theses views. As stated in Section 4.8.3 of the Final EIS, the measures listed below will be included with the Project to minimize negative visual effects and enhance the visual and aesthetic opportunities that the Project will create:

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

phase when plans for new plantings will be prepared by a landscape architect. Landscape and streetscape improvements will serve to mitigate potential visual impacts

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

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

6) *No noise impacts are predicted at schools along the alignment. In addition, no vibration effects are projected for the Project.*

7) *One of the two site options for a maintenance and storage facility presented in the Final EIS is located within Aloun Farms. The other potential site is near Leeward Community College and is the site of a former Navy fuel drumming operation. This is the preferred site. The impact on agricultural lands on Oahu will be much less than is described in the Final EIS if this site is selected. Aloun Farm's headquarters would not have to move if the preferred site near Leeward Community College is selected. However, Aloun Farms' land is leased from D.R. Horton and may be developed in the future. If Aloun Farms is to be relocated, the City will follow the requirements of 49 CFR Part 24, Subpart D – Payments for Moving and Related Expenses, as well as the Uniform Relocation Assistance and Real Property Acquisition Policies Act.*

8) *Each station will have a secured public restroom. Patrons will ask the station attendant for access to the restroom. DTS does not intend to compete with private enterprise by placing retail within stations, although station plazas are designed to complement nearby private development. Final internal configurations of stations will be completed as station planning is finalized.*

9) *Bicycles, luggage, and surfboards will be allowed on fixed guideway vehicles, as regulated by bicycle and luggage policies to be developed. The policies will establish restrictions regarding times of day and size limitations.*

10) *Table 3-27 in the Final EIS describes the location of temporary lane closures resulting from project construction. As discussed in Chapter 3 of the Final EIS, a Maintenance of Traffic (MOT) Plan will identify measures to mitigate temporary construction-related effects on transportation. The contractor will develop the MOT Plan with approval from the City Department of Transportation Services and the Hawaii Department of Transportation. The MOT Plan will address roadway*

closures for streets identified in Table 3-27 of the Final EIS. Additional temporary lane closures may occur during non-peak hours to minimize effects on heavy commuter traffic.

11) *Existing and future bus routes, including route numbers and frequencies, are provided in Appendix D of the Final EIS. As noted in Section 2.5.6 of the Final EIS, "bus service will be enhanced and the bus network will be modified to coordinate with the fixed guideway system." Some existing bus routes, including peak-period express buses, will be altered or eliminated to reduce duplication of services provided by the fixed guideway system. As stated in Section 3.5.7 of the Final EIS, some bus stops will be temporarily relocated during construction and some bus routes will be rerouted. A public information program will be conducted to inform transit riders of service changes during construction.*

12) *The Project has logical termini and independent utility from any extensions that may be constructed in the future. The future extensions to East Kapolei, Salt Lake Boulevard, Waikiki, and UH Manoa are discussed in the cumulative impacts sections of Chapters 3 and 4 of the Final EIS. The future extensions are not part of the Project; thus, they are not required to be evaluated under Chapter 343 of the Hawaii Revised Statutes and NEPA. Under NEPA, environmental analysis is only required when there is a proposed action by a Federal agency. Here, because the future extensions are not proposed for implementation at this time, they are not part of the Project studied in the Final EIS. It would be premature to undertake an environmental analysis of the extensions (beyond the cumulative impacts analysis) because they are not part of the proposed action to be taken by the City and FTA. If the future extensions are proposed for implementation at some time in the future, environmental analysis of the extensions and appropriate alternatives will be undertaken at that time. The timing and cost of possible rail extensions to West Kapolei, Salt Lake Boulevard, Waikiki, and UH Manoa have not been determined at this time.*

13) *As stated in Section 3.4.2 of the Final EIS, several stations will be located at or near existing or planned bicycle facilities. Each station will have facilities for parking bikes, and each guideway vehicle will be designed to accommodate bicycles. Sidewalks and crosswalks are currently available at stations or will become available as streets and sidewalks are built in developing areas. As stated in Section 2.5.5 of the Final EIS, Pedestrian and Bicycle Access, design criteria developed for stations place the highest emphasis on walk and bicycle access. The Design Criteria provide specific direction for pedestrian and bicycle access features at stations. For example, the criteria state that adequate pedestrian circulation routes shall be provided with an emphasis on avoiding pedestrian and vehicular conflicts and enabling good visibility to each station entrance. This emphasis will be complemented by distinct and clear graphic signage. For bicycle access, the criteria include language stating that racks shall be placed at the station plaza near the station entrance where public visual surveillance is possible and/or where closed circuit television monitoring is present.*

14) There will be seamless connections from the fixed guideway to buses, bikeways, and other modes of transportation. Section 3.4.2 states that the bus network will be restructured to provide access from surrounding communities to the fixed guideway with more frequent bus service. In addition, because of the high frequency of the fixed guideway service (three-minute headways between trains during peak periods), riders transferring from buses to the fixed guideway will experience minimal wait times. Riders transferring from the guideway service to buses will benefit from improved frequencies on existing bus routes serving stations. In addition, several new routes with high frequencies will be provided as feeders to the guideway system. Existing and future bus routes, including frequencies, are provided in Appendix D of the Final EIS.

As stated previously, access to stations will be enhanced by accommodating bicyclists and pedestrians. Several stations will be located at or near existing or planned bicycle facilities, and sidewalks and crosswalks will be provided. As stated in Section 2.5.7 of the Final EIS, park-and-ride facilities will be constructed at East Kapolei, UH West Oahu, Pearl Highlands, and Aloha Stadium. These stations have the highest demand for drive-to-transit access. The size and capacity of each park-and-ride facility are provided in Table 2-8 in the Final EIS. Priority is given to bicycle and pedestrian access.

15) The transit system will comply with Americans with Disabilities Act (ADA) requirements. Elevators and escalators will be provided at all stations. Also, level boarding will be provided to trains; therefore, stairs or lifts, as used on buses, will not be required to board the trains. Park-and-ride facilities will have handicapped spaces with ADA-compliant ramps and paths connecting the lots to the stations. In addition, sidewalks and bridges will be at least 8 feet wide; pedestrian crossings will be signalized; and curb cuts will have tactile surfaces. For riders with low vision, there will be texture changes in the pavement to identify important areas, including the edge of the platform. Braille and/or raised letter print and large print signage and verbal announcements will also be provided. For riders with hearing loss, directional, informational, and variable message signage will be provided at all stations.

The current fare policies for TheBus, including reduced fares for elderly, disabled, and other groups, will be continued for the fixed guideway system. As detailed in Chapter 6 of the Final EIS, between 27 and 33 percent of the operating cost for the entire transit system, including buses, will be covered by fares. Section 6.4.2 of the Final EIS describes the funding sources to pay for ongoing operating and maintenance costs associated with maintaining the resulting transit system in a state of good repair. Operating and maintenance costs will be paid for from the same funding sources currently used for TheBus: Federal funding, fare revenues, and subsidies from the City's General and Highway Funds. Section 6.6 of the Final EIS describes risks and uncertainties associated with these funding assumptions.

16) As described in Chapter 2 of the Final EIS, the bus and rail systems will have a unified fare structure, including monthly passes that work for both modes. Current fare policy will be continued. It is up to individual employers to provide parking as well as subsidized passes to employees.

17) As stated in Section 4.19.3 of the Final EIS, the Project, when combined with supportive public policies and favorable real estate market conditions, could attract transit-supportive development (TSD) and TOD within station areas. TSD includes land uses such as office space and multi-story residential buildings near transit stations. Office uses generate more transit riders per square foot of space than any other land use. TOD is more intensive and deliberately planned to integrate with transit and generally includes pedestrian-oriented moderate- to high-density mixed uses.

In March 2009, the City Council approved and the Mayor of Honolulu signed Bill 10 (2008) (Ordinance 09-4), which defines the City's approach to TOD around fixed guideway stations. New zoning regulations for TOD will address parking standards, new density provisions, open space, and affordable housing. Financial incentives for TOD could include public-private partnerships, real property tax credits, and infrastructure financing. While the Project is coordinating with City and State agencies to encourage development of enhanced pedestrian and bicycle facilities and other land use changes near stations, the actual construction of such facilities and zoning changes are beyond the scope of the Project. The special districts also encourage public input into the design of TOD neighborhood plans to reflect unique community identities.

The potential for TOD differs at each station site. Factors that could spur TOD, beyond the addition of a transit station, include available and undeveloped land, adoption of TOD zoning and policies, other real estate investment in the area, and market demand for new and additional floor space. In developed areas, such as Waipahu and Downtown, TOD could occur in the form of redevelopment of existing uses. The presence of underutilized buildings and uses could spur redevelopment.

18 and 19) The direct comparison of carbon dioxide emissions between automobiles and transit rail cannot be made without knowing the energy sources providing the electricity. The utility (HECO) that will provide electricity for the Project primarily uses fuel oil to generate electricity, but the HECO grid is supplemented with independent power producers that generate electricity through renewable resources. As noted in Section 4.9.3 of the Final EIS, the Project will result in a daily reduction of 171 metric tons of carbon dioxide when compared to the No Build Alternative. For an at-capacity system, approximately 25 grams of carbon dioxide are emitted per passenger mile. Approximately 150 grams of carbon dioxide are consumed per 1/50th of a gallon of gasoline consumed.

As noted in Section 4.11.1 of the Final EIS, an average rail vehicle consumes 62,700 British thermal units (BTUs) per vehicle mile of service. A single vehicle

has a capacity of approximately 160 passengers. Therefore approximately 390 BTUs are consumed per passenger mile at capacity. Consumption of 1/50th of a gallon of gasoline consumes 2,500 BTUs.

20) The power for the transit system will be drawn from the electrical grid maintained by HECO. As presented in Section 4.11.3 of the Final EIS, the Project will consume approximately 1 to 2 percent of the total projected electricity generated on Oahu in 2030. The planned electricity-generating capacity on Oahu will be sufficient to support the transit system, but the electricity distribution system will require various upgrades to support the system (HECO 2008). The power demands of the system are such that the voltage and current requirements can only be met by a major utility. HECO is currently soliciting proposals to supply up to 100 megawatts of non-firm renewable-energy-generating capacity to be operational between 2010 and 2014. Currently, HECO's transmission system receives 11 percent of its total generating capacity through renewable resources.

Combining this energy requirement with the reduction in energy due to savings in roadway vehicle miles traveled (VMT), the Project is expected to reduce overall energy requirements by approximately 3 percent. The emissions generated due to the power requirements are expected to reduce the emission savings calculated for roadway VMT changes due to the Project, as shown in Table 4-20 of the Final EIS, but even with the additional emissions due to power generation, the Project is still predicted to reduce overall regional emission burdens.

21) HECO is moving toward renewable energy generation. As that happens, the fixed guideway will also benefit from such new sources of energy. In addition, the integration of photovoltaic cells into stations and other project features could reduce net project electricity demand.

22) The system will consume electricity from all sources in use by HECO. Electricity from HPOWER cannot be segregated from other energy consumption on Oahu.

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

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Elaine Chu
94-526 Alapoai Street * Mililani * Hawaii * 96789

December 10, 2008

Mr. Wayne Yoshioka
Department of Transportation Services
City & County of Honolulu
650 S. King St., 3rd Floor
Honolulu, HI 96813

Dear Mr. Yoshioka:

I would like to add my support to Councilman Djou's plan of building the initial phase of the rail system through the airport, and between the Aloha Tower and Aiea, and add that I would personally like to see the rail built between Aloha Tower and Pearl City.

I'm not a rocket scientist nor a mathematician, but it seems logical to me that relieving the congestion up ahead of traffic and closer into town will result in a trickle "westward" effect for those in West and Central Oahu. "Unclogging" the blockage or dam up ahead would result in:

1) helping to clear the blockage to the flow of the" automobile river" and thereby opening up a clearer and quicker path for those of us in the rear, for no matter how much of a relief in traffic there is at the rear (Kapolei and Waipahu), if there is congestion up front, it will make no difference in travel time for those of us at the rear (please excuse my redundant efforts to make a point).
    a. like an escalator... as you're going up or down an escalator, and if somehow there's a pile-up or stoppage ahead of you, although you may be the only person at the clear end of the line, you'll be heading right into the pile-up ahead of you, and end up in a mess.

A rail route between Aloha Tower and Aiea (or Pearl City) through the airport would also:

1) allow more residents from, not only the Kapolei/Ewa area, but from other Oahu districts to access the rail as a means of transportation

a. residents of West as well as Central Oahu and beyond would be provided an option of being able to drive to a point in Aiea (or Pearl City) and then ride the rail either to the airport or further into downtown for business, school and/or leisure.

b. make it more desirable and accessible for town residents and business people who are frequent commuters to the neighbor islands, and who may welcome the rail with open arms.

c. result in increased rail usage by residents from Pearl City to Halawa, and, combined with the number of possible rail user from Central Oahu, there could subsequently, be a decrease in the number of cars in traffic from Pearl City into downtown

2) make it more desirable for airport area employees and those needing to catch a flight in the morning to ride the rail, as these residents might find the rail more convenient than facing traffic and parking hassles and this, in turn, would alleviate the parking and traffic problems at the airport and potentially take additional cars off the road in the mornings

If one chooses to, or needs to, drive into town, with traffic being alleviated up front, commute time would decrease and gas mileage would increase.

I live in Mililani and have been selfishly wondering how a rail system from Kapolei to Waipahu would benefit my family and other residents in Central Oahu and beyond when traveling to and from town in the morning and afternoon rush hours. Simply put, this route will not be a benefit to any of us. We would still be facing the same traffic mess for years to come.

And, if the initial phase of the rail is built in Kapolei, I doubt very much if it will have an impact on the travel time of residents in that area of the island. Again, if there is a "bottleneck" up front, it doesn't matter if you relieve the traffic in the Kapolei/Ewa area -- the back end of the bottleneck. .In order to get beyond Waipahu, rail riders from Kapolei/Ewa

would probably need to transfer in Waipahu to some form of vehicular transportation and will still add to, and have to deal with, any traffic bottlenecks between Pearl City and town.

Size of available land and immediate cost has been mentioned as the primary reason for overriding logic and efficiency. It is hoped that our elected servants are elected because the people believe in their creative and innovative intelligence and concern for the general well-being of the community as a whole, and realize that taking short cuts for the sake of immediate convenience will eventually cost us more in the long run.

A public official had the will to get this rail system developed on Oahu in spite of opposition, controversy, and concerns re cost, routes, etc. I believe his guiding words were, "If there's a will, there's a way." Why not follow his example and look for ways to improve our traffic and transportation challenges as logically and efficiently as possible.

Mahalo,

Elaine Chu

cc: Councilman Charles Djou
Councilman Donovan DelaCruz

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT10/09-338278

Ms. Elaine Chu
94-526 Alapoai Street
Mililani, Hawaii 96789

Dear Ms. Chu:

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

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

Your comments have all been noted. As described in Section 2.5.10, Project Phasing, and further in Section 8.6.9, Construction Phasing, in the Final EIS, to support phased opening, the first construction phase must be connected to a maintenance and storage facility, which requires considerable space. No location has been identified closer to Downtown with sufficient available space to construct a maintenance and storage facility. Therefore, construction will begin between East Kapolei and Leeward Community College. The Project will be constructed in phases to accomplish the following:

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

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

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

- *Balance expenditure of funds to minimize borrowing.*

The portion of the corridor in the Ewa direction of Pearl Highlands is less developed than the areas in the Koko Head direction. Right-of-way can be obtained more quickly at the west end of the Project; therefore, overall project construction can begin earlier, resulting in lower total construction costs. Construction is planned to continue uninterrupted in the Koko Head direction from Pearl Highlands to Aloha Stadium, Kalihi, and finally to Ala Moana Center. As portions of the Project are completed, each will be opened incrementally so that system benefits, even if limited during the initial phases, will be realized prior to completion of construction of the entire Project.

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

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
Creation Date :	11/18/2008
Creator Affiliation :	
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Telephone :	537-4674
Telephone Extension :	
Add to Mailing List :	Email
Submission Method :	Website
Other Submission Method :	
Submission Date :	11/18/2008
Submission Content/Notes :	Table 4-1 of the EIS (land use) identifies several hundred acres of extg. land that needs to be "converted to transportation use." What is transporation use? Is that a new land use (i.e. zoning) designation? Is the EIS intended to satisfy land use amendmens where the rail route is not within an extg. right-of-way?

DEPARTMENT OF TRANSPORTATION SERVICES

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

May 21, 2010

RT9/09-330550

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

Dear Mr. Chu:

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

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

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

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this

letter. Issuance of the Record of Decision under NEPA and acceptance of the Final EIS by the Governor of the State of Hawaii are the next anticipated actions and will conclude the environmental review process for this Project.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
Creation Date :	12/25/2008
Creator Affiliation :	
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Last Name :	chu
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Telephone :	537-4674
Telephone Extension :	
Add to Mailing List :	Email
Submission Method :	Website
Other Submission Method :	
Submission Date :	12/25/2008
Submission Content/Notes :	As a partially federally funded project, is there a mandatory small business set aside (i.e. SBA 8(a), veteran owned, HUB Zone, DBE, etc.) provision for the design and construction of this project? If so, I request the set aside be for 8(a) service disable veteran owned businesses.

DEPARTMENT OF TRANSPORTATION SERVICES

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT10/09-338269

Mr. Michael Chu
126 Queen Street
Honolulu, Hawaii 96813

Dear Mr. Chu:

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

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

No, the City and County does not have small business set asides. Any additional questions regarding the City's policy can be obtained from the City's Department of Budget and Fiscal Services, Purchasing Division.

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

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

24 November 2008

Mr. Wayne Yoshioka P.E. Director
Department of Transportation Services
650 South King Street 3rd Flr.
Honolulu, H 96813

SUBJECT: Honolulu High Capacity Transit Corridor Project, Draft EIS

Dear Wayne:
Thank you for allowing me to comment on the draft EIS. I look forward to you response to my comments below.

1. The Honolulu Advertiser (11/20/08) reported that limited rail service will become available in 2013 between West Loch and Waipahu. Is this the first construction phase of the project and is this equivalent to construction of the rail system between the West Loch Station and the Waipahu Transit Center as depicted in the draft EIS maps (Fig. 2-6)?
2. Figure 2-5 shows the rail following the North-South Road, then veering east across the proposed Hoopili project area, makai of Farrington Highway. However if you visit the DR Horton/ Hoopili web site they show the rail going all the way up to Farrington and then turning east following the Farrington alignment. Which is correct?
3. Table 4-1 (land use) states that 145 to 165 acres of existing land uses need to be converted to "transportation use." What is transportation use? Is this a new land use category, a new zoning designation?
4. Little is discussed in the draft with regards to the park and ride facilities. What kind of parking capacity will they have? Will they be at grade lots or multi-level structures? Will any special design guidelines be create for them or will only the existing LUO standards be used? Will fees be charged for parking? How much?
5. I understand that the rail superstructure will be approximately 30 ft. in height. Is this to the top or bottom of the superstructure?

Yours Truly

Michael S. Chu
126 Queen Street Suite 306
Honolulu, HI 96813
mchu-lpd@hawaii.rr.com

RECEIVED
2008 NOV 26 P 2:40
DIRECTOR'S OFFICE
DEPARTMENT OF TRANSPORTATION SERVICES

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DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT11/08-289033R

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

Dear Mr. Chu:

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

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

To address your first two comments, the first construction phase of the Project is expected to open in 2012 between West Loch and Pearl Highlands. Figure 2-42 of the Draft EIS illustrates the construction phases. The alignment that was shown in the Draft EIS is correct. Likewise, differences in the alignment shown on the DR Horton website for the Hoopili development project area may exist; however, the alignment through the Hoopili project area shown in the Draft EIS is correct.

Next, "transportation use" is not a new land use category or a zoning designation. It is the transfer through sale of private or public property to the public transportation agency who then owns the land. Land that is converted to "transportation use" is not available for private use – commercial, industrial, or residential.

Your fourth comment concerns park-and-ride facilities. Chapter 2, Section 2.5.7 of the Final EIS, discusses park-and-ride facilities. The size and capacity of park-and-ride facilities are presented in Table 2-8. A total of 4,100 park-and-ride spaces are planned and distributed over four locations. As stated in Section 2.5.7, with the exception of Pearl Highlands, which will be a parking structure, all park-and-ride lots are expected to be constructed as surface parking. Criteria will be developed that will guide design of Project elements, including park-and-ride facilities. As indicated by Chapter 6 of the Final EIS (Section 6.3.2), potential operating and maintenance funding sources do not include revenues from Project park-and-ride facilities. There are currently no plans to charge for parking at park-and-rides.

Lastly, Appendix B of the Final EIS provides a profile (the height above ground) for the track for the entire system. For much of the system, the track height is approximately 30 feet above ground. The superstructure will be approximately 10 feet thick.

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

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
Creation Date :	1/5/2009
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Other Submission Method :	
Submission Date :	01/05/2009
Submission Content/Notes :	The light rail system should be built first from Waipapu to Ala Park area. The reason is to relieve the present unbearable traffic bottleneck in the Middle Street portion of H1.This is the main reason for the rail system for the City of Honolulu. After we built this portion of the rail system,then we should plan for an underground system for downtown Honolulu. Build a right rail system we can all proud of! Not an ugly elevated overhead system through downtown Honolulu and Waikiki. Perhaps President Obama will help his native land to fund this rail project.

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, 3RD FLOOR
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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT10/09-337210

Mr. Tit Kwong Chun
2646B Haili Road
Honolulu, Hawaii 96813

Dear Mr. Chun:

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

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

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

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

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

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

- *Balance expenditure of funds to minimize borrowing.*

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

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

Regarding your request for an underground system, due to cost and geotechnical constraints, an underground transit system is not a feasible option.

The Project has logical termini at East Kapolei and Ala Moana Center and independent utility from any extensions that may be constructed in the future. The future extensions to West Kapolei, Salt Lake Boulevard, Waikiki, and UH Manoa are discussed in the cumulative impacts sections of Chapters 3 and 4 of the Final EIS. However, the future extensions are not part of this Project; thus, they are not required to be evaluated under Chapter 343 of the Hawaii Revised Statutes and NEPA. Under NEPA, environmental analysis is only required when there is a proposed action by a Federal agency. Here, because the future extensions are not proposed for implementation at this time, they are not part of the Project studied in the Final EIS. It would be premature to undertake an environmental analysis of the extensions (beyond the cumulative impacts analysis) because they are not part of the proposed action to be taken by the City and FTA. If the future extensions are proposed for implementation in the future, environmental analysis of the extensions and appropriate alternatives will be undertaken at that time. Other extensions, such as Central Oahu, have been considered and may be undertaken at some point after the current Project is completed.

The island's unique visual character and scenic beauty was considered in the visual and aesthetic analysis presented in the Draft and Final EISs. As discussed in Section 4.8 of the Final EIS, the Project will be set in an urban context where visual change is expected and differences in scales of structures are typical. The following measures will be included with the Project to minimize negative visual effects and enhance the visual and aesthetic opportunities that it creates:

- *Develop and apply design guidelines that will establish a consistent design framework for the Project with consideration of local context.*

- *Coordinate the project design with the City's transit oriented development program within the Department of Planning and Permitting.*

- *Consult with the communities surrounding each station for input on station design elements.*

- *Consider specific sites for landscaping and trees during the final design phase when plans for new plantings will be prepared by a landscape architect. Landscape and streetscape improvements will serve to mitigate potential visual impacts.*

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

Lastly, as described in Chapter 6 of the Final EIS, Federal funding is proposed to fund a portion of the Project's capital costs.

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

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Record Date :	12/6/2008
First Name :	wayne
Last Name :	chun
Business/Organization :	
Address :	
Apt./Suite No. :	
City :	
State :	HI
Zip Code :	96701
Email :	chunw007@hawaii.rr.com
Telephone :	
Telephone Extension :	
Add to Mailing List :	Email
Submission Method :	Website
Submission Content/Notes :	Dear Sirs,

I was not a supporter of the HNL Rail Transit, I will yield to the results of the recent general election. In light of our State's overall economy, I feel construction of the HNL Rail Transit will create the critical surge the construction of the HNL Rail Transit will do to stimulate our State's sluggish economy during this national economic downturn.

It is my opinion that we initiate the construction of the HNL Rail Transit from Oahu's economic hub, downtown Honolulu. This will provide the taxpayers of Oahu the most immediate ridership between downtown to PearlCity and vice versa. This route will have the most immediate financial re-payment. Secondarily, the airport route can be easily implemented into this initiate route.

Starting from West Oahu, the ridership impact into downtown Honolulu will not materialize for an additional 3 - 4 years due to the distance from downtown Honolulu and the overall cost will be much higher in comparison to the downtown Pearl City route.

For the above reasons, I favor Councilman Charles Dijou's concept.

Sincerely,
Wayne G.K. Chun

RECORD # 128 DETAILS

Status :	Initial Action Needed
Creation Date :	12/6/2008
Creator Affiliation :	
First Name :	wayne
Last Name :	chun
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City :	
State :	HI
Zip Code :	96701
Email :	chunw007@hawaii.rr.com
Telephone :	
Telephone Extension :	
Add to Mailing List :	Email
Submission Method :	Website
Other Submission Method :	
Submission Date :	12/06/2008
Submission Content/Notes :	Dear Sirs,

I was not a supporter of the HNL Rail Transit, I will yield to the results of the recent general election. In light of our State's overall economy, I feel construction of the HNL Rail Transit will create the critical surge the construction of the HNL Rail Transit will do to stimulate our State's sluggish economy during this national economic downturn.

It is my opinion that we initiate the construction of the HNL Rail Transit from Oahu's economic hub, downtown Honolulu. This will provide the taxpayers of Oahu the most immediate ridership between downtown to PearlCity and vice versa. This route will have the most immediate financial re-payment. Secondarily, the airport route can be easily implemented into this initiate route.

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For the above reasons, I favor Councilman Charles Dijou's concept.

Sincerely,
Wayne G.K. Chun

Reply Requested :	Yes
Submission Type :	Draft EIS Comment
FOIA (Freedom of Information Request) Request :	
FOIA Referral Date :	
FOIA Response Date :	

DEPARTMENT OF TRANSPORTATION SERVICES

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-331297

Mr. Wayne Chun
chunw007@hawaii.rr.com

Dear Mr. Chun:

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

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

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

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

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

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

- *Balance expenditure of funds to minimize borrowing.*

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

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

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

Please review Section 2.5.8 of the Final EIS regarding the maintenance and storage facility. The two potential locations (one near the Hoopili station and the other near Leeward Community College) for the maintenance and storage facility are detailed in Figures 2-38 and 2-39. Either of these sites will require less relocation and will have fewer property impacts then a maintenance facility in a developed urban area such as Downtown Honolulu. Construction methodologies in these less-developed areas can be refined more easily to reduce impacts to the natural and built environments.

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

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Status :	Initial Action Needed
Creation Date :	1/2/2009
Creator Affiliation :	
First Name :	Guillermo
Last Name :	Colon
Business/Organization :	
Address :	95-123 Hamumu Pl.
Alternative Preference :	
Apt./Suite No. :	
City :	Mililani
State :	HI
Zip Code :	96789
Email :	colong001@hawaii.rr.com
Telephone :	554-8637
Telephone Extension :	
Add to Mailing List :	Both
Submission Method :	Website
Other Submission Method :	
Submission Date :	01/02/2009
Submission Content/Notes :	I have the following suggestions. 1. Maintenance Facility location, looking over the DEIS the LCC site would look like a better site than the Hoopili when you consider construction costs due to you will not need bring elevated guideway down to grade level. Also this site has a more central location, the Hoopili site however has more land area, would be less of an impact on surrounding areas and closer to the Kahe Power Plant. Which could be a benefit if there was a power outage. This site would provide less impact to surrounding area due to its rural location. 2. Bicycles, I see mention of parking areas for bikes at stations however will bikes be allowed on the rail cars? Allowing them on the rail cars will allow greater mobility options for the users of the rail system. 3. On the Airport route will passengers be allowed to bring on baggage, and if they are allowed how will this be addressed when transferring onto the bus? 4. I see that there will be numerous Traction Power Substations along the rail route will there be any Hazmat issues with the transformers in these substation? 5. Concerning the Traction Power Substations will there be security at the stations. Some will be located in secure area however some will be in isolated areas surrounded only by chain link fencing.

DEPARTMENT OF TRANSPORTATION SERVICES

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

May 21, 2010

RT9/09-332350

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

Dear Mr. Colon:

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

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

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

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

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

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

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
Creation Date :	1/5/2009
Creator Affiliation :	
First Name :	Terrence
Last Name :	Conlan
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City :	Honolulu
State :	HI
Zip Code :	96822
Email :	terryconlan@aol.com
Telephone :	808-561-5171
Telephone Extension :	
Add to Mailing List :	Email
Submission Method :	Website
Other Submission Method :	
Submission Date :	01/05/2009

Submission Content/Notes : Dear Sirs,

I'm writing to share my thoughts regarding the draft Environmental Impact Study (EIS).

I will not address the Air Port vs. Salt Lake route alignment here, as I believe that is still being decided by the City Council. I will share my thoughts on that with them.

1. The Goals and Objectives of this project are not adequately defined and documented in this report. Many of the issues coming up could be addressed and resolved much quicker and better if everyone had a better idea of what we were trying to accomplish. (Planning and defining are (or should be) half the work). Are we trying to get people out of their cars? Reduce freeway traffic congestion? Commute traffic? Get people around town faster? Improve our tourist industry? Reduce carbon emissions? Replace The Bus with a rail line? What? The Objectives should dictate the design and route and stations.
2. The project does not contain adequate detailed measurable criteria for judging and evaluation the ultimate success or failure of the project. Are the total cost and the reduction of the number of cars on the freeways in the corridor the only measures we are going to use? By the way, your projections of future freeway traffic are incorrect. There will not be such a large increase in this traffic because when they get there; there will be no place to park! Forecast the parking situation and costs and I think you will agree.
3. Doesn't it make more scenes to start where we can get the biggest and earliest "bang for our buck"? If we start it in the empty fields of Kapolei and run it to Waipahu, the rider ship will be very low for a long time. We will have high construction costs and operating costs and little revenue or effect on our Goals (Don't forget we will have to start paying for it whether we have construction delays or not!). If we ran it from the Stadium to town (with a good Park and Ride at the Stadium (traffic from H1, H2 and H3 could park here and ride in), the rider ship and revenue would be high and the Goals would be impacted much sooner. Phase 2 should be from town to Waikiki and UH for the same reasons.
4. Why is the route not using the (existing and government owned) Oahu Railroad right of way? This would cause much less disruption, be cheaper and faster to build because of less land acquisitions and provide a shorter, faster, cheaper rout.
5. Why is the alignment using Fort Barrette Road instead of Renton Road or Kapolei Parkway? Either of these would be shorter, faster, cheaper and be less disruptive during construction. (Remember, no matter where we put it most people are going to have to ride The Bus or drive their cars to get to the rail Station. So, we don't have to have the rail go by everyone's front door.)
6. There are not enough Park and Rides in the system (except for Kapolei, which may have too many). Remember, people are not going to give up their cars completely and most people will have to take The Bus or their cars to get to the rail station. Also, the Park and Rides need to adequately address Moped and bike use and provide for adequate safety and security for people and property.
7. This document does not adequately address and document the

interface and integration of the rail and The Bus. To be successful, The Bus must provide an effective collection and disbursal system for each station. This document also does not address the means by which this coordination at higher administrative levels will occur.
8. Does the system have too many stations? Each station requires the train to slow down and speed up as well as sit for a period in the station. The number of stops significantly affects the speed of travel. If we have too many stations close to town and Waikiki we may shift bus riders to the rail and overload the rail and reduce the effectiveness of The Bus and not get any more cars off the road. We need to think of the Rail as a Wholesale operation (fast movement of large groups of people over long distances. And, rely on The Bus for Retail "short hops". To get people to give up their cars, the alternative must be noticeably faster and cheaper and at least close to as clean, comfortable and safe.
9. I don't see anything in this EIS about dealing with luggage for riders going to or coming from the airport. No use using an Airport alignment if riders can't take their luggage. Oops there go all the tourists and a lot of locals. (And tourists rent and then drive a lot of cars!
10. Because this is being referred to as Rail, will it fall under the Federal agencies that regulate Railroads? Will the workers be able to join the national railroad unions and their pay, benefits and working conditions negotiated at a National level?
11. We can take our bikes on The Bus. Will we be able to take our bikes on Rail?
12. When we built the Stadium, we did not take into account the salt air and humid conditions here, which have resulted in continuing high maintenance costs. What are you doing to insure that we don't experience the same result with the Rail system (and Stations)?

Sincerely
Terrence Conlan
1535 Punahou St 704
Honolulu, HI 96822
808-561-5171
terryconlan@aol.com

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-332447

Mr. Terrence Conlan
1535 Punahou Street
Apartment 704
Honolulu, Hawaii 96822

Dear Mr. Conlan:

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

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

Your comments have been noted. This letter responds to testimony points. Per your first point concerning the goals and objectives for the Project, these goals and objectives are listed in Table 1-4 and described in Section 1.8 of the Draft EIS. The project goals are to improve corridor mobility, corridor travel reliability, access to planned development to support City policy to develop a second urban center, and transportation equity.

To answer your second point, Chapter 7 of the Draft EIS lists the measures that were used to evaluate the Fixed Guideway Transit Alternatives. Evaluation was based on the local goals for the Project (as described in Chapter 1 of the Draft EIS) as well as FTA criteria for evaluating projects proposed for funding under the Section 5309 New Starts Program. Table 7-1 in the Draft EIS lists the evaluation measures that were used based on the proposed action goals and objectives. Evaluation measures included transit ridership, travel time, benefits to transit-dependent communities, and development within station areas compared to the existing

amount of development. In addition, environmental effects, cost-effectiveness, and financial feasibility were also evaluated.

Ridership projections for the forecast year of 2030 have been developed using the travel demand model used by the Oahu Metropolitan Planning Organization (OahuMPO) for the Oahu Regional Transportation Plan (ORTP), which was calibrated against collected traffic and transit ridership information and then validated against current counts to be sure it properly represents travel activity in the transportation system (Section 3.2.1 of the Final EIS). An on-board transit survey was completed in December 2005 and January 2006, and the latest socioeconomic information available as of October 2008 was incorporated. Traffic counts were collected in 2005, 2007, and 2008. The model is based upon a set of realistic input assumptions regarding land use and demographic changes between now and 2030 and expected transportation levels of service on both the highway and public transit system. OahuMPO undergoes model updates every five years to reflect land use and transportation network changes. The model is approved by the OahuMPO Technical Advisory Committee. Based upon the model and these key input assumptions, approximately 116,000 trips per day are expected to use rapid transit system on an average weekday in 2030. Since the Draft EIS, the travel demand model has been refined by adding an updated air passenger model (which forecasts travel in the corridor related to passengers arriving or departing at Honolulu International Airport), defining more realistic drive access modes to project stations and recognizing a more robust off-peak non-home-based direct demand element (trips that do not originate at home) based on travel surveys in Honolulu.

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

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

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

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

As described in Chapter 2 of the Final EIS, several alignments were evaluated during the Alternatives Analysis process. One evaluated alignment was the historic OR&L line you mention in your fourth point. A combination of issues, including utilities that have been placed in the right-of-way, poor location in several places, and the previous loss of the right-of-way in several locations all contributed to the elimination of that option. The Project is fully grade-separated to eliminate potential conflicts with traffic and eliminate the effects of congestion and incidents on the system. Placing any part of the system in mixed right-of-way would affect reliability of the entire system.

Your fifth point regarding using Fort Barrette Road instead of Renton Road is beyond the Waianae end of the Project. When the planned extensions are evaluated in the future, a range of alternatives will be evaluated for each of them. Renton Road, Fort Barrette Road, and Kapolei Parkway are likely alignments to be considered when the Kapolei extension is evaluated, once funding is identified.

Your concerns about park-and-ride locations in the sixth point are noted. While there are more than 4,100 spaces identified as part of the Project, the experience with park-and-ride facilities in Honolulu to date is limited. They have been generally underused. The lots contained in the Project are located toward the Ewa end of the route and are based on consideration of parking demand using the travel demand forecasting model for the year 2030. Further, the projected mode of access shares were compared to observed data from several Mainland areas, notably San Diego. Given the history of park-and-ride use on the island, it seems prudent to evaluate any need for additional or larger facilities based on empirical experience rather than commit substantial additional funding now. Any need for additional parking at the four stations with park-and-ride facilities would best be determined once experience is gained about their use. Bicycle racks will be provided at every fixed guideway station. Park-and-ride facilities will accommodate moped and motorcycle parking. Security will be provided in the form of surveillance cameras, lighting, fencing, barriers, on-site personnel, or other means.

Regarding the seventh and eighth points, TheBus system will be altered to provide improved connections with the rail system. Bus routes or portions of bus routes will be altered or eliminated to reduce duplication of services with the rail system. Certain local bus routes will be rerouted to provide frequent and reliable connections to the nearest rail station. Because of the high frequency of rail service (every three minutes during peak periods and every ten minutes during off-peak periods), riders transferring from buses to trains will experience minimal wait times. Riders transferring from trains to buses will benefit from improved frequencies on existing bus routes serving stations. In addition, several new bus routes with high frequencies will be provided as feeders to the rail system. Since these routes will primarily operate in residential areas, they will provide greater reliability versus routes operating along congested arterials. Additional information regarding existing and future bus routes, including frequency, is included in Appendix D of the Final EIS.

The number of stations affects riders in two ways. If stations are too far apart, the system is not convenient as users must walk or drive too long of a distance to access a station. If they are too near, the average travel speed is reduced. To balance these concerns, the

average distance between stations is approximately one mile, with shorter distances in denser areas that have greater transit demand.

With completion of the fixed guideway, rail and bus service will each be administered by the City and County of Honolulu. This consolidated administration and management will facilitate the coordination in the planning, operations, and other aspects of an integrated transit system in Oahu.

Per the ninth and eleventh points, the luggage policy for the system is not final, but the concept of the policy will be to allow luggage that does not interfere with the safety or comfort of other passengers. In addition, bicycles will be allowed on the system and regulated by a bicycle policy to be developed in the future.

Regarding the tenth bullet, this Project falls under the FTA, not the Federal Railroad Administration. The Project is regulated by FTA policy. Employees will either work for the transit authority or a private operator that is contracted with the agency.

Lastly, corrosion-control measures will be applied to the Project's fixed steel facilities and neighboring utility structures to provide proper operation over their lifetime. These measures will include the following:

- *Protective coating specification for steel aerial structures*
- *Coating specification for stations*
- *Preventive measures against stray current corrosion*
- *Corrosion-control design of transit underground utilities and neighboring utilities owned by others*

Project operating and maintenance costs detailed in Section 6.4 of the Final EIS also include preventive maintenance of the rail system and stations.

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

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Jack R. Corteway
1525 Wilder Avenue, Apt. #504
Honolulu, Hawaii 96822

December 5, 2008

Department of Transportation Services
650 South King Street
3rd Floor
Honolulu, Hawaii 96813

Dear Department of Transportation:

In my judgment, it makes more sense if the first leg starts downtown and goes to Salt Lake and then Pearl City to secure significant ridership. If you begin at Kapolei and just go to Pearl City, I can't imagine many people riding.

Aloha,

Jack Corteway

RECEIVED
08 DEC 9 P12:34
DIRECTOR'S OFFICE
CITY & COUNTY OF HONOLULU
TRANSPORTATION SERVICES

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT12/08-290819R

Mr. Jack R. Corteway
1525 Wilder Avenue
Apartment 504
Honolulu, Hawaii 96822

Dear Mr. Corteway:

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

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

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

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

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

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

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

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

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
Creation Date :	1/15/2009
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Telephone Extension :	
Add to Mailing List :	Both
Submission Method :	Website
Other Submission Method :	
Submission Date :	01/15/2009
Submission Content/Notes :	Have you considered the effects of global warming and the rising of the sea levels in the next 50 years? If the sea level rises approx. 20 feet (6 meters), then many of the areas where the transit area will be running will be under water. See this weblink to the Hawaii Mapping Research Group working with the UH School of Ocean and Earth Science and Technology (SOEST) : http://www.soest.hawaii.edu/hmrg/FloodingOahu/stepbystep_oahu.php

DEPARTMENT OF TRANSPORTATION SERVICES

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-333918

Ms. Melissa Crisostomo
95-1011 Liho Street
Mililani, Hawaii 96789

Dear Ms. Crisostomo:

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

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

Regarding your comment, the Environmental Protection Agency has provided information that global sea level is projected to increase by between 7 inches and 23 inches. The minimum elevation for any project feature is five feet above sea level; therefore, a rise of up to two feet would not directly affect any project feature.

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

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
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Telephone Extension :	
Add to Mailing List :	Email
Submission Method :	Website
Other Submission Method :	
Submission Date :	12/06/2008
Submission Content/Notes :	Please advise asap background info on the background of 5 transportation expert panel who supplied with steel-on-steel recommendation. Who are they? what were their credentials and why were they qualifed to make a recommendation. I can't seem to find this anywhere. Mahalo

DEPARTMENT OF TRANSPORTATION SERVICES

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-331302

Ms. Liz Crowder
44-096 Keaalau Place
Kaneohe, Hawaii 96744

Dear Ms. Crowder:

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

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

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

Proprietary technologies, meaning those technologies that would have required all future purchases of vehicles or equipment to be from a single manufacturer, were eliminated because

none of the proprietary technologies offered substantial proven performance, cost, and reliability benefits compared to steel wheel operating on steel rail.

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

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

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
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Telephone Extension :	
Add to Mailing List :	Both
Submission Method :	Website
Other Submission Method :	
Submission Date :	02/05/2009

Submission Content/Notes : February 5, 2009
Draft EIS on Honolulu Rail Transit
Commentary

Pardon me, but I have not seen enough "concrete," factual information provided to support building and maintaining an elevated rail transit system in Honolulu. Talk and promises are cheap, and the reality of this project would be devastating, not only aesthetically but financially, for us now and for our keiki's generations to come.
Even after reading the Draft EIS, too many questions remain unanswered; why is elevated rail necessary, where will the money come from, and where is the logic in touting our "second city" if we need to spend so many billions of dollars to get there? Rail would "provide accessibility to new development in the 'Ewa-Kapolei-Makakilo area in support of the City's policy to develop this as a 'second city,' ..."
Even the projected billions in costs is only a minimum estimate, the reality of the costs will be much higher.
As it is, our own Council on Revenues is lowering its projections every week, so how can we even venture to go ahead with this massive project with no end in sight of looming shortfalls?
Who leads these municipal projects, self-serving politicians and the construction industry? Until our leaders prove to us they are capable of maintaining their existing responsibilities and ongoing projects in our Honolulu and upgrade our infrastructure, we have no business committing money we do not have to start another ill-fated, short-term gain (construction jobs), long-term loss project.
Construction of elevated rail for Honolulu is insane for obvious reasons, at-grade light rail (LRT) is a compromise at best. I understand that AIA Honolulu has prepared a compelling, must-read, factual report supporting LRT, presenting glaring, substantial differences between the two systems in overall construction costs and time, operation and maintenance costs, visual, environmental and traffic impact, and comparable references to current systems in North America.
I am more inclined to trust the assessment of those who spend their own money and whose livelihoods depend on sound planning and critical thinking rather than the assessment of those who spend taxpayers money and whose livelihoods continue on whether their decisions are sound or not.
We must unite in enlightenment! Don't fall for this. Educate yourselves, think standing up, read the facts, do the math, and do not be afraid to challenge "those who go along unquestioningly with popular opinion, with potentially dangerous or fatal consequences."

MJ Culvyhouse
Kaneohe
247-5547eves
586-9293days

DEPARTMENT OF TRANSPORTATION SERVICES

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-334454

Ms. MJ Culvyhouse
46-318 Haiku Road, #55
Kaneohe, Hawaii 96744

Dear Ms. Culvyhouse:

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

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

The Alternatives Screening Memorandum (DTS 2006a) recognized the visually sensitive areas in Kakaako and Downtown Honolulu, including the Chinatown, Hawaii Capital, and Thomas Square/Honolulu Academy of Arts Special District. To minimize impacts on historic resources, visual aesthetics, and surface traffic, the screening process considered 15 combinations of tunnel, at-grade, or elevated alignments between Iwilei and Ward Avenue. Five different alignments through Downtown Honolulu were advanced for further analysis in the Alternatives Analysis, including an at-grade portion along Hotel Street, a tunnel under King Street, and elevated guideways along Nimitz Highway and Queen Street (Figure 2-4).

The Alternatives Analysis Report (DTS 2006b) evaluated the alignment alternatives based on transportation and overall benefits, environmental and social impacts, and cost considerations. The report found that an at-grade alignment along Hotel Street would require

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

The Project's purpose is "to provide high-capacity rapid transit" in the congested east-west travel corridor (see Section 1.7 of the Final EIS). The need for the Project includes improving corridor transit mobility and reliability. The at-grade alignment would not meet the Project's Purpose and Need because it could not satisfy the mobility and reliability objectives of the Project (see bullets below). Some of the technical considerations associated with an at-grade versus elevated alignment through Downtown Honolulu include the following:

- ***System Capacity, Speed, and Reliability***—*The short, 200-foot (or less) blocks in Downtown Honolulu would permanently limit the system to two-car trains to prevent stopped trains from blocking vehicular traffic on cross-streets. Under ideal operational circumstances, the capacity of an at-grade system could reach 4,000 passengers per hour per direction, assuming optimistic five minute headways. Based on travel forecasts, the Project should support approximately 8,000 passengers in the peak hour by 2030. Moreover, the Project can be readily expanded to carry over 25,000 in each direction by reducing the interval between trains (headway) to 90 seconds during the peak period. To reach a comparable system capacity, speed, and reliability, an at-grade alignment would require a fenced, segregated right-of-way that would eliminate all obstacles to the train's passage, such as vehicular, pedestrian, or bicycle crossings. Even with transit signal priority, the at-grade speeds would be slower and less reliable than an elevated guideway. An at-grade system would travel at slower speeds due to the shorter blocks, tight and short radius curves in places within the constrained and congested Downtown street network, the need to obey traffic regulations (e.g., traffic signals), and potential conflicts with other at-grade activity, including cars, bicyclists, and pedestrians. These effects mean longer travel times and far less reliability than a fully grade-separated system. None of these factors affects an elevated rail system. The elevated rail can travel at its own speed any time of the day regardless of weather, traffic, or the need to let cross traffic proceed at intersections.*

- ***Mixed-Traffic Conflicts***— *The Project will run at three minute headways. However, three-minute headways with an at-grade system would prevent effective coordination of traffic signals in the delicately balanced signal network in downtown Honolulu. A disruption of traffic signal cycle coordination every three minutes would severely affect traffic flow and capacity of cross-streets. Furthermore, there would be no option to increase the capacity of the at-grade rail system by reducing the headway to 90 seconds, which would only exacerbate the signalization problem. An at-grade system would require removal of two or more existing traffic lanes on affected streets. This effect is significant and would exacerbate congestion. Congestion would not be isolated to the streets that cross the at-grade alignment but, instead, would spread throughout Downtown.*

The Final EIS shows that the Project's impact on traffic will be isolated and minimal with the elevated rail, and, in fact will reduce system-wide traffic delay by 18 percent compared to the No Build Alternative (Table 3-14 in the Final EIS). The elevated guideway will require no removal of existing through travel lanes, while providing a reliable travel alternative. When traffic slows, or even stops due to congestion or incidents, the elevated rail transit will continue to operate without delay or interruption.

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

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

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

Section 6.3 of the Final EIS describes the funding sources to be used to pay for the capital cost of the Project and the City's overall public transportation system. Capital costs of the Project, including finance charges, are expected to be fully paid for by a combination of FTA Section 5307 and FTA Section 5309 New Starts Funds from the Federal government and revenues from the County General Excise and Use Tax surcharge revenues collected from 2007 through 2022 on Oahu. The downturn in the economy has been taken into account. Section 6.4 of the Final EIS describes the funding sources to pay for ongoing operating and maintenance costs associated with maintaining the resulting transit system in a state of good repair. Operating and maintenance costs will be paid for from the same sources currently used for TheBus: Federal funding, fare revenues, and subsidies from the City's General and Highway Funds. Also, Section 6.6 of the Final EIS describes risks and uncertainties associated with these funding assumptions.

As far as discussion regarding Kapolei being the "second city," as identified in Section 1.8.3 of the Final EIS, Kapolei is identified through the City and County of Honolulu General Plan as the second city. Consistent with the Honolulu General Plan, the highest population growth rates for the island are projected in the Ewa Development Plan area (comprised of the Ewa, Ewa Beach, Kapolei, Kalaeloa, Honokai Hale, and Makakilo areas), which is expected to grow by approximately 150 percent between 2000 and 2030. This growth represents nearly 50 percent of the total growth projected for the entire island. Kapolei, which is developing as a "second city" to Downtown, is projected to grow by more than 350 percent, to 55,500 people; the Ewa district by more than 100 percent; and Makakilo by nearly 125 percent between 2000 and 2030.

As stated previously, Section 6.6 discusses the risks and uncertainties associated with these funding assumptions.

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

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

The panel accepted public comment twice as part of its review. By a four-to-one vote, the panel chose a steel wheel vehicle operating on steel rail system because it was considered safe, reliable, economical, and non-proprietary. Those results are documented in the panel's

report to the City Council dated February 22, 2008 entitled "Independent Technology Selection Panel Report".

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

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
Creation Date :	12/29/2008
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Submission Method :	Website
Other Submission Method :	
Submission Date :	12/29/2008
Submission Content/Notes :	Airport route will provide cost savings to locals and tourists alike. This will MAKE money for the state if TOURISM is more accessable. San Diego does not provide airport route...bad for visitors and locals. ONLY THE TAXI COMPANIES PROFIT!! Look at your priorities. Cities like San Francisco, Chicago, London, Paris, Stockholm, etc...have TOURISM and local convience as their top priority!! Mahalo...Jonathon Custer

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

May 21, 2010

RT9/09-332335

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

Dear Mr. Custer:

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

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

Your preference for the Airport Alternative has been noted. While each of the alternatives includes trade-offs between benefits and impacts, the Airport Alternative from East Kapolei to Ala Moana Center has been selected as the Preferred Alternative. The identification of the Airport Alternative as the Preferred Alternative was made by the City to comply with FTA's NEPA regulations that state that the Final EIS should focus on the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative, public input on the Draft EIS, and City Council Resolution 08-261 identifying the Airport Alternative as the Project. The selection of the Airport Alternative is described in Chapter 2 of this Final EIS. The discussion of the alternatives considered is included in Chapter 2 of this Final EIS and the Alternatives Analysis. As discussed in Section 3.4.2 of this Final EIS, the Airport Alternative will carry the most passengers with 116,000 daily passengers

and 282,500 daily trips in 2030, thereby resulting in the greatest transit-user benefits. The Airport Alternative will also result in the fewest vehicle miles traveled and vehicle hours of delay, as well as provide access to major employment areas, including Honolulu International Airport, that will have substantially greater ridership than the other alternatives considered.

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

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

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SCHULER DIVISION

January 19, 2009

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

Dear Mr. Yoshioka:

Subject: Comments on the Draft Environmental Impact Statement (DEIS) for the Honolulu High Capacity Transit Corridor Project

Thank you for allowing us the opportunity to provide comments on the subject DEIS. As you are aware, we are the developers of the master planned Ho'opili project in East Kapolei, and have been and will continue to be a strong supporter of this project. The transportation infrastructure is reaching its limits in being able to move people efficiently through the West Oahu to East Honolulu corridor. The proposed project will increase the infrastructure capacity in the long-term and provide transportation alternatives to residents along this corridor. It will also be able to support the planned growth in the West Oahu region.

We have reviewed the document and provide the following comments.

Chapter 2, Alternatives Considered:

Page 2-14—the section dealing with Transit Centers stated that Transit centers would be constructed as stand-alone facilities or as part of park and ride lots at:

UH West Oahu
West Loch
Pearl Highlands
Aloha Stadium

The following is a listing of each of the stations, the stations types and if a park and ride or transit center is being proposed at the station.

Station	Station Type	Park and Ride	Transit Center
East Kapolei Station	Elevated Platform and Connecting Bridge	12 Acres for 900 Spaces	No
University of Hawaii, West Oahu	Elevated Platform and Concourse	(2)-5 Acre Sites for 500 Spaces each (Total 1,000 Spaces)	Yes (Page 2-14, but not identified on Figure 2-15)
Ho'opili Station	Elevated Platform	No	No
West Loch Station	Elevated Platform and	No	Yes (Page 2-14)

	Concourse		
Waipahu Transit Center Station	Elevated Platform and Concourse	No	Not mentioned on Page 2-14, Mentioned in Figure 2-18 but not located on map
Leeward Community College Station	Platform	No	No
Pearl Highlands Station	Elevated Platform and Connecting Bridge	11 Acres for 1,600 Spaces	Yes (Page 2-14, but not identified on Figure 2-20)
Pearlridge Station	Elevated Platform and Concourse	No	No
Aloha Stadium Station	Elevated Platform and Concourse	7 Acres for 700 Spaces	Yes (Page 2-14, but not identified on Figure 2-22)
Ala Liliko'I Station	Elevated Platform and Concourse	No	No
Aloha Stadium Station	Elevated Platform and Concourse	7 Acres for 700 Spaces	Yes (Page 2-14, but not identified on Figure 2-24)
Arizona Memorial Station	Elevated Platform and Concourse	No	No
Pearl Harbor Naval Base Station	Elevated Platform and Concourse	No	No
Honolulu International Airport Station	Elevated Platform and Concourse	No	No
Lagoon Drive Station	Elevated Platform	No	No
Middle Street Transit Center Station	Elevated Platform and Concourse	No	Not mentioned on Page 2-14, Mentioned in Figure 2-29 but not located on map
Kalihi Station	Elevated Platform	No	No
Kapalama Station	Elevated Platform	No	No
Iwilei Station	Elevated Platform	No	No
Chinatown Station	Elevated Platform and Concourse	No	No
Downtown Station	Elevated Platform and Concourse	No	No
Civic Center Station	Elevated Platform	No	No
Kakaako Station	Elevated Platform	No	No
Ala Moana Station	Elevated Platform	No	No

From the information provided:

1. Is the City limited to the specific type of station listed in this chapter or could any one of the three proposed configurations be used (i.e. Side platforms without mezzanine, Side platforms with mezzanine, or Center platform with mezzanine)?

2. Does mezzanine mean concourse as is used in identifying the specific stations in the figures?

3. Is there some criteria for the proposed "Transit Centers" and some idea of the area (acres) required for each of these centers?

4. There seems to be more Transit Centers being proposed than what is listed on page 2-14.

On page 2-24, the key components of each transit station are described in a "sidebar." We note that there is no mention of public restrooms (even automated public toilets) or what form of security will be provided (including security cameras).

Page 2-36 Park and Ride Lots—are the park and ride lots limited to the locations identified in the DEIS or is there some flexibility to house the required number of spaces in and around the transit stations by incorporating more parking into redevelopment or development adjacent to the station. For example, if an entertainment facility were being built near the station, the parking for the entertainment center could be shared and used for the park and ride since the need for parking for the transit should be at different times when the parking would be needed for the entertainment facilities. Allowing these types of joint uses and incorporating the park and ride needs into the development would seem to be mutually beneficial to both the City and the developers.

Pages 2-37 and 2-38 Vehicle Maintenance and Storage Facility—This section identifies a 41 acre area adjacent to the existing HECO Substation at Ho'opili and another 43 acre site near the Leeward Community College (Navy Drum Site) as possible sites for the maintenance facility.

This 41 acre site is also indentified on the Conceptual Alignment Plans and Profiles (Drawing No.: RP004a). However, on the Conceptual Right-of-Way Plans (Drawing No.: RW006a) the proposed Maintenance and Storage Facility is identified as a 12 acre site. Please clarify the actual land requirements for this facility.

Also, while the statement in the document is correct that the site is currently in agricultural use, the existing lessee, Aloun Farms, has a lease from us for its entire processing and office facilities located within the footprint of the proposed vehicle maintenance facility. The processing facility lease expires in 2017. The Aloun Farms facilities house all of their administrative support staff and process all of the produce grown on the property as well as other properties they have under lease elsewhere. Given the need for the Transit Vehicle Maintenance facility at some time when the initial segments of the transit system are being constructed (Page 2-39), early notification on a decision of which site will be selected would provide our tenant with as much time as possible to plan for a transition.

While an alternative Vehicle Maintenance and Storage Facility is shown adjacent to the existing HECO Substation at Ho'opili, we are concerned that the DEIS did not fully discuss the visual and noise impacts from 24-hour day operations on surrounding uses within the proposed Ho'opili project. Also not described, is the visual and land use impacts from the "Elevated Access Tracks" that would connect to the Fixed Guide-way on the proposed Ho'opili project.

In addition, the proposed transit maintenance facility located northeast of and adjoining to the HECO Ewa Nui Substation, as depicted in DEIS Figure 2-41, as well as Figure RP004a (Sheet 5) of Appendix A (Conceptual Alignment Plans and Profiles), would appear to preclude the planned development of an east-west internal Ho'opili roadway connection mauka of Farrington Highway to link the mauka Project lands to the east and west of the transit facility. The transit facility would appear to prevent the linkage of 1st Avenue and 2nd Avenue. This would require traffic between the mauka east and west Project areas to circulate on Farrington Highway to travel between the two areas, thus placing additional traffic volumes along Farrington Highway and increasing traffic volumes at the Farrington Highway intersections providing mauka area access to Project mauka area.

If the maintenance facility site in Ho'opili is selected, it would be desirable to locate the transit yard further east or west, or reconfigure the transit facility, to allow a corridor for roadway connection between the east and west sections of the Ho'opili area mauka of Farrington Highway. Another possibility would be to make a portion of the access/perimeter transit facility roadway a public roadway.

Page 2-38 Traction Power Substations—The project will require traction power substations approximately every mile. Are these substations planned to be located in the existing transit right-of-way below the elevated tracks or will a stand-alone site be required? Would the space requirements be limited to each site being 640 square feet (40 x 16) or will the actual footprint required be larger?

On page 3-53, in the "sidebar" entitled "Summary of Findings: Transportation Conditions and Effects", we note that under the category of "Effects of the Build Alternatives", there is no mention of the traffic impacts from cars generated from the "Proposed Park-and-Ride Lots" on streets immediately surrounding such facilities.

Table 4-1, Page 4-4, "Land Use (Section 4.1) – land acquired for transportation use" - While we would concur that approximately 88 acres of prime and statewide-important farmlands would be affected, the land in East Kapolei has long been planned as part of the Second City of Oahu. This is discussed on page 4-20 but not included in the summary of impacts on page 4-4. The implementation of the HHCTC project has long-term effects on the pattern of land use on Oahu. It will positively enhance and reinforce the linear pattern of development, reducing the pressure for development of agricultural lands in Central Oahu and rural areas elsewhere on the island. This is not discussed on page 4-20.

Table 4-1, Page 4-4, "Economic Activity (Section 4.2) – property tax revenue" - While we would concur that property acquired from private owners and converted to a transportation use would result in a direct reduction in property tax revenues, at least initially, over the long-term, with resulting higher-density transit-oriented development around transit stations, there will probably be a long-term net gain in property tax revenues, off-setting the initial loss in property tax revenues. This is discussed as an impact or possible outcome on pages 4-24 (also pages 4-166 and 4-167) but not included in the summary of impacts on page 4-4.

Table 4-1, Page 4-5, "Acquisitions, Displacements, and Relocations (Section 4.3)" - The land under the selected Vehicle Maintenance and Storage Facility site would eliminate either landowner's opportunities for development of their respective sites. In the case of the Ho'opili project, the impacts of the use of the site will not be limited to the loss of property, but a Vehicle Maintenance and Storage Facility at Ho'opili could have major visual and noise impacts on the surrounding land uses within the proposed Ho'opili project. As previously noted, the DEIS did not fully discuss the visual and noise impacts from 24-hour day operation of the Vehicle Maintenance and Storage Facility on surrounding uses within the proposed Ho'opili project. Also not described, is the visual and land use impacts from the "Elevated Access Tracks" that would connect to the Fixed Guide-way on the proposed Ho'opili project.

Page 4-10, Section 4.1.2 Affected Environment—This section includes the following three categories of Farmland:

1. Prime Farmland
2. Unique Farmland
3. Farmland of statewide importance

No reference is provided as to the sources for these categories. There have been a few studies such as the Land Evaluation and Site Assessment (LESA) system and the Agricultural Lands of Importance to the State of Hawaii (ALISH) system done over time with different rating and category systems for agricultural lands. Also, recently the Legislature enacted new laws on

designating Important Agricultural Lands (IAL). To minimize confusion, it maybe appropriate to either reference the three categories listed with the three other efforts or reference one or all of the three existing sources to identify agricultural lands in Hawaii.

Page 4-28, Figure 4-9 – While Figure 4-3 indicates the "Future Campus of UH West Oahu" and the "Future Salvation Army Kroc Center", Figure 4-9 does not indicate these important community resources and facilities, even though they are currently not in operation (but will be by the time the transit stations are built).

Pages 4-57 to 4-93 – Much emphasis was made on discussing the impacts of the elevated fixed guide-way from surrounding areas, however there did not appear to be any analysis of the visual impacts from the Vehicle Maintenance and Storage Facility, at either of the proposed locations. As previously noted, the DEIS did not appear to discuss the visual impacts from 24-hour day operation of the Vehicle Maintenance and Storage Facility on surrounding uses within the proposed Ho'opili project, including outdoor lighting pollution (assuming outdoor storage and maintenance). Also not described are the visual impacts from the "Elevated Access Tracks" that would connect to the Fixed Guide-way on the proposed Ho'opili project.

Page 4-103, Figure 4-39 – There is no mention of the noise impacts of the Vehicle Maintenance and Storage Facility on the proposed Ho'opili project. Also the noise impacts from the East Kapolei, UH West Oahu and Ho'opili transit stations are also not showu. We can assist by providing anticipated ambient noise levels at the Hoopili transit station site.

Page 4-171, Table 4-36 – There is no mention of DHHL's East Kapolei 1 (between UH West Oahu, North-South Road, Kapolei Parkway and Kapolei Golf Course) and East Kapolei 2 (between Ho'opili, North-South Road and Ewa Villages) projects.

We appreciate the opportunity to provide comments on the Draft EIS. Should you have any questions regarding this matter please feel free to contact us directly at 521.5661.

Sincerely,

Dean Uchida, Vice President

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

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DEPUTY DIRECTOR

June 11, 2010

RT10/09-337320

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

Dear Mr. Uchida:

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

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

The configurations included in the Draft and Final EISs are representative of the proposed configurations for most stations. Other configurations, such as the unique configuration of the Ala Moana Center Station, are possible depending on cost and technical issues. The City is receiving input from stakeholders and surrounding communities regarding station design.

In the Draft EIS, the terms mezzanine and concourse were used interchangeably. For the Final EIS, the term concourse is used to clarify the reference.

Transit center design criteria have been developed to accommodate bus transfers and other potential intermodal transfers. The size of each transit center depends on the number of buses and other modes to be accommodated, but they will fit within the space already identified in the individual station graphics shown in Chapter 2 (Figures 2-17 through 2-37) of the Final EIS.

While bus transfers will occur at most stations, the off-street bus transit centers will be constructed as part of the Project at four locations: UH West Oahu, West Loch, Pearl Highlands, and Aloha Stadium. Transit centers are discussed further in Section 2.5.6 of the Final EIS. Each station will have a secured public restroom; however, patrons will be required to ask the station attendant for access to the restroom. Security, including cameras, will be provided at all stations. The City, working with the Honolulu Police Department and community groups, will develop a security plan for the stations. Security measures are further discussed in Section 2.5.4 of the Final EIS.

Park-and-ride requirements could be accommodated through shared use. The park-and-ride demand shown in Table 3-22 of the Final EIS reflects the estimated weekday demand for an independently operating system. All or a portion of the capacity could be provided in shared facilities as long as weekday availability for transit users meets the demand identified in the Final EIS.

The Hoopili maintenance and storage facility would be 41 acres in size. Drawing No. RW006a in Appendix C has been corrected in the Final EIS to reflect this.

The Final EIS identifies the site near Leeward Community College as the preferred site for the maintenance and storage facility. If the preference for the location of the maintenance and storage facility changes, D.R. Horton will be notified as soon as practical.

The Hoopili maintenance and storage facility option would require large expanses of pavement to accommodate access to the guideway and a number of buildings, including maintenance facilities, a vehicle wash area, storage track, system control center, and employee parking. The proposed 41-acre site is an open flat agricultural area adjacent to an electrical substation. The maintenance and storage facility, including elevated access tracks, would contrast with the open, rural, country-like setting. In addition, the facility buildings and tracks would be highly visible from mauka foothill residences. Development of surrounding properties, however, would reduce the visual contrast of the maintenance and storage facility. Location of the maintenance and storage facility at this location would result in a moderate visual effect. Light and glare is expected to be low with a limited level of reflective surfaces and will be reduced further by appropriate design measures (see Section 4.8.3 Environmental Consequences and Mitigation). Overhead site lighting at the maintenance and storage facility will be provided for safety and visibility. The guideway will introduce an elevated linear structure and urban elements to what is currently an open, rural, and country-like setting.

The following measures will be incorporated into the Project's maintenance and storage facility regardless of its location to minimize adverse visual effects and enhance the visual and aesthetic opportunities that it creates. It should be noted, however, that the Leeward Community College maintenance and storage facility site is the preferred site for the Project.

- *Develop and apply design guidelines that will establish a consistent design framework for the Project with consideration of local context.*
- *Retain existing trees where practical and provide new vegetation.*
- *Shield exterior lighting.*

As discussed in Section 4.17.2 of the Final EIS, noise will be produced at either maintenance and storage facility. The nearest noise-sensitive use is approximately 700 feet from the center of the site near Leeward Community College. There are no noise-sensitive land uses near the Hoopili site. As a result, no noise impacts will occur due to the Project.

The Project will include an integrated noise blocking parapet wall at the edge of the guideway structure that extends three feet above the top of the rail and a system specification for vehicles with wheel skirts. The parapet wall will substantially reduce ground-level noise. Wheel skirts, which will be included as noise mitigation in project design, will increase the benefit of the parapet wall.

Measures to reduce noise levels above the track elevation, such as sound-absorptive materials in the track area, will be evaluated during preliminary engineering of the Project. Once the Project is operating, noise levels will be measured to determine the actual extent of project noise impacts.

To address linkages in the vicinity of the Hoopili site, some reconfiguration of the site is possible. The access roadway to the site could be public, but internal roadways serving the site would need to be secure.

With regard to conditions on Farrington Highway, Section 3.4.3 of the Final EIS presents information on a traffic analysis that was carried out for the two potential locations of the maintenance and storage facility. The analysis was based on the expected future roadway network serving the sites as well as future traffic volumes during the a.m. and p.m. peak periods. The results of the traffic analysis indicated that there will be no major effects on nearby intersections and roadways near either facility.

The locations of the traction power substations are shown in Appendix B of the Final EIS. They are generally located on the same property already being affected by the adjacent station; however, this is not possible in all locations. The sites will need to be large enough to house the substation and also to provide access for maintenance. For a stand-alone site not associated with a station or other project feature, the total site area will be approximately 50 by 60 feet. Text about traffic impacts resulting from the proposed park-and-ride facilities has been added to the summary of effects shown in Table 3-1 in the Final EIS.

The summary of environmental effects and proposed mitigation measures to avoid, minimize, or reduce impacts presented in Table 4-1 of the Draft EIS are specific to the land required for the Project. As described in Section 4.19.3 Cumulative Effects, of this Final EIS, current land use plans anticipate extensive development of the Ewa plain irrespective of whether or not the project is built. Thus, the project may have the effect of intensifying land use in the

areas near the planned stations; however, the overall development plan will not be substantially altered by the Project. The State of Hawaii prepared an Environmental Assessment (EA) of the effects of two major transportation projects, the North-South Road and Kapolei Parkway) in the Ewa area. The evaluated growth-inducing and cumulative impacts of the projects under the Hawaii Environmental Policy Act, see EA § 3.15.4.

In regards to property tax revenue, Table 4-1 in the Draft EIS illustrates direct effects from the Project. The discussion in Section 4.18.2 pertains to possible long-term effects that could be indirectly caused by implementation of the Project.

The title of Table 4-1 has been revised in the Final EIS to state "Summary of Direct Environmental Effects and Mitigation Measures to Avoid, Minimize, or Reduce Impacts." This should alleviate confusion between direct effects caused by the project and indirect effects that are discussed in Section 4.19 of the Final EIS.

Visual and noise effects at the Hoopili maintenance and storage facility are discussed in regards to an earlier comment in this letter. As discussed above, the Leeward Community College maintenance and storage facility option would require large expanses of pavement to accommodate a number of buildings including maintenance facilities, a vehicle wash area, storage track, system control center, and employee parking. The proposed 43-acre site near the Leeward Community College is vacant and undeveloped. This site is on a flat knoll makai of the H-1 Freeway/Farrington Highway interchange. The maintenance and storage facility buildings would be highly visible from low-lying areas makai of the interchange and from residences on the foothills above. However, the facility would not contrast substantially with elements of the surrounding visual character, which include the highway interchange, community college buildings, and adjacent parking lots.

Visual effects and mitigation at the Leeward Community College and Hoopili maintenance and storage facilities are discussed in response to previous comments in this letter. As presented in the Land Use Technical Report for this Project, relevant laws that define the land use types described in the Draft and Final EISs include:

- *Federal Farmland Protection Policy Act (FPPA) (7 USC 4201-4209).*
- *Hawaii Farmland Preservation Act (State of Hawaii Department of Agriculture, Act 183).*
- *The Geology, Soils, Farmlands, and Natural Hazards Technical Report identifies the source of the agricultural designations of "prime," "unique," and "statewide important" to be from the ALISH data with additional information provided by soils and land use data.*

If an area is designated as "prime" or "unique" yet has a planned or existing land use for development, this was taken into consideration when determining the suitability of the site for the transit system, as explained in Section 4.2 of the technical report. The technical reports are available on the Project website (www.honolulutransit.org).

In the Draft EIS, Figure 4-9 shows only the existing community resources and facilities within one-half mile, Kapolei to Fort Weaver Road. Table 4-36 of the Draft EIS presents planned and foreseeable actions in the study corridor. Both the Salvation Army-sponsored Kroc Center in Kapolei and the University of Hawaii West Oahu campus are listed.

Visual effects and mitigation at the Leeward Community College and Hoopili maintenance and storage facilities are discussed in response to previous comments in this letter. There is no noise-sensitive land use in the vicinity of the East Kapolei, UH West Oahu, and Hoopili stations or the Hoopili maintenance and storage facility site option. Per USDOT policy, proposed development that has not completed permitting for construction at the time of the Record of Decision is not considered in the noise impact analysis.

The Department of Hawaiian Home Lands East Kapolei 1 (Kanehili) and East Kapolei 2 projects have been added to Table 4-39, Planned and Foreseeable Actions in the Study Corridor, Section 4.19.3 Cumulative Effects, in this Final EIS.

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

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

D·R·HORTON® DHI Listed NYSE
America's Builder

SCHULER DIVISION

January 22, 2009

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

Dear Mr. Yoshioka:

Subject: Comments on the Draft Environmental Impact Statement (DEIS) for the Honolulu High Capacity Transit Corridor Project

These comments are being provided as an addendum to our comments of January 19, 2009.

Page 3-4, Tables 3-1 and 3-2 indicate that 6% of the 2,790,000 daily trips by residents use transit, and 5% of the 364,400 daily trips by visitors use transit in 2007. Thus, approximately 5.8% of the total daily resident and visitor trips use transit.

Page 3-23, Table 3-13 shows the no build alternative and the Airport-Salt Lake Alternative

	2007	2007	No Build	No Build	Airport-Salt Lake	Airport-Salt Lake
Resident Transit	165,900	6%	205,700	6%	248,200	7%
Resident Total	2,790,000		3,452,700		3,452,500	
Visitor Transit	17,600	5%	19,800	5%	23,700	6%
Visitor Total	364,400		430,700		431,400	
Total Transit	183,500	5.8%	225,500	5.8%	271,900	7%
Total Trips	3,154,400		3,883,400		3,883,900	

Page 3-36, Table 3-19 Estimated Transit User Benefits Resulting from 2030 Build Alternatives

It appears that the table extracted information from the Oahu OMPO Travel Demand Forecast Model.

Page 4-23, Section 4.2 Economic Activity. This section identifies the PUC as the primary location for non-agricultural jobs on Oahu (approximately 74%). The study reviewed trends and forecasts from the three development and sustainable plan areas in the study corridor (PUC, Ewa and Central Oahu). The job growth for the corridor was projected at 1 percent per year from 2000 to 2030.

Employment Forecast	2000	2030	Annual Growth Rate
Oahu	501,100	630,700	0.8%
Study Corridor	399,300	524,200	0.9%

We understand that the OMPO model makes certain assumptions regarding the jobs being generated in the Ewa-Kapolei Region. With the anticipated build out of the UHWO Campus, the Kroc Center and De Bartolo project on DHHL lands, and the anticipated development-redevelopment opportunities being created by the "Transit Oriented Development" (TOD) around the proposed transit stations, we would expect that the job generation numbers outside of the Primary Urban Center (PUC) would increase significantly and thus have some impact on the resident daily trips.

We believe that some analysis should be done to assess not only the reduction in vehicle trips for residents with the transit project but also the compounded impact of reduced vehicle trips due to quality jobs being created or relocated out of the PUC.

We appreciate the opportunity to provide comments on the Draft EIS. Should you have any questions regarding this matter please feel free to contact us directly at 521.5661.

Sincerely,

Dean Uchida, Vice President

DEPARTMENT OF TRANSPORTATION SERVICES

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May 21, 2010

RT1/09-296992R

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

Dear Mr. Uchida:

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

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

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

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

The Travel Demand Forecasting Model used for the Project reflects population and employment numbers anticipated with the development of Hoopili, UH West Oahu campus, Kroc

Center, and the De Bartolo project. However, based on FTA guidance, the model cannot account for the benefits resulting from transit-oriented development or increases in land use as a result of the fixed guideway project. Daily person trips and vehicle miles traveled for the No Build Alternative forecast travel patterns without the fixed guideway system.

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

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
Creation Date :	2/6/2009
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Submission Method :	Website
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Submission Date :	02/06/2009

Submission Content/Notes : February 6, 2009

Mr. Wayne Yoshioka, Director
DEPARTMENT OF TRANSPORTATION SERVICES
650 S. King Street 3rd Floor
Honolulu, Hawaii 96813

Dear Mr. Yoshioka;

Subject: Honolulu Rail Transit Draft Environmental Impact Statement Comments

I am writing this letter to provide comments on the Honolulu Rail Transit Draft Environmental Impact Statement on behalf of the Hawaii Chapter of the American Society of Landscape Architects.

The Honolulu rail transit presents many opportunities to improve the quality of life of Honolulu's residents and visitors. Through smart sustainable growth, light rail could create new long term economic opportunities, revitalize the sense of place of Honolulu's main streets and communities, protect environmental resources, and improve human health and quality of life.

The rail route is located on the main streets of several distinct Oahu communities: Waipahu, Aiea, Pearl City, Salt Lake City, downtown Honolulu and Kalihi. Seize this opportunity to build a rail system that reflects Hawaii's rich sense of place and helps build more vibrant communities. Promote smart development by rezoning areas near rail stations with higher density, abundant pedestrian and bicycling facilities, street trees and reducing automobile parking spaces.

Employ a sustainable design and construction approach that limits climate impacts, biodiversity loss and resource depletion. Link our natural and built systems to achieve a balanced environmental, social and economic outcome that improves the health of our communities and regenerates our environment. Don't degrade surrounding sites, risk human and environmental health or introduce new invasive plants. Use as many local products and recycled waste products as possible.

In summary, make human and environmental health, smart and sustainable development the top priorities and create a legacy we can all be proud of for many generations. Feel free to contact me at 223-8458 if you have any questions.

Sincerely yours,

Chris A. Dacus, President
Hawaii Chapter of the American Society of Landscape Architects
Box 246
Honolulu, Hawaii 96813

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-334593

Chris Da
Box 246
Honolulu, Hawaii 96813

Dear Chris Da:

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

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

Efforts are being undertaken to ensure that stations reflect the sense of place of the area where they are located. As discussed in Section 8.4 of the Final EIS, the City is conducting workshops with communities that will have rail stations. The purpose of the workshops is to engage the public about rail stations and provide opportunities to residents to contribute ideas about the appearance of station entryways in their areas. Ideas generated at the workshops will be incorporated into the station planning process. For more information and to get involved in this process, please visit the project website at www.honolulutransit.org.

The Project is focused on construction and implementation of rail transit service, which is evaluated in the Draft and Final EISs. As discussed in Section 4.19.2 of the Final EIS, transit-oriented development (TOD) is expected to occur in project station areas as an indirect effect of the Project. The increased mobility and accessibility that the Project may provide may also increase the desirability and value of land near stations, thereby attracting new real estate

investment nearby (in the form of TOD). Planning and zoning around station areas will be established by the City's Department of Planning and Permitting under the City's new TOD ordinance.

In March 2009 the City Council approved and the Mayor of Honolulu signed Bill 10 (2008) (Ordinance 09-4), which defines the City's approach to TOD around rail stations. Zoning regulations will address parking standards, new density provisions, open space (including landscaping and street trees), and affordable housing. Financial incentives could include public-private partnerships, real property tax credits, and infrastructure financing. While the Project is being coordinated with City and State agencies to encourage development of enhanced pedestrian and bicycle facilities and other land use changes near stations, the actual construction of such facilities and zoning changes are beyond the scope of this Project.

Sustainability, the local economy, the community, and the environment will continue to be considered during project development and construction. Chapter 4 of the Final EIS describes how overall energy demand, air pollution, and water pollution will decrease because of the Project.

A discussion on the possible introduction of invasive species to Oahu has been added to Section 4.18.9 of the Final EIS. Criteria for cleaning, inspection, and treatment of plants that are at risk of harboring pests will be part of the landscaping requirements. Species that can be harmful invaders or contribute to existing problems will not be used for project plantings. Construction equipment from other islands or counties will have to be pressure washed and inspected before being brought to the construction site. Plantings will favor native plants.

Lastly, effects to surrounding neighborhoods are described in Section 4.5 of the Final EIS. Additional information on the community health benefits of transit have been added to the Indirect Effects section of the Final EIS.

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

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
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Submission Method :	Website
Other Submission Method :	
Submission Date :	12/27/2008
Submission Content/Notes :	I believe the Draft EIS document has included all required disclosures pursuant to the National Environmental Protection Act. Also, I am in support of this project, as I believe it will have a long-term positive impact on our environment.

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-332259

Mr. Michael Dahilig
95-1081 Milia Street
Mililani, Hawaii 96789

Dear Mr. Dahilig:

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

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

Your assessment of the Draft EIS and support for the Project have been noted.

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

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
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Submission Date :	01/13/2009

Submission Content/Notes : Comments on "Honolulu High-Capacity Corridor Project Draft Environmental
Impact Statement
1/13/09

I wish to comment on noise considerations for the proposed new transit system for Honolulu having been a practicing acoustical engineer in Hawaii for over 20 years.

The most important thing is to have reasonable background noise levels in your home wherein you can use normal voice, TV and radio sound levels when a train goes by. You should not have to use strained, loud voices to talk to each other or to raise your TV remote volume every time a train passes by. During the quiet night time you should not be awaken by train passes.

The Department of Housing and Urban Development (reference 1) states: "Noise can cause or increase sleeplessness, irritability and anxiety. There have been numerous acts of violence, including murder, associated with noise. Noise negatively impacts health, safety, comfort and productivity".

Different Federal Agencies have different noise impact rules to protect you from excessive noise.

EPA recommends that ideally interior background noise levels of 45 decibels dBA Leq for residences (reference 2). In reference 1 HUD's regulations do not contain standards for interior noise levels. Rather a goal of 45 decibels is set forth and the attenuation requirements are geared toward achieving that goal. It is assumed that with standard construction any building will provide sufficient attenuation so that if the exterior level is 65 dBA Ldn or less, the interior level will be 45 dBA Ldn or less (the outdoor-to-indoor noise reduction implied is 20dBA).

Here in Hawaii many hundreds of housing units face traffic (and potentially transit) noise sources with open sliding glass doors on their lanais and open glass jaulosie windows having outdoor-to-indoor noise reductions of 10dBA or less allowing noise inside the homes that is subjectively twice (or more) as noisy as a 20 dBA noise reduction.

The Federal Highway Administration (FHWA) suggests interior levels of 52 decibels as being acceptable by taking "Feasibility" and "Reasonableness" into account. (Table 3-4, reference 3). The Federal Transit Administration (FTA) does not explicitly recommend acceptable indoor noise levels, but assumes that typical housing has 'quality' windows that are closed providing an outdoor-to-indoor noise reduction of 25dBA and honors HUD's exterior level of 65 dBA Ldn (page 3-10, reference 3).

Improper transit noise studies could lead to many families suffering excessive noise inside their homes. There could be class action law suits after the mainland consultants and contractors are gone. The DEIS must address the additional noise impact caused by many homes

now using natural ventilation year around with open lanai doors and windows and not the assumption that the 'typical' home has closed fenestration. After litigation, many hundreds of homes could get the needed new windows and doors to close for reducing traffic and transit noise as well as the needed air-conditioning. Who pays for this and the extra electric bill costs? Who pays the attorneys fees? What are the carbon energy footprint implications of all these additional AC units?

From the DEIS report I have these comments as well as technical questions which are numbered and underlined.

A) According to the Honolulu Advertiser article on 3/11/08, "severe noise" may occur at 55 locations, all at Salt Lake, and "moderate noise" at 397 other locations ...". This article only mentioned Federal Highway Administration (FHWA) rules from a Parsons Brinckerhoff's report dated 5/07/08.
The DEIS, now shows zero (0) "severe" noise impacts and "moderate" impact at only 49 locations and
seems to only mention Federal Transit Administration (FTA) rules. The Executive Summary states there are only 18 to 24 residential buildings subjected to "moderate impact".

It is now understood that the impact calculations in the 3/11/08 article did not include any noise reduction measures (reference 4).

A-1 Please explain what factors or considerations changed the overall noise analysis so favorably – noise reduction measures or noise impact criteria rules or what?

B) B-1 What source noise mitigation measures were assumed in the DEIS analysis?
B-2 Was slowing down the trains in any areas utilized to develop the final analyses to reduce noise impact in sensitive areas?

According to the Executive Summary in the DEIS, parapet walls and wheel skirts would only reduce noise levels by 2 to 5 dBA. The DEIS states that "sound-absorptive materials in the track area" and other mitigation measures will be evaluated during the preliminary engineering stage. Reference 3, Chapter 6 also states; "These mitigation measures work to maintain a rail system in its as-new condition. Without incorporating them into the system, noise levels could increase up to 10 dB."

B-3 When will these source mitigation measures be shown in the cost studies?
B-4 Shouldn't the DEIS state that specifications and maintenance of mitigation measures should include significant penalties for non-compliance? (reference 3, Chapter 6)

C) The low parapet walls allow a strong one-bounce noise path off the sides of the train to propagate to high-rise locations. See Figure 2.8 in reference 3.

C-1 Was sound absorption in the parapet walls considered to abate this phenomenon?
C-2 If not, why not?)

D) In Reference 3, Section 3.3, Pg. 3-14; it states "In some cases, both FHWA and FTA methods should be used, such as when both highway and transit cause significant noise, but at different times of day. An example would be a transit alignment that shares the right- of-way with an arterial road with heavy traffic. Traffic noise may dominate during the peak commuting hours but not during off-peak periods when transit continues to operate. In this case, both sets of criteria would be used to determine whether impact occurs from neither, one or each mode."

D)D-1 Have FHWA noise impact and mitigation methods been utilized in developing the DEIS, and, if not, why not?

E) Hawaii's famous weather allows natural ventilation in most homes with open windows all year around. This causes all types of traffic noise commonly to be at least twice as noisy inside many typical Hawaiian homes compared to typical homes on the mainland. FTA Standards assume that "typical buildings" have "about 25dBA outdoor-to-indoor noise reduction" with windows closed (Page 3-10, reference 3). I have measured outdoor-to-indoor nose reductions of only 7dBA with opened glass louvered windows and open lanai sliding glass doors having direct line-of-sight to the noise source. For example, such conditions will exist along Salt Lake Blvd. Perhaps 10dBA should be used for open Hawaiian housing.

E-1 Were outdoor-to-indoor noise reduction data of typical open fenestration obtained from measurements or the literature?

E-2 Was the quality of fenestration in buildings considered since it includes:
a) open to closed sliding doors on lanais; b) open jalousies to closed jalousies with window AC units and c) open sliding glass windows to fixed glass windows with central AC.?

E-3 For estimating noise mitigation costs what interior noise level was considered acceptable?

E-4 Was there a count of housing units requiring AC units for sound proofing and some consideration of operating costs for the home owner?

F) To account for such unique phenomena, Table 3-4, FHWA Abatement Criteria in reference 3 states that FHWA allows individual state agencies (with their consultants) to define the actual criteria that trigger mitigation studies (sound proofing) of potentially impacted residences. Table 3-4 implies outdoor-to-indoor noise reductions of 15 dBA can be assumed to allow outdoor noise levels of 67dBA Leq(h) to be the triggering criteria noise level for sound proofing of homes allowing 52dBA Leq(h) inside the homes.

Note for homes with normal, closed windows; the 67dBA triggering outdoor noise level allows about 7dB more (may be twice as noisy) than recommended by EPA (reference 2) for interior levels. For homes with open windows and doors, interior levels may be about 15dBA greater (maybe three times noisier) than EPA's recommendations. Our state agency (with their consultants) should address our unique low outdoor-to indoor noise reduction for our many naturally ventilated homes.

In mainland housing with heating and/or air conditioning, sound proofing may include replacing or upgrading windows and doors. As a starting point, reference 3, page 3-15, considers the cost range of $25,000 to $30,000 (2002 mainland dollars) per benefited residence to be reasonable. This estimate does not include some kind of air conditioning that would have to be considered in sound proofing naturally ventilated Hawaiian homes.

F-1 Were any estimates calculated for noise levels inside typical homes along the guideway and, if so, what levels were found?

G) Reference 3, Section 6.5 states: maximum noise level "is often desirable to include computations of L max in environmental documents, particularly for rail projects, because the noise from an individual train passby is quite distinguishable from the existing background noise" L max ....should be reported in environmental documents."

G-1 Were maximum noise levels calculated? If not, why not?

H) How noisy would the proposed transit system be to residents with open windows and doors if there was no motor vehicle traffic noise? Using outdoors-to-indoors noise reductions of 10 dBA, the transit "Noise Exposure" levels shown in Figures 4-39 to 4-42 indicate that 91% of all 42 residential locations measured would be in excess of HUD guidelines and 29% would be in excess of FHWA guidelines.
Over the next decade or so, the makeup of motor vehicular traffic may be radically modified e.g. there may be all electric vehicles such that engine noise would be substantially reduced. Also it is possible that tire/road interfacing noise may be reduced by new breakthroughs in tire tread design and road pavement design as will as enforcing vehicle speed limits by high-tech devices.

H-1 Were these possibilities considered?

I) Reference 3, Chapter 3, Table 3.3 notes that the "Allowed Noise Exposure Increases" decrease as the cumulative noise level increases. "The justification for this is that people already exposed to high levels of noise should be expected to tolerate only a small increase in the amount of noise in their community."

The "Existing Ldn" traffic noise levels shown in Figures 4-39 to 4-42 indicate that about three-fourths (75%) of all 42 residential locations with closed windows are in excess of HUD and FHWA guidelines and that all (100%) of housing with open fenestration are in excess of HUD

guidelines and 79% are in excess of FHWA guidelines.

Thus most residents along the proposed guideway are already exposed to high levels of traffic noise, it is predictable that some residents may complain about the additional noise from the transit and take legal action, particularly since the new noise will be quite distinguishable from the existing background noise.

Note that in some cases the transit noise may dominate over regular traffic during peak rush hours when traffic slows down to stop-and-go levels (Levels of Service D through F) as well as after, say 10 pm, causing residents to positively identify transit noises and to be more conscious and irritative of them during times of high cumulative noise levels.

I-1 Because building noise reduction is so low in so many residential units and people may be already irritated by high traffic noise levels, does it not behoove the project to incorporate all stated noise mitigation measures shown in reference 3, Table 6-12 in order to improve the lifestyle of impacted residents as well to reduce the probability of class action law suits?

Reference 1 U.S. Department of Housing and Urban Development, HUDnoise.com

Reference 2 "EPA Levels Document", EPA 550/9-79-100, Nov. 1978

Reference 3 "Transit Noise and Vibration Impact Assessment", FTA-VA-90-1003-06, May 2006

Reference 4 the DEIS, "The Sound of Transit Operations" by Lawrence Spurgen

Mahalo,

Ron Darby, P.E.
44-401 Kaneohe Bay Dr.
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DEPARTMENT OF TRANSPORTATION SERVICES

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT1/09-295764

Mr. Ronald Darby
44-401 Kaneohe Bay Drive
Kaneohe, Hawaii 96744

Dear Mr. Darby:

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

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

Response to A-1: Noise reduction measures of wheel skirts, sound absorptive material and short noise barriers (parapet walls) were added to the Project. These measures successfully mitigate noise impacts. FTA noise impact criteria were used for both analyses.

Response to B-1: Wheel skirts, sound absorptive material and short noise barriers (parapet walls) were included in the Project design, resulting in a substantial reduction in noise.

Response to comment starting "According to the Executive Summary in the Draft EIS ...": The above quotation regarding mitigation measures is a footnote from Table 6-12 in the FTA Manual that specifically refers to wheel and track maintenance activities and is not relevant to the use of wheel skirts or parapet walls.

Response to B-2: No, slowing down the trains was not a mitigation measure used to reduce noise impact in sensitive areas.

Response to B-3: Parapet walls, wheel skirts, and sound absorptive material are included in the Project cost estimate presented in Section 6 of the Final EIS.

Response to B-4: The Project will include a maintenance program, the cost of which is covered in the operating and maintenance cost estimates. Maintenance includes all elements of the Project, including the parapet walls and noise mitigation elements. Penalties for non-compliance of maintenance activities are outside of the scope of this Project.

Response to C and C-1: The need for this additional acoustical treatment was preliminarily evaluated in the Draft EIS. The Final EIS includes the results of the analysis at high-rise locations, where this treatment is applicable.

Response to D and D-1: This is a Rail Transit project, not a "highway/transit project" as presented in Section 3.3 of the FTA Guidance Manual.

Response to E-1: It is unclear to what "data" the commenter is referring in question E-1. Following FTA Guidelines, the environmental team did not analyze indoor noise levels.

Response to E-2: Consideration of the quality of building features would only be necessary if the features were of obvious substandard condition or quality and were unlikely to provide standard acoustical performance when closed. This is not the condition in the project area.

Response to E-3: The FTA noise analysis bases the impact analysis on the change in exterior noise level caused by the Project. Therefore, the interior noise levels were not analyzed.

Response to E-4: As the Project will not cause any severe adverse noise impacts, air conditioning equipment will not be necessary or installed.

Response to F: This is an FTA project, not an FHWA highway project; thus, FTA impact evaluation methodology and criteria apply. The criteria of other agencies, such as the Federal Aviation Administration (FAA) and the Environmental Protection Agency (EPA), apply to undertakings of those agencies.

Response to F-1: FTA criteria apply to outdoor human use areas; therefore, indoor noise levels were not addressed.

Response to G-1: According to the FTA Manual (p. 2-25, Section 2.5.7), "The Lmax descriptor is not recommended for transit noise impact assessment...". Separately described maximum noise levels are not necessary to the calculation of the Day Night Average Sound Level (Ldn) which is the prescribed metric (sound descriptor) to be used in an FTA noise impact analysis for residential uses or the Equivalent Sound Level (Leq) that is used for sensitive uses

without a "sleeping" component. The maximum sound level is included in the Sound Exposure Level descriptor of rail transit noise that was used to calculate future project operational Ldn and Leq noise levels. The information provided in Appendices E and F of the FTA Guidelines may be used to calculate the Lmax if desired.

Responses to H and H-1: The same decibel level would be with motor vehicle noise present. The Project noise exposure values presented in the Final EIS include only project-generated noise. The Project is an FTA project; therefore, FTA criteria are applicable. Future noise reduction measures are speculative, and are not considered.

Response to Section I: Comment noted.

Response to I-1: All appropriate, feasible, and reasonable noise mitigation measures were discussed in the Draft EIS. As previously noted, areas experiencing noise impacts have received additional mitigation analysis in the Final EIS and additional mitigation has been committed where it is feasible and reasonable to do so.

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

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

K1107-02601 1

Comments on DEIS Chapter 4.9 (Noise and Vibration) and Technical Report RTD 2008f
(Honolulu High-Capacity Transit Corridor Project Noise and Vibration Technical Report)

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1/22/09

A. Additional information and comments related to determining noise impact in my first submittal, reference 1.

Reference 2 states "*For residential land use, the noise criteria are to be applied outside the building locations at noise-sensitive areas with frequent human use including outdoor patios, decks, pools, and play areas . If none, the criteria should be applied near building doors and windows. ..... However, for locations where land use activity is solely indoors, noise impact may be less significant if the outdoor-to-indoor reduction is greater than for typical buildings (about 25 dB with windows closed). Thus, if the project sponsor can demonstrate indoor activity only, mitigation may not be needed*".

However, in Hawaii many residential buildings were built for natural ventilation only, often using operable glass jalousies and open sliding glass doors to enjoy our tradewinds. Table 7: "Building Noise Reduction Factors" of reference 3 shows the outdoor-to-indoor noise reduction of open windows to be 10 dBA and includes: ***"NOTE:****The windows shall be considered open unless there is firm knowledge that the windows are in fact kept closed almost every day of the year."*

Even when a window air-conditioner is used with the jalousies closed, the outdoor-to-indoor noise reduction is less than 20 dBA depending largely on the degree of air-tightness that can be achieved.

In order to illustrate the impact of traffic and transit noise on the interior of Hawaiian homes along busy roadways that may have transit guideways, I have modified Figure 3-1 from reference 2. See attachment. It contains the standard plot for measured noise levels obtained at exterior locations near buildings as well as interior noise levels assuming an outdoor-to-indoor noise reduction of 20 dBA for random buildings as circles and the same buildings as asterisks if the noise reduction was only 10 dBA, e.g. open windows.

It can readily seen that many of the buildings cited in Appendix A of reference 4 that are now considered "No Impact" or "Moderate Impact" should be "Moderate Impact" or "Severe Impact" if open windows are acknowledged.

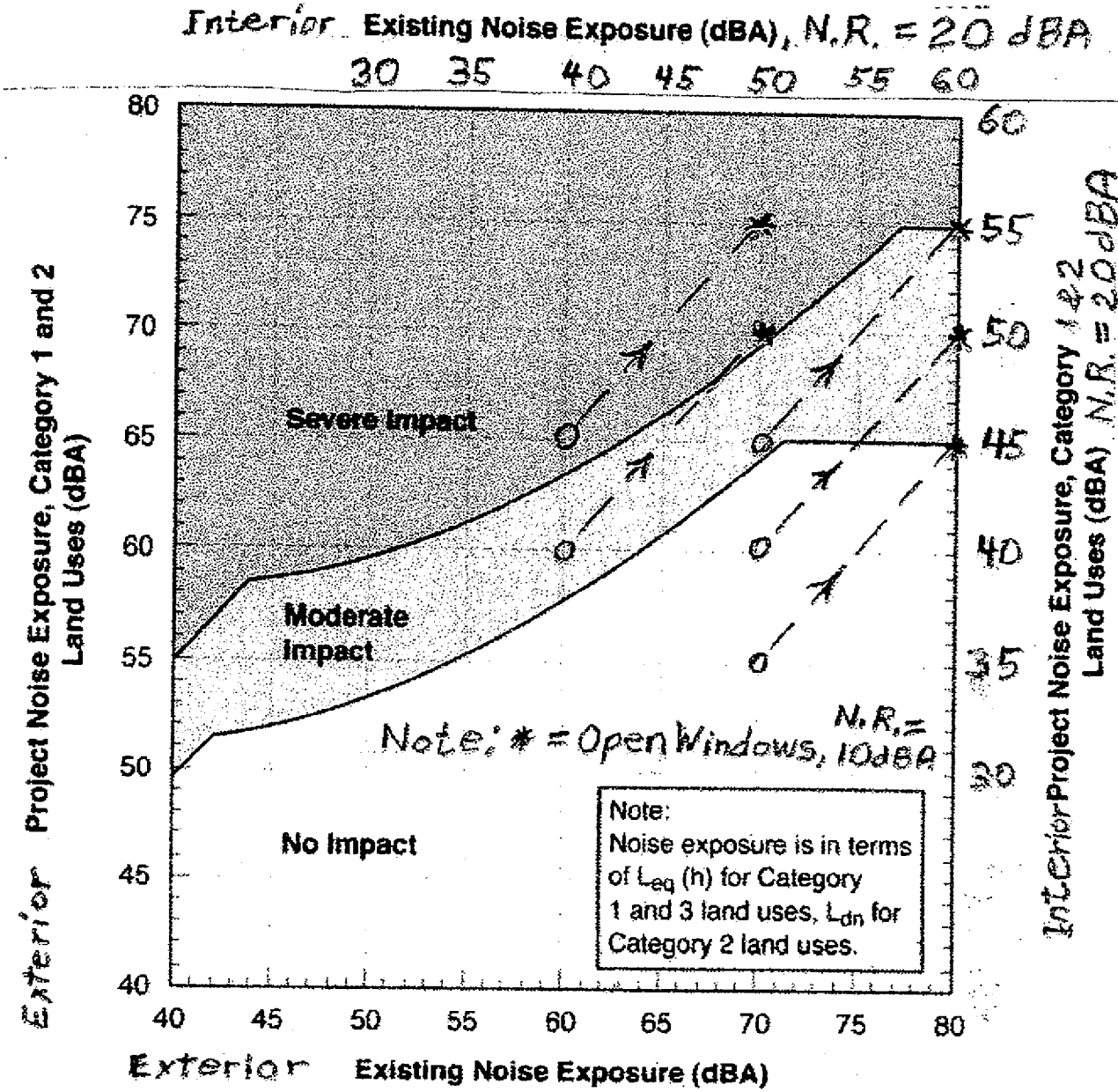
The DEIS should refine the concept of the modified Figure 3-1or create some other means to account for the diversity of fenestration found in Hawaiian buildings and factor it into the "Projected Project Noise Exposure Levels" in Appendix A in reference 4.

reference 1- 'Comments on "Honolulu High-Capacity Corridor Project Draft Environmental Impact Statement', 1/13/09 - Ron Darby

reference 2- "Transit Noise and Vibration Impact Assessment", FTA-VA-90-1003-06, May 2006

reference 3- HIGHWAY TRAFFIC NOISE ANALYSIS AND ABATEMENT POLICY AND GUIDANCE, U.S. Department of Transportation, Federal Highway Administration, Office of Environment and Planning, , Noise and Air Quality Branch, Washington, D.C., June 1995

reference 4- "Noise and Vibration Technical Report Honolulu High Capacity Corridor Project", C/C Honolulu, Oct. 1 2008



Modified **Figure 3-1. Noise Impact Criteria for Transit Projects**

AR00001628

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT1/09-296679R

Mr. Ronald Darby
44-401 Kaneohe Bay Drive
Kaneohe, Hawaii 96744

Dear Mr. Darby:

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

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

The noise analysis conducted for the EIS follows Federal criteria. Please refer to the Noise Technical Report available on the project website (www.honolulutransit.org) for more information on the methodology of the noise analysis. It is outside the scope of this Project to redefine Federal guidelines.

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

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
Creation Date :	11/12/2008
Creator Affiliation :	
First Name :	Carol
Last Name :	Davis
Business/Organization :	Retired
Address :	520 Uluoa Street
Alternative Preference :	
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Telephone Extension :	
Add to Mailing List :	Both
Submission Method :	Website
Other Submission Method :	
Submission Date :	11/12/2008
Submission Content/Notes :	I am a retired State worker who is a supporter of rail. When I worked I heard a lot of comments from mothers of young children who said that they didn't ride the bus because they needed their cars in case their children got sick unexpectedly and they needed to get to them quickly. I recently returned from a trip to Washington, D.C. and rode their great Metro system. In their Metro brochure on fares and passes I noticed a "Guaranteed Ride Home" phone number where people can register in advance for a ride home in case of an unexpected personal emergency or unscheduled overtime. Has anything like this been discussed in the planning of the rail system for Honolulu?

DEPARTMENT OF TRANSPORTATION SERVICES

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-330422

Ms. Carol Davis
520 Uluoa Street
Kailua, Hawaii 96734

Dear Ms. Davis:

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

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

"Guaranteed Ride Home" can be a beneficial program for companies to offer their employees. One of the benefits of the fixed guideway system is that in many cases, parents may be able to travel to their children's school or daycare more quickly on the rail than by road. However, Guaranteed Ride Home would not be a service provided by the transit agency but may be offered by private employers.

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

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
Creation Date :	2/6/2009
Creator Affiliation :	
First Name :	albert
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Telephone :	8085263287
Telephone Extension :	
Add to Mailing List :	Email
Submission Method :	Website
Other Submission Method :	
Submission Date :	02/06/2009

Submission Content/Notes : Comments re: Draft EIS Honolulu High Capacity Corridoor Project

Flawed selection and alternative process: Public not consulted in the development of route alternatives or type of plan. Toll lanes could accommodate bus, taxi, tour bus, handicap vans, emergency vehicles, and enforcement, and be utilized 24 hours a day instead of mostly peak hours. The toll alternative would be viable only if multipurpose and flowed to university, and Waikiki, and tie into the windward, and eastward traffic. Alternatives to split ewa and central traffic flows, and to facilitate Pali, Like Like, and H1 east have not developed or pursued.

Existing and future transit populations neglected. The Dillingham and Kakaako route flow through low population light industrial in Kalihi, and future middle to high income residential in the urban core kakaako. A Waipahu, pearl city, pearl ridge, Salt lake boulevard, king street, olomea, vineyard, punchbowl , king, to university route, with spurs to the airport, Waikiki by university avenue or kalakaua with connection to Ala moana and the convention center would serve the highest existing and future low and moderate income residential, and tourist populations. A king vineyard route, weather multipurpose or single use, ties in fluidly with windward and eastward traffic, reaches the legislature, city council, courts, state and county services, provides healthcare alternatives at Straub, Kuakini, Queens, and Kaiser hospitals, offers greater access to university and college resources, access to entertainment venues like blaisdell has the most development potential along streets with ample room for additional private and pubic transportation, possesses existing excess capacity and right of ways, is the most direct route, and would bring tourist directly to the capital, historic, and arts district.

Rail oriented cities developed around historic freight and passenger rail with links to intercity and interstate rail lines. A king street orientation could be an inner city backbone and effectively facilitate inner city passengers within and to the urban core. Intercity extensions to central or ewa and leeward could be secondary. The most congested area is from Pearl City to University, the primary urban core. Park and ride at Pearl city juncture could aid feeder buses to a multi purpose toll, bus, or rail.

Major populations excluded. No plan considers the future and existing population in Central Oahu (planned for thousands of residences), or the isolated low to moderate income public transit intensive Leeward coast. The Kapolei portion is inferior to a King, university route where multifamily low to middle income populations already reside and are bordered by high density underutilized residential and mixed use zoned real estate. Future middle to high income single family suburban communities in Central and Ewa plains will be two to three car households as they mature, and are not typical public transit intensive communities. Windward, and eastward traffic is completely ignored. Kapolei route may provide developers the infrastructure for rapid urbanization of the ewa plain.

Full utilization of rail capacity will not likely be achieved with projected population of 1.13 million by 2035, a maximum honolulu population of

1.5m or 2m at most, and projected populations far below comparable rail oriented cities. Riders will at first be intercity displaced bus riders, with the remaining rider predictions questionable. Inner city transport will not be served by the current choice. The cost of an additional transit authority has not been determined. The city is unable to maintain its existing infrastructure. Higher subsidies and fees for the bus and the rail seem likely. A multipurpose elevated toll, bus, or rail could generate additional revenue and provide flexibility.

Lack of coordination between city and state to resolve congestion. insufficient plan to accommodate existing automobiles and additional 100,000 or more cars by 2035, and county failure to utilize existing capacity and to complete arterial lane improvements, are the most pressing quality of life and productivity issues facing the island of oahu.

Federal funds should be devoted to the highest volume transit projects, and possibly ones that have sought and obtained private investors. Projects that accelerate urban sprawl and exacerbate traffic congestion need to be discouraged. Intercity routes to outlying, isolated, existing populations, inner city backbones, or connecting intercity lines ought to be considered separately, with inner city lines as a priority.

DEPARTMENT OF TRANSPORTATION SERVICES

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MUFI HANNEMANN
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DEPUTY DIRECTOR

May 21, 2010

RT10/09-337451

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

Dear Mr. Del Rio:

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

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

The overall public information program has been continuous since the beginning of the Project in 2005. The Alternatives Analysis phase evaluated a range of transit mode and general alignment alternatives in terms of their costs, benefits, and impacts. During the fall of 2005 and winter of 2006, the City and County of Honolulu completed the alternatives screening process that is documented in the Honolulu High-Capacity Transit Corridor Project Alternatives Screening Memorandum (DTS 2006a). Scoping meetings were held and included a presentation of alternatives to the public and interested agencies and officials in which they could provide comments on the Purpose and Need, alternatives, and scope of the Alternatives Analysis. Refinements were made to the alternatives based on this input. In total, 75 fixed guideway alignment options were screened.

Scoping for the NEPA process confirmed that there were no alternatives that had not been previously studied and eliminated for good cause that would satisfy the Purpose and Need at less cost, with greater effectiveness, or less environmental or community impact.

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

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

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

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

The Managed Lane Alternative would have generated the greatest amount of air pollution, required the greatest amount of energy for transportation use, and would have resulted in the largest number of transportation noise impacts of all the alternatives evaluated. Because the Managed Lane Alternative would have served a shorter portion of the study corridor, it would have resulted in fewer displacements and would have impacted fewer archaeological, cultural, and historic resources than the Fixed Guideway Alternative. The Managed Lane Alternative would not have affected any farmlands. Visually, the elevated structure would have extended a

shorter distance, but it would have been more visually intrusive because its elevated structure, with a typical width of between 36 and 46 feet, would have been much wider than the Fixed Guideway Alternative.

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

Various highway improvements have been considered for Oahu. The State of Hawaii Department of Transportation, which is responsible for the freeway system, has evaluated needs for the freeway system and identified the highway projects that would be most efficient at reducing congestion on Oahu. The projects are listed in Table 2-4 of this Final EIS and included in the analysis for all project alternatives. Broad island-wide transportation approaches were reviewed by the OahuMPO during the development of the 2030 Oahu Regional Transportation Plan (ORTP). The selection of a fixed guideway transit system began with that planning process.

Existing and future transit populations are not neglected. As stated in Section 1.2 of the Final EIS, 63 percent of Oahu's population and 80 percent of employment are located within the study corridor. By 2030, these distributions will increase to 69 percent and 83 percent, respectively.

Ridership projections for the forecast year of 2030 have been developed using the travel demand model used by the Oahu Metropolitan Planning Organization (OahuMPO), which was calibrated and validated to current year conditions. The OahuMPO model is based on "best practices" for urban travel models in the U.S. and consistent with guidance from the FTA. The model is updated approximately every five years to reflect changes in land use, socio-economic conditions, and transportation network improvements. The model is approved by the OahuMPO Technical Advisory Committee. The model is based upon a set of realistic input assumptions regarding land use and demographic changes between now and 2030 and expected transportation levels-of-service on both the highway and public transit system. Based upon the model and these key input assumptions, approximately 116,000 trips per day are expected to use the rapid transit system on an average weekday in 2030. Since the Draft EIS was published, the travel demand model has been refined by adding an updated air passenger model, defining more realistic drive access modes to project stations and recognizing a more robust off-peak non-home-based direct-demand element based on travel surveys in Honolulu.

Figures 3-9 and 3-10 in the Final EIS present revised ridership numbers for each fixed guideway station. As shown in Figure 3-9, between 650 and 820 passengers will exit the fixed guideway system at each station between Kalihi and Iwilei during the a.m. two-hour peak period. In addition, 840 passengers will exit the system at Kakaako during the a.m. two-hour peak period.

Similar alignments following North and South King Streets were evaluated in the Alternatives Analysis and would have resulted in less transit use than the Project. While an alignment on South King Street would have served some areas beyond walking distance to project stations, it would not have served several areas of dense development, including Chinatown, Downtown, Kakaako, and Ala Moana Center, and would have resulted in fewer

overall transit-user benefits. The South King Street alignment had low ridership and served the fewest number of residences and employment areas of all the alignments studied in the downtown area. In addition, it would not have offered good connections for a future extension to Waikiki. The North King Street alignment was rejected because it impacted a greater number of historical properties and cultural practices, had higher capital costs, had greater noise impacts than the Dillingham Boulevard alignment, and was inefficient to connect to the Airport or Nimitz Highway near Chinatown. Vineyard Boulevard was ruled out during the screening process because it was located farther from commercial and employment areas.

As noted in Section 2.5.6 of the Final EIS, bus service will be enhanced and the bus network will be modified to coordinate with the fixed guideway system. Some existing bus routes would be altered or eliminated to reduce duplication of services provided by the fixed guideway system. Buses removed from service in the study corridor would be shifted to service in other parts of the island. Future bus routes and frequencies are shown in Appendix D in the Final EIS.

As stated in Chapter 2 of the Final EIS, a park-and-ride facility will be located at Pearl Highlands Station near where the H-1/H-2 Freeways merge. In addition, Central Oahu will be served by enhanced bus service connecting to the fixed guideway at Pearl Highlands. As stated in Chapter 3 of the Final EIS, system improvements, including traffic signal priority, automated vehicle identification, and off-vehicle fare collection, could complement frequent bus service at the East Kapolei, Pearl Highlands, and Ala Moana Center Stations. These bus improvements will reduce travel time and improve intermodal transfers. Bus and fixed guideway departures and arrivals will be coordinated and predictable to minimize transfer time and total trip time.

In addition, Table 3-14 in the Final EIS shows an 18-percent decrease in vehicle hours of delay islandwide with the project versus without. Figure 3-8 shows that there will be transit user-benefits islandwide because of the Project, while Figure 3-5 shows benefits for transit-dependent households. Accordingly, Central Oahu and Leeward residents will experience benefits with the fixed guideway alignment from East Kapolei to Ala Moana Center via the Airport.

The effectiveness of rail transit is more closely linked to the population density of an area served than to the total population of an area. As described in Chapter 1 of the Final EIS, the majority of the population on Oahu is located in a narrow corridor, which makes it ideal to support rail transit.

Forecasts indicate that riders who are predicted to use the train are those who will find it is more beneficial than another transportation alternative. Some fixed guideway riders are those that currently use TheBus or other modes. Forecasts indicate that more than 40,000 vehicles will be removed from roadways as a result of the Project. Most guideway systems are attractive to automobile users because of the time benefit and the lower stress levels during the ride.

The funding of operating and maintenance costs is described in Chapter 6 of the Final EIS. The City Council's current policy is that between 27 percent and 33 percent of operating costs of the transit system (TheBus, TheHandi-Van, the fixed guideway, etc.) must be recovered from fares collected. Unless that policy is changed, the subsidy will be about 70 percent of the operating cost. In 2030, the operating cost of the fixed guideway will be about $77 million each year in 2009 dollars (compared to $222 million for TheBus and TheHandi-Van). After applying farebox revenues, the operating cost of the fixed guideway will be about $54 million each year and will be allocated from the City's annual budget as is currently done for all transit services.

The OahuMPO is responsible for coordinating transportation planning on Oahu. The OahuMPO is comprised of City and State officials. The ORTP is a long-term vision document that outlines transportation goals, objectives, and policies for Oahu. The ORTP guides future development of the major surface transportation facilities and programs. The ORTP contains roadway improvements planned for the island. These improvements were included in the travel forecasting conducted for the Project. A list of projects is shown in Table 2-3 of the Final EIS. The ORTP includes City and State projects.

The Project addressed in the Draft and Final EISs is the best option among those studied in the Alternatives Analysis and approved by the City Council in 2006.

Lastly, the Project is focused exclusively on construction and implementation of rail transit service, which is evaluated in the EIS. As mentioned in Section 4.19.2 of the Final EIS, transit-oriented development (TOD) is expected to occur in project station areas as an indirect effect of the Project. This will change the trend toward urban sprawl and is made possible largely by the fixed guideway's influence on the patterns of growth around stations and along the route. Planning and zoning around station areas will be conducted and established by the City's Department of Planning and Permitting in compliance with the City's new TOD ordinance (09-004).

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Issuance of the Record of Decision under NEPA and acceptance of the Final EIS by the Governor of the State of Hawaii are the next anticipated actions and will conclude the environmental review process for this Project.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Hirata, Gregg

From: Albert James Del Rio [albert.delrio@hawaiiantel.net]

Sent: Friday, February 06, 2009 10:02 AM
To: Mayor Mufi Hannemann
Cc: Albert James Del Rio
Subject: draft eis comments transit

Comments re: Draft EIS Honolulu High Capacity Corridoor Project

Flawed selection and alternative process: Public not consulted in the development of route alternatives or type of plan. Toll lanes could accommodate bus, taxi, tour bus, handicap vans, emergency vehicles, and enforcement, and be utilized 24 hours a day instead of mostly peak hours. The toll alternative would be viable only if multipurpose and flowed to university, and Waikiki, and tie into the windward, and eastward traffic. Alternatives to split ewa and central traffic flows, and to facilitate Pali, Like Like, and H1 east have not developed or pursued.

Existing and future transit populations neglected. The Dillingham and Kakaako route flow through low population light industrial in Kalihi, and future middle to high income residential in the urban core kakaako. A Waipahu, pearl city, pearl ridge, Salt lake boulevard, king street, olomea, vineyard, punchbowl , king, to university route, with spurs to the airport, Waikiki by university avenue or kalakaua with connection to Ala moana and the convention center would serve the highest existing and future low and moderate income residential, and tourist populations. A king vineyard route, weather multipurpose or single use, ties in fluidly with windward and eastward traffic, reaches the legislature, city council, courts, state and county services, provides healthcare alternatives at Straub, Kuakini, Queens, and Kaiser hospitals, offers greater access to university and college resources, access to entertainment venues like blaisdell has the most development potential along streets with ample room for additional private and pubic transportation, possesses existing excess capacity and right of ways, is the most direct route, and would bring tourist directly to the capital, historic, and arts district.

Rail oriented cities developed around historic freight and passenger rail with links to intercity and interstate rail lines. A king street orientation could be an inner city backbone and effectively facilitate inner city passengers within and to the urban core. Intercity extensions to central or ewa and leeward could be secondary. The most congested area is from Pearl City to University, the primary urban core. Park and ride at Pearl city juncture could aid feeder buses to a multi purpose toll, bus, or rail.

Major populations excluded. No plan considers the future and existing population in Central Oahu (planned for thousands of residences), or the isolated low to moderate income public transit intensive Leeward coast. The Kapolei portion is inferior to a King, university route where multifamily low to middle income populations already reside and are bordered by high density underutilized residential and mixed use zoned real estate. Future middle to high income single family suburban communities in Central and Ewa plains will be two to three car households as they mature, and are not typical public transit intensive communities. Windward, and eastward traffic is completely ignored. Kapolei route may provide developers the infrastructure for rapid urbanization of the ewa plain.

Full utilization of rail capacity will not likely be achieved with projected population of 1.13 million by 2035, a maximum honolulu population of 1.5m or 2m at most, and projected populations far below comparable rail oriented cities. Riders will at first be intercity displaced bus riders, with the remaining rider predictions questionable. Inner city transport will not be served by the current choice. The cost of an additional transit authority has not been determined. The city is unable to maintain its existing infrastructure. Higher subsidies and fees for the bus and the rail seem likely. A multipurpose elevated toll, bus, or rail could generate additional revenue and provide flexibility.

Lack of coordination between city and state to resolve congestion. insufficient plan to accommodate existing automobiles and additional 100,000 or more cars

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by 2035, and county failure to utilize existing capacity and to complete arterial lane improvements, are the most pressing quality of life and productivity issues facing the island of oahu.

Federal funds should be devoted to the highest volume transit projects, and possibly ones that have sought and obtained private investors. Projects that accelerate urban sprawl and exacerbate traffic congestion need to be discouraged. Intercity routes to outlying, isolated, existing populations, inner city backbones, or connecting intercity lines ought to be considered separately, with inner city lines as a priority.

Albert Del Rio
526-3287

AR00001641

DEPARTMENT OF TRANSPORTATION SERVICES

MUFI HANNEMANN
MAYOR

CITY AND COUNTY OF HONOLULU

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WAYNE Y. YOSHIOKA
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SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT10/09-336312

Mr. Albert Del Rio
albert.delrio@hawaiiantel.net

Dear Mr. Del Rio:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

The overall public information program has been continuous since the beginning of the Project in 2005. Chapter 2 of the Final EIS summarizes the alternatives screening and selection process. Beginning in the fall of 2005, an initial screening process considered alternatives identified through previous transit studies, a field review of the study corridor, an analysis of current population and employment data for the study corridor, a literature review of technology modes, ongoing work completed as part of the Oahu Regional Transportation Plan 2030 (ORTP) prepared by the Oahu Metropolitan Planning Organization (OahuMPO) (OahuMPO 2007), and public and agency comments received during the formal Alternatives Analysis scoping process.

The screening process is documented in the Honolulu High-Capacity Transit Corridor Project Alternatives Screening Memorandum (DTS 2006a). Three scoping meetings were held during the screening process in December 2005, which included a presentation of initial alternatives to the public, interested agencies, and officials to receive comments on the Purpose

and Need, alternatives, and scope of the Alternatives Analysis. Refinements were made to the alternatives based on the public input during scoping.

After completion of screening in the winter of 2006, the following alternatives were studied in the Alternatives Analysis: No Build Alternative, Transportation System Management (TSM) Alternative, Managed Lane Alternative, and the Fixed Guideway Alternative. After review of the Alternatives Analysis Report and consideration of public comments, the City Council identified a fixed guideway transit system extending from Kapolei to UH Manoa with a connection to Waikiki as the Locally Preferred Alternative. This identification, which eliminated the TSM and Managed Lane Alternatives from further consideration, became Ordinance 07-001 on January 6, 2007. The NEPA process considered a range of alternatives that was consistent with the identified Locally Preferred Alternative. As discussed in Section 2.2, there were no alternatives that had not been previously studied and eliminated for good cause that would satisfy the Purpose and Need at less cost, with greater effectiveness, or less environmental or community impact.

The City held five public hearings in December 2008 throughout the study corridor. Both City employees and project consultants were available to answer questions about the Project. Attendees were given the opportunity to make official comments on the Project by providing testimony to the Public Hearing Officer (which was recorded by a court reporter), giving a private statement to a court reporter, or submitting their comments in writing. More information concerning the public hearing process can be found in Chapter 8 of the Final EIS.

In Chapter 2 – Alternatives Considered of the Alternative Analysis Report, November 2007, as well as in Chapter 2 – Alternatives Considered of the Final EIS, two options were considered for the Managed Lane Alternative—Two-direction and Reversible. This alternative would have provided a two-lane elevated toll facility between Waipahu and Downtown Honolulu, with variable pricing strategies to maintain free-flow speeds for transit and high-occupancy vehicles (HOVs). The Two-direction Option would have served express buses operating in both directions during the entire day. To maintain free-flow speeds in the Two-direction Option, it may have been necessary to charge tolls to manage the number of HOVs using the facility. For the Reversible Option, three-person HOVs would have been allowed to use the facility for free, while single-occupant and two-person HOVs would have had to pay a toll. The Reversible Option was found to be optimal.

The findings are summarized in Chapter 2 of the Final EIS as follows: The Managed Lane Alternative was evaluated for its ability to meet project goals and objectives related to mobility and accessibility, supporting planned growth and economic development, constructability and cost, community and environmental quality, and planning consistency. While this alternative would have reduced congestion on parallel highways, system-wide traffic congestion would have been similar to the No Build Alternative as a result of increased traffic on arterials trying to access the facility. Total islandwide vehicle hours of delay would have increased with the Managed Lane Alternative compared to the No Build Alternative, indicating an increase in system-wide congestion (Table 2-1, Final EIS).

The Managed Lane Alternative would not have supported planned concentrated future population and employment growth because it would not have provided concentrations of transit service that would have served as a nucleus for transit-oriented development. The Managed Lane Alternative would have provided little transit benefit at a high cost. The cost-per-hour of transit-user benefits for the Managed Lane Alternative would have been two to three times higher than that for the Fixed Guideway Alternative. Similar to the Transportation System Management (TSM) Alternative, the Managed Lane Alternative would not have had substantially improved service or access to transit for transit-dependent communities. No funding sources were identified for the Managed Lane Alternative. Toll revenues from the Managed Lanes Alternative would have paid for ongoing operations and maintenance while remaining revenues would have been used to repay debt incurred to construct the system.

The Managed Lane Alternative would have generated the greatest amount of air pollution, required the greatest amount of energy for transportation use, and would have resulted in the largest number of transportation noise impacts of all the alternatives evaluated. On the other hand, because the Managed Lane Alternative would have served a shorter portion of the study corridor, it would have resulted in fewer displacements and would have impacted fewer archaeological, cultural, and historic resources than the Fixed Guideway Alternative. The Managed Lane Alternative would not have affected any farmlands. Visually, the elevated structure would have extended a shorter distance, but it would have been more visually intrusive because its elevated structure, with a typical width of between 36 and 46 feet, would have been much wider than the Fixed Guideway Alternative.

After the Alternatives Analysis phase was completed, several scoping comments were received requesting reconsideration of the Managed Lane Alternative that was considered and rejected during the Alternatives Analysis process. However, because no new information was provided that would have changed the findings of the Alternatives Analysis regarding the Managed Lane Alternative, it was not included in the Draft EIS for further consideration.

Various highway improvements have been considered for Oahu. The State of Hawaii Department of Transportation, which is responsible for the freeway system, has evaluated needs for the freeway system and identified the highway projects that would be most efficient at reducing congestion on Oahu. The projects are listed in Table 2-3 of the EIS and included in the analysis for all project alternatives. Broad islandwide transportation approaches were reviewed by the OahuMPO during the development of the 2030 Oahu Regional Transportation Plan (ORTP). The selection of a fixed guideway transit system began with that planning process.

Existing and future transit populations are not neglected. As stated in Section 1.2 of the Final EIS, 63 percent of Oahu's population and 80 percent of employment are located within the study corridor. By 2030, these distributions will increase to 69 percent and 83 percent, respectively.

Ridership projections for the forecast year of 2030 have been developed using the travel demand model used by the Oahu Metropolitan Planning Organization (OahuMPO), which was calibrated against collected traffic and transit ridership information and then validated against recent counts to be sure it properly represents travel activity in the transportation system (Section 3.2.1 of the Final EIS). An on-board transit survey was completed in December 2005 and January 2006, and the latest socioeconomic information available as of October 2008 was incorporated. Traffic counts were collected in 2005, 2007, and 2008. The OahuMPO model is based on "best practices" for urban travel models in the U.S. and consistent with consultation with the FTA. The model is updated approximately every five years to reflect changes in land use, socioeconomic conditions and transportation network improvements. The model is approved by the OahuMPO Technical Advisory Committee. The model is based upon a set of realistic input assumptions regarding land use and demographic changes between now and 2030 and expected transportation levels-of-service on both the highway and public transit system. Based upon the model and these key input assumptions, approximately 116,000 trips per day are expected to use the rapid transit system on an average weekday in 2030. Since the Draft EIS was published, the travel demand model has been refined by adding an updated air passenger model (which forecasts travel in the corridor related to passengers arriving or departing at Honolulu International Airport), defining more realistic drive access modes (driving alone or car pooling) to project stations and recognizing a more robust off-peak non-home-based direct demand element (trips that do not originate at home) based on travel surveys in Honolulu.

Figures 3-9 and 3-10 in the Final EIS present revised ridership numbers for each fixed guideway station. As shown in Figure 3-9, between 650 and 820 passengers will exit the fixed guideway system at

each station between Kalihi and Iwilei during the a.m. two-hour peak period. In addition, 840 passengers will exit the system at Kakaako during the a.m. two-hour peak period.

Similar alignments following North and South King Streets were evaluated in the Alternatives Analysis phase and would have resulted in less transit use than the Project. While an alignment on South King Street would have served some areas beyond walking distance to project stations, it would not have served several areas of dense development including Chinatown, Downtown, Kakaako, and Ala Moana Center and would have resulted in fewer overall transit-user benefits. The South King Street alignment had low ridership potential and served the fewest number of residences and employment areas of all the alignments studied in the downtown area. In addition, it would not have offered good connections for a future extension to Waikiki. The North King Street alignment was rejected because it impacted a greater number of historical properties and cultural practices, had higher capital costs, greater noise impacts than Dillingham Boulevard, and was inefficient to connect to the Airport or Nimitz Highway near Chinatown. Vineyard Boulevard was ruled out during the screening process because it was located farther from commercial and employment areas.

As noted in Section 2.5.6 of the Final EIS, bus service will be enhanced and the bus network will be modified to coordinate with the fixed guideway system. Some existing bus routes would be altered or eliminated to reduce duplication of services provided by the fixed guideway system. Buses removed from service in the study corridor would be shifted to service in other parts of the island. Future bus routes and frequencies are shown in Appendix D in the Final EIS.

As stated in Chapter 2 of the Final EIS, a park-and-ride facility will be located at Pearl Highlands Station near where the H-1/H-2 Freeways merge. In addition, Central Oahu will be served by enhanced bus service connecting to the fixed guideway at Pearl Highlands. As stated in Chapter 3 of the Final EIS, system improvements, including traffic signal priority, automated vehicle identification, and off-vehicle fare collection, could complement frequent bus service at the East Kapolei, Pearl Highlands, and Ala Moana Center Stations. These bus improvements will reduce travel time and improve intermodal transfers. Bus and fixed guideway departures and arrivals will be coordinated and predictable to minimize transfer time and total trip time.

In addition, Table 3-14 in the Final EIS shows an 18-percent decrease in vehicle hours of delay islandwide with the project versus without. Figure 3-8 shows that there will be transit user-benefits islandwide as a result of the Project, while Figure 3-5 shows benefits for transit-dependent households. Accordingly, Central Oahu and Leeward residents will experience benefits with the fixed guideway alignment from East Kapolei to Ala Moana Center via the Airport.

The effectiveness of rail transit is more closely linked to the population density of an area served than to the total population of an area. As described in Chapter 1 of the Final EIS, the majority of the population on Oahu is located in a narrow corridor, which makes it ideal to support rail transit.

Forecasts indicate that riders who are predicted to use the train are those who will find that it is more beneficial than another transportation alternative. Some fixed guideway riders are those that currently use TheBus or other modes. Forecasts indicate that approximately 40,000 vehicles will be removed from roadways as a result of the Project. Most guideway systems are attractive to automobile users because of the time benefit and the lower stress levels during the ride.

The funding of operating and maintenance costs is described in Chapter 6 of the Final EIS. The City Council's current policy is that between 27 percent and 33 percent of operating costs of the transit system (TheBus, TheHandi-Van, the fixed guideway, etc.) must be recovered from fares collected. Unless that policy is changed, the subsidy will be about 70 percent of the operating cost. In 2030, the

operating cost of the fixed guideway will be about $77 million each year in 2009 dollars (compared to $222 million for TheBus and TheHandi-Van). After applying farebox revenues, the operating cost of the fixed guideway will be about $54 million each year and will be allocated from the City's annual budget as is currently done for all transit services.

The OahuMPO is responsible for coordinating transportation planning on Oahu and is comprised of City and State officials. The ORTP is a long-term vision document that outlines transportation goals, objectives, and policies for Oahu. The ORTP guides future development of the major surface transportation facilities and programs. The ORTP contains roadway improvements planned for the island. These improvements were included in the travel forecasting conducted for the Project. A list of projects is shown in Table 2-3 of the Final EIS. The ORTP includes City and State projects.

The Project addressed in the Draft and Final EISs is the best option among those studied in the Alternatives Analysis phase and approved by the City Council in 2006.

Lastly, the Project is focused exclusively on the construction and implementation of rail transit service, which is evaluated in the EIS. As mentioned in Section 4.19.2 of the Final EIS, transit oriented development (TOD) is expected to occur in project station areas as an indirect effect of the Project. This will change the trend toward urban sprawl and is made possible largely by the fixed guideway's influence on the patterns of growth around the stations and along the route. Planning and zoning around station areas will be conducted and established by the City's Department of Planning and Permitting in compliance with the City's new TOD ordinance (09-004).

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Status :	Initial Action Needed
Creation Date :	2/3/2009
Creator Affiliation :	
First Name :	Joe
Last Name :	Dicken
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Zip Code :	96826
Email :	funktuation@yahoo.com
Telephone :	
Telephone Extension :	
Add to Mailing List :	Standard
Submission Method :	Website
Other Submission Method :	
Submission Date :	02/03/2009

Submission Content/Notes : Fine, build the rail between Farrington highway and Ala Moana center. Now compare the population density between Farrington highway and Kapolei and between Ala Moana center and Hawaii Kai. Then think about it and stop messing around. You are a tool of the developers and polocation. The problem is that these developers will be living for half as long as the people building and using this. Put in on the ground & built it where the people are!!!

The EIS system is inherently flawed.

First, how can you have a discussion with someone when they say something then you respond (like I am doing right now) then they say they took your response into consideration. That is it. That is all you have to do. Now consider how easy that would be if individuals (PB) did not want to present an objective EIS. Is that what the person reading this is supposed to be? Think objectively? Is that what DOT hired you to be? I think not. The process does not evaluate the impact.

Secondly, under no measure can you say that you even attempted to address cumulative impacts. It is so bias and subjective that 1+1+1+1 is not even remotely an appropriate to think about it. Perhaps, if you should start with the premise that it is small remote island in the middle of the biggest ocean in the world, then you'll realize the cumulative impact is enormous. Do you consider where the materials are manufactured? The safety standards in those countries? Are those people making a living wage? Where the fossil fuel comes from to manufacture the raw materials and power the rail? Finally, does is enhance O'ahu's NATURAL environment? . Maybe some of these basic ideas will help your 'cumulative' analysis. When all is done, the rail may be a good thing, but the EIS is a political tool. In the end I hope you the best, but for now it is a sad, mudane example of environmental assessment for the next generation.

DEPARTMENT OF TRANSPORTATION SERVICES

MUFI HANNEMANN
MAYOR

CITY AND COUNTY OF HONOLULU

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WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-334421

Mr. Joe Dicken
2714 Nakookoo Street, #A1
Honolulu, Hawaii 96826

Dear Mr. Dicken:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

As described in Chapter 1 of the Final EIS, one purpose of the Project is to improve access to planned development to support City policy to develop a second urban center. The corridor from Kapolei to UH Manoa (the study corridor) is well suited for the fixed guideway project. In 2000, 63 percent of Oahu's population of 876,200 and 80 percent of its 501,100 jobs were located within the study corridor. By 2030, these distributions will increase to 69 percent of the population and 83 percent of the employment as development continues to be concentrated into the Primary Urban Corridor and Ewa Development Plan areas. As stated in Section 1.3.1 of the Final EIS, 2,036,000, or 73 percent, of the approximately 2,790,000 islandwide daily trips, and 350,000, or 64 percent, of the 544,000 a.m. peak-period work-related trips are currently generated within the study corridor. The study corridor attracts an even higher percentage of islandwide work-related trips with 446,000, or 82 percent, of a.m. peak-period work-related trips having destinations within the study corridor.

The Alternatives Screening Memorandum (DTS 2006a) recognized the visually sensitive areas in Kakaako and Downtown Honolulu, including the Chinatown, Hawaii Capital, and Thomas Square/Academy of Arts Special Design Districts. To minimize impacts on historic resources, visual aesthetics, and surface traffic, the screening process considered 15 combinations of tunnel, at-grade, or elevated alignments between Iwilei and Ward Avenue. Five different alignments through Downtown Honolulu were advanced for further analysis in the Alternatives Analysis, including an at-grade portion along Hotel Street, a tunnel under King Street, and elevated guideways along Nimitz Highway and Queen Street.

The Alternatives Analysis Report (DTS 2006b) evaluated the alignment alternatives based on transportation and overall benefits, environmental and social impacts, and cost considerations. The report found that an at-grade alignment along Hotel Street would require the acquisition of more parcels and potentially affect burial sites than any of the other alternatives considered. The alignment with at-grade operation Downtown and a tunnel through the Capital Historic District, in addition to the environmental effects such as impacts to cultural resources, reduction of street capacity, and property acquisition requirements of the at-grade and tunnel sections, would cost an additional $300 million.

The Project's purpose is "to provide high-capacity rapid transit" in the congested east-west travel corridor (see Section 1.7 of the Final EIS). The need for the Project includes improving corridor mobility and reliability. The at-grade alignment would not meet the Project's Purpose and Need because it could not satisfy the mobility and reliability objectives of the Project (see bullets below). Some of the technical considerations associated with an at-grade versus elevated alignment through Downtown Honolulu include the following:

- ***System Capacity, Speed, and Reliability:*** *The short, 200-foot (or less) blocks in Downtown Honolulu would permanently limit the system to two-car trains to prevent stopped trains from blocking vehicular traffic on cross-streets. Under ideal operational circumstances, the capacity of an at-grade system could reach 4,000 passengers per hour per direction, assuming optimistic five minute headways. Based on travel forecasts, the Project should support approximately 8,000 passengers in the peak hour by 2030. Moreover, the Project can be readily expanded to carry over 25,000 in each direction by reducing the interval between trains (headway) to 90 seconds during the peak period. To reach a comparable system capacity, speed, and reliability, an at-grade alignment would require a fenced, segregated right-of-way that would eliminate all obstacles to the train's passage, such as vehicular, pedestrian, or bicycle crossings. Even with transit signal priority, the at-grade speeds would be slower and less reliable than an elevated guideway. An at-grade system would travel at slower speeds due to the shorter blocks, tight and short radius curves in places within the constrained and congested Downtown street network, the need to obey traffic regulations (e.g., traffic signals), and potential conflicts with other at-grade activity, including cars, bicyclists, and pedestrians. These effects mean longer travel times and far less reliability than a fully grade-separated system. None of these factors affect an elevated rail system. The elevated rail can travel at its own speed any time of the day regardless of weather, traffic or the need to let cross traffic proceed at intersections.*

- ***Mixed-Traffic Conflicts:*** *The planned three-minute headways on the guideway will prevent effective coordination of traffic signals in the delicately balanced signal network in Downtown Honolulu. A three minute cycle of traffic lights would affect traffic flow and capacity of cross-streets. Furthermore, there would be no option to increase the capacity of the rail system by reducing the headway to 90 seconds, which would only exacerbate*

the signalization problem. An at-grade system would require removal of two or more existing traffic lanes on affected streets. This effect is significant and would exacerbate congestion. Congestion would not be isolated to the streets that cross the at-grade alignment but, instead would spread throughout Downtown. The Final EIS shows that the Project's impact on traffic will be isolated and minimal with elevated rail, and in fact will reduce system-wide traffic delay by 18 percent compared to the No Build Alternative (Table 3-14 in the Final EIS). The elevated guideway will require no removal of existing travel lanes, while providing a reliable travel alternative. When traffic slows, or even stops due to congestion or incidents, the elevated rail transit will continue to operate without delay or interruption.

An at-grade light rail system with continuous tracks in-street, would create major impediments to turning movements, many of which would have to be closed to eliminate a crash hazard. Even where turning movements are designed to be accommodated, at-grade systems experience potential collision problems. In addition, mixing at-grade fixed guideway vehicles with cars, bicyclists, and pedestrians presents a much higher potential for conflicts compared to grade-separated conditions. Where pedestrians and automobiles cross the tracks in the street network, particularly in areas of high activity (e.g., station areas or intersections), there is a risk of collisions involving trains that does not exist with an elevated system. There is evidence of crashes between trains and cars and trains and pedestrians on other at-grade systems throughout the country. This potential would be high in the Chinatown and Downtown neighborhoods, where the number of pedestrians is high and the aging population presents a particular risk.

- ***Construction Impacts:*** *Constructing an at-grade rail system could have more effects than an elevated system in a number of ways. The wider and continuous footprint of an at-grade rail system compared to an elevated rail system (which touches the ground only at discrete column foundations, power substations and station accessways) increases the potential of utility conflicts and discovery of sensitive cultural resources. In addition, the extra roadway lanes taken away for the system would result in increased congestion or require that additional businesses or homes be taken to widen the roadway through Downtown. Additionally, the duration of short-term construction impacts to the community and environment with an at-grade system would be greater than with an elevated system. Because of differing construction techniques, more lanes would need to be continuously closed for at-grade construction and the closures would last longer than with elevated construction. This would result in a greater disruption to business and residential access.*

Because it is not feasible for an at-grade system through Downtown to move passengers rapidly and reliably without significant detrimental effects on other transportation system elements (e.g., the highway and pedestrian systems, safety, reliability, etc.), an at-grade system would have a negative system-wide impact that would reduce ridership throughout the system. The at-grade system would not meet the Project's Purpose and Need and, therefore, does not require additional analysis.

The Draft and Final EISs have been prepared according to the processes required by the NEPA and Hawaii Revised Statutes Chapter 343.

Discussion of indirect and cumulative effects of the Project can be found in Section 4.19 of the Final EIS. This section lists the documents where you can find the details of the information used for the

summary. "The CEQ regulation at 40 CFR 1500 et seq. and HRS 343 (HAR 11-200) require an assessment of indirect and cumulative impacts. This section summarizes the assessment of these impacts. For more information on land use impacts associated with TOD, see the Honolulu High-Capacity Transit Corridor Project Land Use Technical Report (RTD 2008b). For more information on study corridor and regional economics, see the Honolulu High-Capacity Transit Corridor Project Economics Technical Report (RTD 2008c)."

In addition, the selected construction contractors will be responsible for supplying materials to the project worksite. Materials will be acquired according to "Buy American" regulations.

As with all fossil fuel, any used to support construction and operation of the Project would be extracted from the earth. The selected transit technology will be electrically powered, industry-standard steel wheel on steel rail powered from a third-rail system. The transit system will obtain electricity from the grid on Oahu and will be a customer of HECO. The transit system will require approximately 17.9 megawatts (MW) of electrical power to operate. This represents 1 percent of the existing combined electrical generating capacity on Oahu by HECO and independent power producers. Renewable sources of electrical generating capacity account for 11 percent of the total electrical generation on the island. HECO is currently soliciting proposals for non-firm renewable-energy generating capacity of up to 100 MW that would be available between 2010 and 2014.

As noted in Section 4.11.3 of the Final EIS, future transportation energy consumption will be reduced by 3 percent as a result of the Project. During the EIS phase, specific information with regard to contractors or material suppliers was not available.

As stated previously, a cumulative impact analysis was conducted to analyze past, present, and reasonably foreseeable future actions. "Federal guidance was used in evaluating the Project's cumulative effects, specifically the CEQ's Considering Cumulative Effects under the National Environmental Policy Act."

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
Creation Date :	11/17/2008
Creator Affiliation :	
First Name :	Dennis
Last Name :	Duarte
Business/Organization :	self
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State :	Hi
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Telephone :	808-845-6004
Telephone Extension :	
Add to Mailing List :	Both
Submission Method :	Website
Other Submission Method :	
Submission Date :	11/17/2008
Submission Content/Notes :	How will our property located on Dillingham Blvd be affected? Are you expecting to condemn some of our property?

DEPARTMENT OF TRANSPORTATION SERVICES

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-330546

Mr. Dennis Duarte
1720 Dillingham Boulevard
Honolulu, Hawaii 96817

Dear Mr. Duarte:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraph addresses your comments regarding the above-referenced submittal:

Along Dillingham Boulevard, the roadway must be widened on the makai side; and there will be partial acquisition of property to accommodate this widening. Please refer to Appendix C of the Final EIS for more information regarding right-of-way needs in the Dillingham Boulevard area. The City has notified all property owners whose property may be impacted by the Project and will continue to be in contact with those owners throughout the right-of-way process.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

298406

E NOA CORPORATION

Operators of E Noa Tours & Waikiki Trolley Tours "The Tour & Trolley People"

RECEIVED
09 FEB 5 P12:35
DIRECTOR'S OFFICE
DEPT OF
TRANSPORTATION SERVICES

February 4, 2009

Mr. Wayne Y. Yoshioka
Department of Transportation Services
City and County of Honolulu
650 South King Street, 3rd Floor
Honolulu, Hawai'i 96813

Dear Mr Yoshioka:

Attached are the Comments of the E Noa Corporation, which operates the Waikîkî Trolley, on the Honolulu High-Capacity Transit Corridor Project Draft Environmental Impact Statement/Section 4(f), Evaluation, dated November 2008.

If you have any questions about our statement, please contact me.

Sincerely,

Tom Dinell
Consultant to E' Noa Coporation

cc: Mr. Ted Matley, FTA Region IX, 201 Mission Street, Suite 1650, San Francisco, CA 94105

Mr. Katsumi Tanaka, Chairman of the Board, E Noa Corporation

Mr. Tom Dinell, Consultant to E Noa

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E NOA CORPORATION
Operators of E Noa Tours & Waikiki Trolley Tours "The Tour & Trolley People"

Comments of the E Noa Corporation
February 4, 2009
on
The Honolulu High-Capacity Transit Corridor Project Draft Environmental Impact Statement/ Section 4(f) Evaluation
dated November 2008

Our comments are restricted to one major area of concern with two facets, namely, participation of private transportation companies in the planning of transit systems and the formulation of public-private partnerships in the operation of such systems. This area of concern is essentially ignored in "The Honolulu High-Capacity Transit Corridor Project Draft Environmental Impact Statement/Section 4(f) Evaluation" (DEIS).

Findings

A search of the EIS document reveals the following:

1. With two exceptions, all references to "buses" are to those operated by City and County under contract to Oahu Transit Sevices (OTS).
2. The only reference to "public-private partnerships" is in section 6.2.3 relating to funding sources for ongoing capital expenditures. It states that the DEIS did not assume any private sources of capital to fund the project, though it noted joint developments or other public-private partnerships might reduce the cost to the City or allow adding of additional elements. (p. 6-6)
3. The only reference to private transportation companies was in reference to station characteristics. It was noted that: "Paratransit vehicles would be accommodated at all stations and, in some cases, space for private tour buses, taxis, and/or special shuttles also would be included." (p. 2-36)

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4. In the section related to the TSM (Transportation System Management) Alternative, which had been rejected in the Alternatives Analysis (2006), it was noted that a few comments in the scoping meetings or the public information sessions had suggested providing "...additional bus service with either school buses or private vehicles". The DEIS concluded that these suggestions were not materially different than those considered as part of the initial TSM alternative and therefore further analysis was not warranted. (p. 2-7&8)

Conclusions Based on Findings

A review of the findings leads to the following conclusions:

1. There is no indication in the DEIS that any consideration has been given to the possibility of private transportation companies that provide regularly scheduled services to the public supplementing the services provide by City and County OTS buses or to the forming of mutually beneficial public-private partnerships with such firms with the exception of dismissing the possibility out of hand as noted in point 4 in Findings above.

2. There is no reference in the DEIS to federal statutory and regulatory authority relating to the participation of private transportation companies in the planning process or to public private partnerships involving such companies or to the protection of private providers of transit from competition from federally assisted transit providers or other similar provisions.

3. There is no recognition in the Draft EIS that a privately owned transportation company exists in Honolulu that provides regularly scheduled transit services to the public or portions thereof, namely E Noa's pink line, yellow line, University of Hawai'i at Mānoa Shuttle, and Mililani Shuttle.

The Legal Framework

The requirement for participation of private providers of public transportation services, which provide regularly scheduled services,

in the planning of transit and similar projects is clearly laid out in federal law, regulations, and circulars.

Of the five purpose clauses set forth in 49USC §5301(f), three of them emphasize the importance of involving private transportation companies:

"(f) General Purposes.--The purposes of this chapter are—
(1) to assist in developing improved mass transportation equipment, facilities, techniques, and methods with the cooperation of public and private mass transportation companies;
(2) to encourage the planning and establishment of areawide urban mass transportation systems needed for economical and desirable urban development with the cooperation of public and private mass transportation companies;
(3) to assist States and local governments and their authorities in financing areawide urban mass transportation systems that are to be operated by public or private mass transportation companies as decided by local needs."

The section of the law relating to "private enterprise participation in metropolitan planning and transportation improvement programs and relationship to other limitations" states that: "(a) Private Enterprise Participation. - A plan or program required by section 5303, 5304, or 5305 of this title shall encourage to the maximum extent feasible the participation of private enterprise. " [49USC §5306(a)]

3. The section of the law relating to public participation requirements states in part that: "Each recipient of a grant shall...(2) develop, in consultation with interested parties, including private transportation providers, a proposed program of projects for activities to be financed...and (6) consider comments and views received, especially those of private transportation providers, in preparing the final program of projects." [49USC §5307(c)(2) and (6)]

4. The General Provisions on Assistance, which state in part that: "Financial assistance provided under this chapter to a State or local governmental authority may be used ....to operate mass transportation equipment or a mass transportation facility in

competition with, or in addition to, transportation services provided by an existing mass transportation company, only if

a. The Secretary of Transportation finds the assistance is essential to a program of projects required under sections 5305-5306 of this title; (and)

b. The Secretary of Transportation finds that the program, to the maximum extent feasible, provides for the participation of the private mass transportation companies. [49USC §5323(a)(1)(A) and (B)]

5. The portion of Federal Transit Administration (FTA) Circular C 9300.1A, Chapter VI, relating to private enterprise, states in part that:

"PRIVATE ENTERPRISE CONCERNS . The concerns of Federal transit law regarding private enterprise focus mainly on including the private sector in participating in local transit programs...and protecting private providers of transit from competition with federally assisted transit providers.

a. Participation by Private Enterprise. Both Federal transit law and joint FHWA/FTA planning regulations (discussed in Appendix A of the circular) impose strong requirements for private as well as public sector participation as transportation programs are developed. Plans and programs required for Federal transit assistance must encourage the participation of private enterprise to the maximum extent feasible.

Federal law recognizes the special concerns of private transportation providers that compete with public mass transit authorities. By law, existing private transportation providers are afforded certain safeguards from competition. Specifically, FTA is prohibited from providing Federal assistance to a governmental body that provides service in competition with, or supplementary to, service currently provided by a private transportation company, unless FTA finds that the local transportation program developed in the planning process provides for participation by private transportation companies to the maximum extent feasible.

Accordingly, Federal transit law and the joint FHWA/FTA planning regulations direct special attention to the concerns of private transit providers in planning and project development. Joint FHWA/FTA planning regulations specifically require that private transit providers, as well as other interested parties, be afforded an adequate opportunity to be involved in the early stages of the plan development and update process."

It should be noted that neither the City and County nor its consultants have included E Noa in the preparation of the Alternatives Analysis. There was no response from the City and County to E Noa's letter of January 7, 2006, outlining the federal requirements and offering to work with the City in the planning process. There was a single meeting of E Noa and Department of Transportation Services officials, initiated by E Noa, on February 27, 2006, at which E Noa described the relevant federal laws, regulations, and circulars relating to public agencies and private providers of transit services, as discussed above, and outlined some of the potential opportunities for public-private partnerships in the area of transit. There was no follow-up by the City and County or its consultants to this initiative on E Noa's part.

Clearly, it is obligatory upon applicants for and recipients of federal funding to avoid damaging private providers of public transportation services financially and otherwise. Even more importantly, the applicants for and recipients of federal transit funding should vigorously look for opportunities to creative cooperative arrangements with private transportation companies that provide regular transit service to residents as well as visitors in order to furnish more comprehensive and cost-effective services to the public.

"Leave All This to Later"

Both the spoken and unspoken attitude of the City and County appear to be to leave all discussions of public-private partnerships with respect to transit services to some future date and to substantially ignore the legal requirements for the participation in the planning process of private transportation carriers providing regularly

scheduled service to the public, such as E Noa, to some future data, if at all.[1]

This "do it later, if at all" approach makes no sense. First of all, the time to include private transportation carriers, providing regularly scheduled service to the public, in the planning process is when the planning is occurring, such as in the preparation of the draft EIS. It is important to note that simply providing a statement at a public information meeting is not the kind of participation envisioned by federal law.

Second, the prior "Alternative Analysis" and the present EIS are the planning documents in which the City and County sets forth its basic approach to providing transportation services in the Honolulu High-Capacity Corridor. If there is no substantive discussion of the potential for developing public-private partnerships with private transportation carriers providing regularly scheduled service to the public in these fundamental planning documents, then the likelihood of such partnerships being considered as essential elements in the planning program, either in the present or the future, is minimal. They might be a nice add-on, but they are not part and parcel of the philosophy underlying the planning of the new transit system.

In Conclusion

"The Honolulu High-Capacity Transit Corridor Project Draft Environmental Impact Statement/Section 4(f) Evaluation" is deficient in the following respects:

1. The failure to include private transportation carriers providing regularly scheduled service to the public in the planning process;

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[1] "Opportunities for public-private partnership to enhance the project that can be delivered with limited public funds" is listed on page S-7 of the Alternatives Analysis as an issue to be resolved later. From the context of the statement, it is not possible to tell whether the Alternatives Analysis is referring to public-private partnerships in relation to construction and/or operation of the rail system, transit oriented development, or reduction of the modal splits by utilizing private transportation companies providing regularly schedules transit services.

2. The failure to recognize the relevance of federal statutes and regulations relating to private transportation carriers providing public service and to public-private partnerships; and

3. The failure to address the possibility of public-private partnership with private transportation carriers providing regularly scheduled service to the public as a means for improving the efficiency and effectiveness of the transportation service proposed for the high density corridor.

We reiterate the willingness of E Noa Corporation, an existing private provider of regularly scheduled public transportation services serving both residents and visitors, to work closely with the City and County of Honolulu and its consultants in the development of a public-private partnership that will contribute significantly to the success of the proposed transit system.

DEPARTMENT OF TRANSPORTATION SERVICES

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June 11, 2010

RT2/09-298466R

Mr. Tom Dinell
E Noa Corporation
P.O. Box 235873
Honolulu, Hawaii 96823

Dear Mr. Dinell:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

In your letter, you raise various issues specifically and generally. Your overarching concern appears to be related to participation of private transportation companies in the planning of transit systems and the formulation of public-private partnerships in the operation of such systems. This letter also addressed the three specific conclusions raised on the last two pages of your letter.

The purpose of the Project is to provide high-capacity rapid transit in the highly congested east-west transportation corridor between Kapolei and UH Manoa, as specified in the Oahu Regional Transportation Plan 2030 (ORTP) (Oahu MPO 2007). See Sections 1.7 and 1.8 of the Final EIS for a full discussion on the purpose and need of the Project. The need for the Project is based on the following goals: Improve corridor mobility, Improve corridor travel reliability, Improve access to planned development to support City policy to develop a second

urban center, and Improve transportation equity. As discussed in Chapter 8 of the Final EIS, the Transportation System Management (TSM) Alternative was evaluated during the Alternatives Analysis process. Additional information was added to Section 2.2.2 of the Final EIS to clarify why this and other alternatives performed poorly and were eliminated from further consideration. In short, the TSM Alternative was developed to evaluate how well a combination of relatively low-cost transit improvements could meet the study area's transportation needs. FTA requires that the TSM Alternative reflect the best that can be done for mobility without constructing a new transit fixed guideway. While the TSM alternative did not specifically look at the use of private transportation carriers, they would have faced the same constraints and inability to meet the Project's Purpose and Need. Bus service was optimized, per FTA guidelines, by increasing service but without building a new fixed guideway for transit, such as a system of dedicated bus lanes. The analysis demonstrated that the Purpose and Need for the Project could not be met through a lower-cost, bus-based alternative, whether or not it included the use of private transportation carriers.

Your quotation from Capital Program: Grant Application Instructions, Circular 9300.1A, October 1, 1998, is incomplete. The complete language from Circular 9300.1A(9)(a) is as follows:

> *Participation by Private Enterprise. Both federal transit law and joint FHWA/FTA planning regulations (discussed in Appendix A of the circular) impose strong requirements for private as well as public sector participation as transportation programs are developed. Plans and programs required for federal transit assistance must encourage the participation of private enterprise to the maximum extent feasible.*
>
> *Federal law recognizes the special concerns of private transportation providers that compete with public mass transit authorities. By law, existing private transportation providers are afforded certain safeguards from competition. Specifically, FTA is prohibited from providing federal assistance to a governmental body that provides service in competition with, or supplementary to, service currently provided by a private transportation company, unless FTA finds that the local transportation program developed in the planning process provides for participation by private transportation companies to the maximum extent feasible.*
>
> *Accordingly, federal transit law and the joint FHWA/FTA planning regulations direct special attention to the concerns of private transit providers in planning and project development. Joint FHWA/FTA planning regulations specifically require that private transit providers, as well as other interested parties, be afforded an adequate opportunity to be involved in the early stages of the plan development and update process. While FTA supports the participation of private transit providers in local mass transportation programs, FTA no longer imposes prescriptive requirements for determining whether a grant applicant has made adequate efforts to integrate private enterprise in its transit program, as explained in the FTA Federal Register Notice "Private Enterprise Participation," of April 26, 1994.*

> *FTA relies on the local planning process, which must comply with rigorous planning and private enterprise requirements, and the joint FHWA/FTA planning regulations. To determine the adequacy of a grant applicant's efforts to incorporate private enterprise in its transit program, FTA monitors compliance with statutory and regulatory private enterprise requirements as part of the annual audits and the triennial reviews under the urbanized area formula program.*

The above section directly addresses the issues you raised in your letter. First, the planning process provides for participation by private transportation companies to the maximum extent feasible. As discussed above, the integration of private enterprise occurs during the local planning process. The FTA recommends that to be more involved in transportation planning or service delivery, private providers should: attend metropolitan planning organization (MPO) meetings, comment on the transportation improvement program (TIP), and participate in the statewide transportation improvement program (STIP). See FTA, Federal Transit Administration Private Enterprise Participation in Transportation Planning and Service Delivery, available at http://www.fta.dot.gov/laws/leg_reg_180.html (viewed Sept. 17, 2009).

Also, as mentioned above, the Alternatives Analysis analyzed the implementation of a bus-only transportation system, which could be run by either public or private transportation providers. This analysis found it would not meet the Purpose and Need of the Project.

The following is a summary of the public participation opportunities provided by the MPO and during development of the TIP and STIP, all of which include a fixed guideway that will serve the H-1 travel corridor.

***MPO**. The Oahu Metropolitan Planning Organization (OahuMPO) updates and revises the ORTP every five years in accordance with federal regulations. It is an essential part of the continuing, cooperative, and comprehensive statewide multimodal transportation planning efforts conducted in Hawaii. It focuses on improving mobility with a series of strategies and programs to address future transportation needs. According to its website (www.oahumpo.org), OahuMPO has developed a Participation Plan to ensure compliance with the Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users (SAFETEA-LU) legislation. Under SAFETEA-LU, metropolitan planning organizations are required to develop a participation plan that documents a process for providing interested parties with reasonable opportunities to be involved in the metropolitan planning process. The Participation Plan includes policies that ensure early and continuing public involvement in transportation planning and decision-making processes of the OahuMPO.*

As discussed in Chapter 1 of the Final EIS, as part of its work to update the ORTP, OahuMPO surveyed Oahu residents about transportation issues in 2004. The ORTP 2030 development was a system planning effort that identified and prioritized the H-1 travel corridor as having the greatest need for improved transit service. Seventy percent of the respondents believed that rail rapid transit should be constructed as a long-term transportation solution. During development of the ORTP 2030 in 2004 and 2005, the need for a fixed guideway system was identified and a range of future transportation scenarios for Oahu were evaluated.

TIP. *TIP describes and prioritizes the surface transportation programs and projects that the OahuMPO has selected for implementation during the program period. The TIP is the adopted list of public transit, highway, bicycle, and pedestrian projects that will receive federal transportation funds in the near future. The TIP covers a period of four years and contains two additional years for information only. A new TIP is adopted every three years. The TIP, as approved by the OahuMPO and governor (or designee), is the Oahu element of the Statewide TIP (STIP). As with the development of the ORTP, discussed above, early public input and public outreach is required and part of the process. See OahuMPO, "What is the Transportation Improvement Program?", available at http://www.oahumpo.org/programs/whatistip.html (visited, May 26, 2010).*

STIP. *The STIP is a four-year program implementation plan that identifies federal, state, and county transportation projects, statewide, that intend to be funded, in part, with federal highway and transit funds. The STIP is reviewed by the Hawaii Department of Transportation (HDOT), governor, Statewide Transportation Advisory Committee, OahuMPO, and the Federal Highways Administration and FTA for major projects involving those federal agencies. Public involvement, review, and comment are a required component of the STIP process. See HDOT, Process for Development of a New STIP, available at http://hawaii.gov/dot/highways/STIP/STIP%20Development%20Schedule%20and%20Revision%20Processes_File%20L.pdf.*

In addition to the above opportunities to be involved in the early stages of the plan development and update process that led to the planning for a fixed guideway that will serve the H-1 travel corridor, the City provided many opportunities to participate in the Project's environmental review process. As discussed in Chapter 8 of the Final EIS, agencies, non-governmental groups, and the public have been engaged throughout the planning process for the Project, as required by federal and state law. NEPA mandates agency and public participation in defining and evaluating the impacts of the project alternatives. The Project has followed SAFETEA-LU guidance for federally funded projects. To reach as many community members as possible, a wide variety of public involvement tools were used throughout the Project. For example, the Project maintains an active Speakers Bureau to provide informational presentations to community groups, agencies, and organizations. A full list of Speakers Bureau presentations is included in Appendix G of the Final EIS. To date, more than 2,500 comments on the Project have been submitted through the website and more than 600 have been received via the telephone information line.

The City started working with the public early on in the planning process. An initial Notice of Intent was published for the Project on December 5, 2005. Three scoping meetings were held in December 2005. The comment period for these scoping meetings ended on January 9, 2006. Another series of scoping meetings was held prior to beginning the Project's Preliminary Engineering (PE)/EIS phase. A Notice of Intent was published on March 15, 2007. Agencies, non-governmental groups, and the public were again given the opportunity to comment on the Project's Purpose and Need alternatives, or other project issues. Three public scoping meetings were held in March and April 2007. Project information was disseminated throughout the study corridor in the form of community updates, participation in Town Hall meetings, and informational displays. Subsequently, a series of five public hearings were held

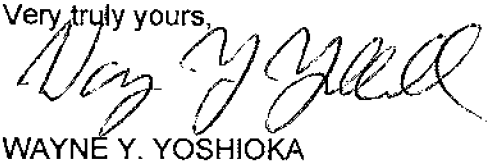
to give interested parties an opportunity to submit comments on the Project and the analysis contained in the Draft EIS. The comments received are addressed in this Final EIS.

Second, the Project recognizes relevant federal statutes and regulations applicable to the Project. As discussed above and in the Final EIS, many opportunities were provided during preparation of the ORTP, TIP, and STIP, which included a fixed guideway that will serve the H-1 travel corridor. In addition, many opportunities were provided for participation in the NEPA environmental review process. The above described processes comply with the federal statutes you cited in your letter; i.e., 49 USC §5301(f), 49 USC §5306(a), 49 USC §5307(c)(2) and (6), and 49 USC §5323(a)(1)(A) and (B). The local and state transportation planning organizations and the Project have encouraged, to the maximum extent feasible, the participation of private enterprise and interested parties through multiple public hearings and meetings, and the use of the project web site to convey information about upcoming contracts and opportunities for private sector involvement. In addition, the City has consulted with private enterprise and interested parties and considered comments and views received in preparing the final EIS for the Project.

Third, although the Draft EIS demonstrates the effectiveness of the Project without specific reference to private transportation carriers, it does not preclude the possibility of public-private partnerships from occurring. Among other things, private transportation carriers may bid on the services to be offered by the Project. In addition, as stated in Section 2.5.6 of the Final EIS, in some cases, there will be room at stations for private tour buses. Section 3.2.6 of the Honolulu High-Capacity Transit Corridor Project Transportation Technical Report references privately owned transportation companies, including the Leeward Oahu Transportation Management Association (LOTMA) and the Mililani Shuttle. In response to your comment, additional references to private operators in Section 3.3.2 of the Final EIS have been added. The text in Section 3.3.2 of the Final EIS now reads: "In addition to public transportation services described previously, various privately owned transportation companies offer transit or ridesharing services to the public, including the Leeward Oahu Transportation Management Association (LOTMA), the Mililani Trolley, and E Noa Corporation. LOTMA provides carpool matching and emergency ride home services in the Ewa and Central Oahu areas. E Noa Corporation operates a variety of services serving the Koko Head and Waianae ends of the corridor with connections to Downtown and tourist centers."

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,



WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
Creation Date :	12/6/2008
Creator Affiliation :	
First Name :	Kathleen
Last Name :	Ebey
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Telephone Extension :	
Add to Mailing List :	Standard
Submission Method :	Website
Other Submission Method :	
Submission Date :	12/06/2008
Submission Content/Notes :	I agree with Councilmember Dijou. A rapid transit from Kapolei to Waipahu will have very little ridership until it is completed to town or beyond. Why ride it to Waipahu and then have to get on a bus to go the rest of the way. Just get on the bus in Kapolei, or continue to drive. However if you start at the "destination" and work backwards, then people start riding it right away. Take a bus or drive to a point and then ride the rapid transit to destination. Makes much more sense. And it also gives tourists an option to get around in the areas they are normally visiting. Tourists certainly aren't going to use it between Kapolei and Waipahu. Also, it gets immediate visibility and can gain immediate support, rather than being in the "boonies" (and I live on the edge of Aiea and Pearl City!!) where nobody sees it or gets to try it out.

DEPARTMENT OF TRANSPORTATION SERVICES

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DEPUTY DIRECTOR

June 11, 2010

RT9/09-331296

Ms. Kathleen Ebey
98-1778 Piki Street
Aiea, Hawaii 96701

Dear Ms. Ebey:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall indentify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

As described in Section 2.5.10, Project Phasing, and further in Section 8.6.9, Construction Phasing, in the Final EIS, to support phased opening, the first construction phase must be connected to a maintenance and storage facility, which requires considerable space. No location has been identified closer to Downtown with sufficient available space to construct a maintenance and storage facility. Therefore, construction will begin between East Kapolei and Leeward Community College. The Project will be constructed in phases to accomplish the following:

- *Match the anticipated schedule for right-of-way acquisition and utility relocations.*
- *Reduce the time that each area will experience traffic and community disturbances.*
- *Allow for multiple construction contracts with smaller contract size to promote more*

competitive bidding.

- *Match the rate of construction to what can be maintained with local workforce and available financial resources.*
- *Balance expenditure of funds to minimize borrowing.*

The portion of the corridor in the Ewa direction of Pearl Highlands is less developed than the areas in the Koko Head direction. Right-of-way can be obtained more quickly at the west end of the Project; therefore, overall project construction can begin earlier, resulting in lower total construction costs. Construction is planned to continue uninterrupted in the Koko Head direction from Pearl Highlands to Aloha Stadium, Kalihi, and finally to Ala Moana Center.

As portions of the Project are completed, each will be opened incrementally so that system benefits, even if limited during the initial phases, will be realized prior to completion of construction of the entire Project.

Lastly, as discussed in Chapter 2 of the Final EIS, park-and-ride lots are planned at East Kapolei, UH West Oahu, Pearl Highlands, and Aloha Stadium. These stations have been identified as having the highest demand for drive-to-transit access.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

February 6, 2008

Mr. Wayne Yoshioka, acting director
Mr. Brennon Morioka, Director
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Honolulu High Capacity Transit Corridor Project
Draft Environmental Impact Statement
Comments

Aloha:

The opportunity to review the environmental impacts of this project is appreciated.

First off let me introduce myself, my educational background is in structural engineering at the UofH, I hold a BS, and MS degree from the department of Civil engineering. I currently work at an engineering firm and am working towards obtaining licensure as a professional engineer. I am involved with several engineering organizations including currently serving in leadership roles as president of the ASCE younger members, and also serving on the board of directors of the Engineers and Architects of Hawaii (EAH). The following comments are my own and should not be associated with my employer or the organizations I am involved in, or anybody else.

I should also mention that I did not have sufficient time to go over the document in detail, these comments are the product of a quick first pass reading of approximately 80% of the document. I trust others will pick up on any details I will miss.

First of all, taking the broad view, this project seems to justify the need for transit based on projected population growth, not needs that exist today. This seems counterintuitive to me, first of all the immediate needs that exist today should take precedence over the needs that are possible in the future. My first question:

1) Why is the project supposed to be starting in the Kapolei end?

It makes more sense to start with constructing the Honolulu end of the project. The justification for my

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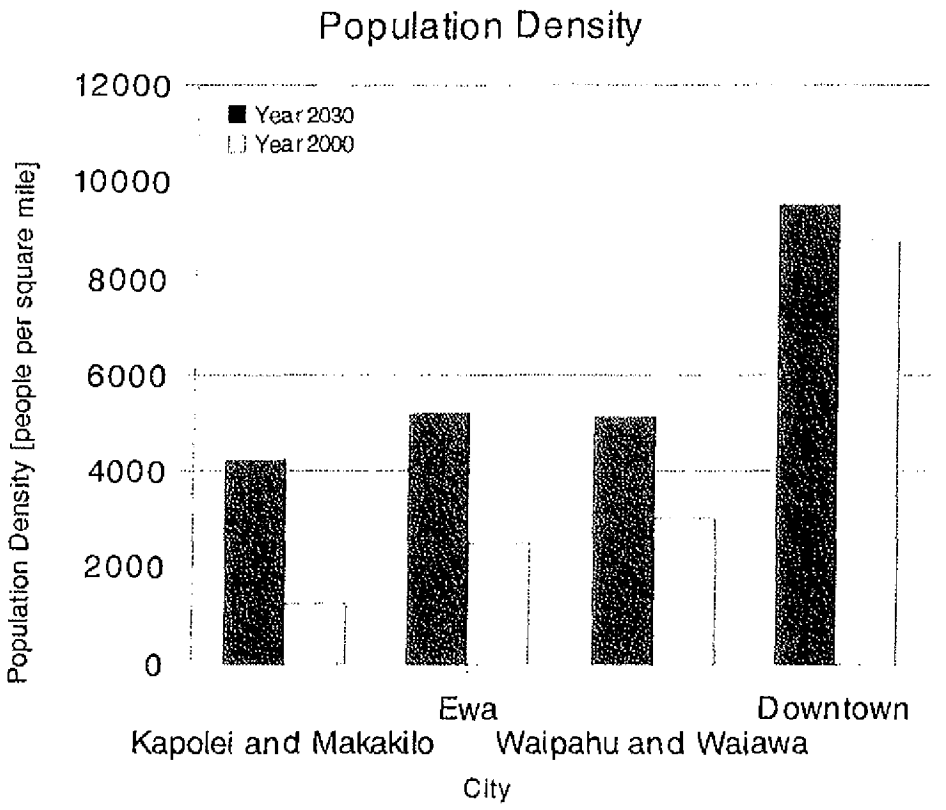
argument is plain to see, given that mass transit works best in high density areas. Downtown has the high density now, even after the 2030 projections, Downtown will still have a substantially higher population density than the Kapolei end of the proposed system, as shown in the bar graph below, produced with data in the EIS:



Another reason for starting in town is that in the unfortunate event that the project goes over budget, or financing falls through and all the phases cannot be completed the maximal benefit to the public would be achieved if the finished part is in Downtown. The greater density of the downtown area will ensure better ridership of an incomplete system, my next question:

Why is population growth as opposed to population density used as the primary criterion for justifying the planning of the system?

And here is a question relating to the source of the 2030 number:
Are the projections of population growth based on data before the economic "crisis" and recession we are currently in? If the current downturn has not been factored in, the projections should be revised accordingly.

Although I did not go over the financial aspect of the report, I suspect that it would be best financially to do the downtown end because construction within the highly developed area will be more expensive. As inflation continues the relentless march on, I expect the earlier we spend the money, the better it will be for the project. To conclude: While I do support the concept of having a rapid transit system in

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Honolulu, the implementation of the system as it is presented in this impact statement has some flaws, the most obvious to me is that this project should start at the town end, there is no question in my mind, the final EIS should be written with that assumption.

One of the other critical things that is not addressed sufficiently in the EIS is the changes in land use that are direct and implied. What I see is a lot of agricultural land being developed and this action is just dismissed. The final EIS should include consideration of the loss of agricultural land indirect to this project. That is the land lost due to developments that this rail system supports. Looking at figure 2-5 on page 2-15 the initial line of this system is all farm fields ! I believe that we should tread lightly there and endeavor to preserve land that can be productive agriculturally to be used for that purpose. Some of this land even has a special classification to recognize how good it is. The land is conferred with the impressive title of being "Prime", "Special", or "Unique". Land in Hawaii is a finite resource, the proposed rail route permanently changes the use of 88 acres of land to non-agricultural and the report calls this insignificant. I believe that absolutely any piece of agricultural land that is converted to a non agricultural use is a very serious matter and should not be taken lightly. The cavalier attitude to developing agricultural land troubles me deeply, our own Governor Linda Lingle makes good arguments (quoting a .gov website):

> "Hawai`i produces only 15 percent of its own food. That's not acceptable and shouldn't be for the State. We need to take action now to increase food self-sufficiency for Hawai`i and preserve and strengthen the agriculture industry for future generations.
>
> We must increase our efforts to protect the best agricultural lands from development and preserve them for agriculture into the future and we must strengthen our commitment to p providing infrastructure and water for agriculture. Increasing our food self-sufficiency will contribute to our own communities rather than sending our dollars out of the State for imported food."

Again, any reduction of agricultural land is counter to our state's goals and great lengths should be taken to avoid such an action. The quick dismissal of the significance of the agricultural land involved in this project cannot be in the final version of the EIS, and mitigating measures must carefully be considered for all the agricultural land affected either directly or indirectly.

The claim is made that "all of the affected properties designated as prime, unique, or of statewide importance and/or actively being farmed are owned by individuals, corporations, or agencies that plan to develop them in conformance with the Ewa Development Plan (DPP 2000)". However, on the DPP's website for the Ewa Development Plan, the first sentence is "The Plan protects prime agricultural lands". This discrepancy must be corrected in the final version of the EIS. I would like the following loaded question addressed in completely in the final version of the EIS:

It is not acceptable to use prime agricultural land as a site for a maintenance and storage facility when a clear alternative is present.

Is this transit system being built to benefit the people of the island to help the congestion problem or is it a tool for the owners of the undeveloped land that is in agricultural use in the right hand side of figure 2-5? I do hope that the latter option is not true, but whoever owns the large tracts along the route stands to profit greatly. Those land owners should be paying the largest share of the construction cost of the

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rail system. From what I gather this is not the case. I have been taught that while serving the public, the image of corruption should be avoided as much as corruption itself, The final EIS should leave it's readers absolutely no doubt as to who the beneficiaries of the project are. (it should benefit ALL of the people on Oahu) I don't want people living in areas on the island removed from the rail system footing the bill for an improvement that serves primarily to make large landowners richer.

If as a last resort, the rail line must fly over agricultural land, especially land classified as prime, unique, or statewide important, I suggest that the land underneath the line be allowed to remain cultivated, the rail above could obtain an easement on the agricultural land instead of condemning it outright and changing its use. Thus the only land that would be made useless for agriculture is that occupied by the piers supporting the rail. Further mitigating measures would have to be taken due to the effect of shading, and the area of the piers, but at least the impact would be minimized.

Another mitigating measure that should be considered is a change in the route shown on figure 2-5. It appears that there is more development down on the 'Ewa side of the page (lower right) The final EIS should seriously consider turning down Fort Weaver Road and continuing down to the bottom of the page ending up near Geiger Road an extension out to Kapolei could be added later This would keep the agricultural areas untouched while serving an area that is already developed.

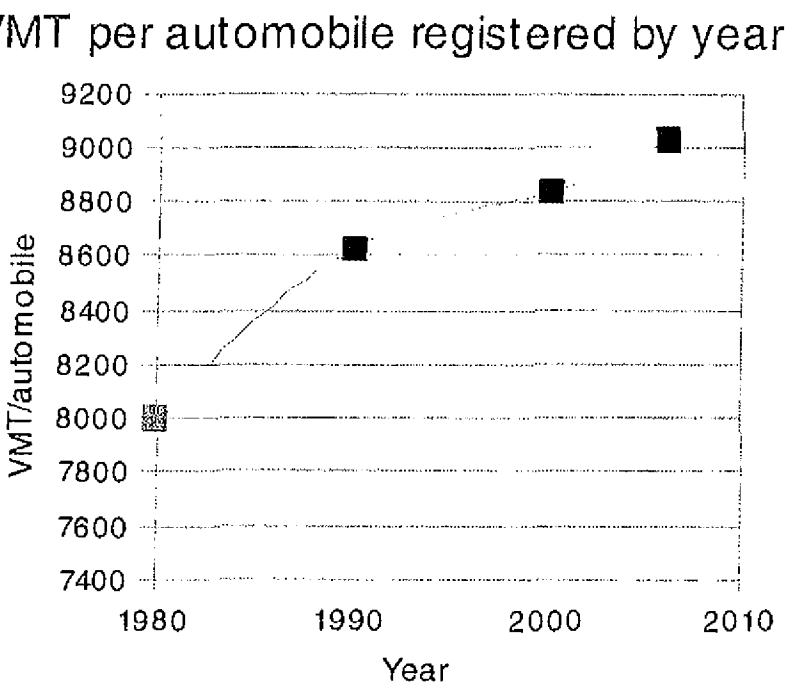
On page 1-1, in the first column under section 1.1.1, The wording implies that the OR&L was a passenger system serving the 'Ewa plain. This is a bit misleading, as far as I know the OR&L was primarily used for transport of Agricultural goods, with primary cargos being cane, pineapple, trash, and oil. Passenger service was not the primary purpose of that line Here is my question:

Can you please state accurately what kinds of things were carried on the OR&L, and expand on the history of the OR&L a bit to avoid misrepresenting the history?

And another one comes to mind:

Why can't a rail system conecting parts of our island carry light cargo when passenger traffic is light (at night)? This would keep a few trucks off the road, and would curb emissions a bit. The planners of the rail system should give serious consideration to carrying a more diverse cargo to get the most benefit from the system, and the conclusions of that consideration should be included in the finalized version of the EIS document

On page 1-2 a graph is shown indicating population, vehicle registrations, and vehicle miles traveled with respect to time. When reviewing this graph, I noticed a disturbing trend that indicates a problem with the way development on Oahu has taken place. Since I am too young to have had a say in the decisions to create the "second city" of Kapolei, I will make a slight digression to state that the "second city" concept seems like a terrible idea for many reasons that I may touch on in reviewing the impact of the proposed rail system. Getting back to figure 1-2, using the same data, but presenting Vehicle Miles Travelled (VMT) per registered vehicle vs. time, a clear trend towards longer drives can be seen. If VMT is plotted per person, a similar trend exists. Please take a look at the graph below:



The trend towards more driving per person is an indicator of fundamental problems in our planning. So another question, that has far reaching implications comes to mind:

Will the proposed rail system increase VMT per capita by supporting more development in Kapolei, thus more people with cars with long commutes, or will the system decrease VMT per capita by providing alternatives to driving?

Looking at Figure 2-7, it appears that the sharp curves leading into the airport would substantially slow the system down:

Has consideration been made to reconfiguring the commuter terminal of the airport to allow a more streamlined rail route at that location?

On the first column of page 3-2 in 3.1.1 The modeling approach is "proven effective" I would like to see some back up given, and a estimated margin of error presented with the model's results. This error should be based on modeling existing systems and changes to them, and comparing the model's conclusions with actual measured data.

On page 3-7 under TheBoat Service heading, the second paragraph describes shuttle sustem to get TheBoat patrons onto other modes in the public transportation. I would imagine a similar system of supporting shuttles would be devised for the proposed rail transit. This supporting shuttle system and revisions to the bus schedules to accommodate the rail system should be a part of the final EIS and should be evaluated in the same level of detail as the rest of the system.

The data presented in figure 3-1 shows a decrease in average bus travelling speeds, and is attributed to

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increased traffic congestion, I would like to know if any of the trend is associated with changes in the bus schedule and routes. If the bus has relatively more peak time runs in the city now and more runs in off peak time and in the less travelled areas in the past, that would also contribute to the trend. I would like this explored and presented in the final EIS, with summary of all the factors and their respective contributions that might cause the trend shown.

In section 3.4.2, effects on Transit. The supporting calculations and data are not presented. Along with any projected information, the assumptions going into the models should be clearly stated, this seems to be a problem typical to the entire document.

I would like the final EIS to consider the possibility of express routes that do not stop at all stations. If all the trains skipped every other station and were staggered such that all the stations were serviced, could a faster travel time on the one track be achieved?

On page 4-4, under 4.2 it is stated that the project is not expected to result in substantial adverse affects on property tax revenue, however a couple lines above, a 1.2 million reduction in tax revenue is mentioned. First of all, I assume the 1.2 Million is an annual number, is that correct? I am not a poor man, however 1.2 Million, although pale in comparison to the costs in this project, it a very significant number to me. I would like the final EIS to state a mitigating measure to account for this loss of revenue. I suggest for a mitigating measure: re-zoning already developed areas along the route to a higher density to make up the deficit in property tax.

The proposed mitigation options to the impacts to Community Services and Facilities outlined in section 4.4 should be described in detail on a case by case basis, not enough detail is given in the draft.

It is stated that development and re-development along the project as well as scale of the transit system would not have substantial effect on community character - this statement is false, and should be omitted in the final version. The scale of the transit often dwarfs surrounding architecture, and would certainly alter neighbothoods in potentially positive and negative ways. These effects shold be explored and reported in the final version of the EIS

Regional pollutant emissions are supposed to be reduced between 3.2 and 4.0 percent Because these numbers are not presented with margins of error, I am led to question the rigor of your calculations. In the final EIS the numbers should be presented with margins of error and a probabilistic analysis should he undertaken to get a better understanding of the chances of the expected performance of the system. For instance, what life cycle of the system's various components is assumed in your calculation? are the emissions associated with material acquisition, manufacture, transport, construction, and maintainence of the entire system, and the no-build options considered in the calculation? If there is no consideration of these factors in a life cycle analysis type of calculation, there should be. Otherwise, present your assumptions and calculations in the final report. Looking only at tailpipe emissions for the two in place systems could lead to faulty conclusions.

In section 4.9, vibration is said to have no impacts. I have done some assessments of vibrations on structures in my professional function, and based on my personal experience I do believe that with appropriate measures there is probably going to be no damage and everybody will be fine. However the perception of neighboring tenants and owners will be that the new train is eausing every bit of damage to their properties. The EIS should consider this hypersensitivity to vibration that will be caused by the installation of the new system, and should outline a plan to do thorough pre-construction surveys of the adjoining properties to avoid having the repair bills for unrelated damage sent to the government.

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My comments relating to the emissions calculations also apply to the energy, provide margins of error, probabilistic analysis, life cycle assessments, and energy associated with material procurement, manufacture, transport, etc.

On page 4-9 under the summary of section 4.14, proposed Mitigation Measures, strike "or" and replace with "and". The world needs more trees.

On page 4-13 under "Farmlands" it is noted the much of the 'Ewa plain is classified as farmland and prime agricultural land. How is it expected to have the required population density to support transit stations there? There should be no stations planned on farm land, it does not make sense.

Page 4-20 under Mitigation it is stated that the effects on different types of land uses in the study corridor would be minimal. This is false, building a stations in the middle of a piece of Agricultural land will catalyze the change in use of the land in the general area from agricultural to something non-agricultural. This effect would be anything but minimal and is against our state's goal of improving food self sufficiency Mitigation of this must be described in detail in the final version.

Figure 4-7 on page 4-21 does not show the full extent of the actively farmed land in the hatched area, a closer look should be taken at the aerial photograph underlay, it can be seen that the cultivated land extends significantly beyond the boundaries shown. If this error is carried into the calculations, they should also be corrected.

On page 4-27 near the end of the "Methodology" text block, it is mentioned that calculations are based on average persons per household and that displaced employees is based on a similarly rough number. In the final EIS, a census should be conducted to get the actual definite number, go knock on some doors and talk with the people to determine how many are there.

Table 4-5 on page 4-26 should include parcel acquisitions, partial and full by land use.

On page 4-26 it is stated that existing land uses would not change, a large portion of the system is based on the assumptions that land use WILL change. All occurrences of this discrepancy should be corrected in the final version of the EIS.

On page 4-28 the land in 'Ewa is described as rural and agricultural, this does not justify starting construction of a mass transit system out there. Transit serves population density, start the line downtown, set aside space for it in Ewa just in case it is needed. Building the line where there is no dense development does not make sense

On page 4-33 there is a typo on the third line under the Cemeteries heading, please fix it for the final version

On page 4-55 It states that income determinations cannot be made - this is a false statement, The authors could conduct their own census. This should be done for the final EIS

On page 4-55 the the middle column in the left side describes a community that embodies many of our cultural ideals inclusing family cohesion, sense of community, local food production, etc. great care should be taken to preserve this, the group should be kept together and if they are relocated, it should be to such a place where they will be able to practice a subsistence lifestyle similar to what the currently enjoy. Any relocation should be of the group as a whole and should be to a place that has

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potential for high agricultural production and a similar proximity to the other communities.

In table 4-10, the word "Dominant" is used in 4 separate occasions, and the word "prominent" is used on three other occasions. The system design should fit in a bit better, so such strong words don't need to be used.

In the doctored photos marked SIMULATION, Power lines and street lights are shown adjacent to the fixed guideway. I would like to see utility transmission conduits incorporated on the fixed guideway and street lights mounted to the guideway wherever possible. The installation of the rail system should include removal of power poles and light poles and overhead power lines wherever possible, this would lessen the visual clutter experienced by citizens that look skyward and would make the elevated structure appear more like it belongs there.

In figure 4-19 the streetlight shown would cast a dark shadow under the fixed guideway in the configuration shown, mount some lights on the bottom side of it instead and remove the high light.

In Figure 4-24 consider planting some trees in the median between the gigantic posts

The caption for figure 4-25 states that the guideway as shown would not noticeably conflict with the view's character - I disagree with this statement.

The caption for figure 4-25 states that the existing trees would soften the effect. This is false, the picture clearly show existing trees on the left side of the figure being removed, I suggest planting new things on the median to soften the effect.

Figure 4-29 This view is quite ugly it would look much nicer at grade or underground... also the reflection in the water is not true to life, the building's reflection would obstruct that of the station.

Figure 4-36 - I feel sorry for the people living in the top floor of that building...I suspect the beam element supporting the fixed guideway, it appears that the beam's section should be deeper, has a preliminary structural analysis been done to establish that the member shown is realistic. Also, the straddle bents could be done in a more architecturally pleasing way.

Page 4-93 add to the points under mitigation:
*Relocate visible utilities onto the fixed guideway structure whenever possible to mitigate visual clutter caused by all of the things above driver's and pedestrian's heads
* Design an architecturally interesting cast column that is appropriate to the surroundings (the plain round one is ugly)
* Colored concrete should be considered for all elements.
* Employ post-tensioned concrete columns or steel columns as opposed to the conventional ones shown to minimize member size and mitigate the visual impact of the columns on the surrounding landscape.

On page 4-99 in the first column near the top of the page it is stated that geologic strata underlying the track is a factor in vibrations transferred to adjacent buildings. Does this statement hold true for elevated systems such as the proposed one?

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The DEIS states that the proposed Build Alternatives will have no effect on endangered and protected waterbirds despite the fact that waterbird habitats exist within the project boundaries. The justification for this claim given in the DEIS is that

"Over time, the waterbirds would adjust to new structures built for the Project since the wetlands would remain intact. This is expected because the waterbirds have continued to occupy the wetlands after the construction of nearby buildings and overhead utilities and the construction or widening of adjacent roads or highways."

Have any studies been conducted that investigate the environmental impacts of development on endangered waterbirds and protected waterbirds and their habitats? If so, please provide sources for each study and state whether or not the study findings support the DEIS claim that there will be no effects. Did the previous construction activities (construction of nearby buildings and overhead utilities and the construction or widening of adjacent roads or highways) result in noise intensity and duration, site disturbance, and all other environmental impacts to the endangered waterbirds' and protected waterbirds' habitat equivalent to each of the proposed Build Alternatives? If so, please provide evidence that supports this claim. Was the proximity from previous construction activity to wetlands and/or endangered waterbird and protected waterbird habitat the same as the proximity from the proposed construction activity to the wetlands and/or endangered waterbird and protected waterbird habitat? Will the noise in the areas where endangered waterbirds were observed remain the same after any of the proposed Build Alternatives are complete and operational? If not, the environmental impacts of noise on endangered waterbird and protected waterbird habitat must be investigated in any final EIS and mitigating measures must be provided.

What is the accuracy of the each field survey conducted and bird point counts? What is the margin of error? If accuracy cannot be guaranteed, a potential for environmental impacts to endangered terrestrial fauna exists. These impacts must be identified in any final EIS, and measures to mitigate these impacts must be included in any final EIS.

Are the "numerous canopy trees" in the Tern habitat enough to support the existing and future white tern population? What is the basis of the claim in the DEIS that the other large canopy trees in urban Honolulu will result in no impact to the white tern population? Please provide sources to substantiate this claim.

How were field surveys conducted? The DEIS explains the procedure for conducting point counts but not field surveys. Any final EIS must include the procedure followed for conducting field surveys.

Why was 8 minutes the duration used for point counts? Please provide a justification for the use of this time interval. One study found that on average 55% of all initial species detections occurred within the first 5 minutes, and 82% of all initial species detections occurred within the first 10 minutes, of 15-minute long point counts regardless of time of day or use of aural stimuli. If the results of this study hold true for Hawaii, only about a 75% of all species were detected over the 8-minute period. Were single or multiple visits conducted? Bartlet, et al. (1999) recommended two visits.

What time of day were point counts conducted and was any aural stimuli used

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The results of the Water Quality Impact Assessment for the EPA must be included in any final EIS and the public must have an opportunity to comment on this study.

What permanent BMPs will be implemented to ensure there is no change in the amount of infiltration? An increase in infiltration relative to existing conditions can have positive environmental impacts. Have any studies been conducted to determine if this is feasible?

The DEIS states that because the Project would rely on electric propulsion, minimal pollutants would be generated on the guideway relative to pollutants generated by roadway traffic. Has a study been conducted that confirms this assumption? If so, please provide a source.

The DEIS does not acknowledge the fact that floodplains provide ecological benefits beyond groundwater recharge and infiltration, including but not limited to maintenance of biodiversity and fish habitats. In fact, the DEIS states the contrary by saying "the only beneficial functions for the floodplains analyzed in the study corridor are the recharge of groundwater and drainage conveyance". Please provide evidence to support this claim.

It is my understanding that the foundations for the proposed structure are expected to be large diameter drilled shafts, in some cases very deep, on the order of hundreds of feet. The final EIS should present study on the effects of the drilling and installation of such foundations on the groundwater system. Also The large volume of earth moved to create the foundation needs to go somewhere, this impact should also be assessed in the final EIS.

The DEIS lists a number of ways the volume of hazardous materials used and extent of worker exposure *could* be limited as a means for mitigation. This list of mitigating measures *must* be implemented in order to adequately mitigate environmental impacts of hazardous waste.

Will this project be built to a LEED™ standard?

What measures will be taken to avoid corrosion?

If ridership turns out to be much lower than forecast, are fees going to be increased? Are taxes going to be raised? What is the forecast for number of riders per day (best estimate, range from low to high)?

Lanes will be taken away during construction. Where are the lane closures and what is the duration of closure? Are there traffic rerouting plans?

What is the amount of carbon dioxide emitted by rail per person-mile when at maximum capacity? How does this compare to a Prius (50 mpg) with a solo driver? What is the maximum capacity of the proposed rail system?

How much energy does rail use (in kwh) per person-mile when at maximum capacity? Again, how does this compare to a Prius (50 mpg) with a solo driver?

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Where will the power come from to operate the rail system? Will HECO build a power plant to run the rail? If not, is there enough current base load capacity to operate rail?

Please send your responses to my comments to:

Aaron Erickson

1348 Alewa Drive

Honolulu, HI. 96817

Aloha,

Aaron Erickson

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DEPARTMENT OF TRANSPORTATION SERVICES

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June 11, 2010 RT2/09-299030R

Mr. Aaron Erickson
1348 Alewa Drive
Honolulu, Hawaii 96817

Dear Mr. Erickson:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

As described in Section 2.5.10, Project Phasing, and further in Section 8.6.9, Construction Phasing, in the Final EIS, to support phased opening, the first construction phase must be connected to a maintenance and storage facility, which requires considerable space. No location has been identified closer to Downtown with sufficient available space to construct a maintenance and storage facility. Therefore, construction will begin between East Kapolei and Leeward Community College. The Project will be constructed in phases to accomplish the following:

- *Match the anticipated schedule for right-of-way acquisition and utility relocations.*
- *Reduce the time that each area will experience traffic and community disturbances.*

- *Allow for multiple construction contracts with smaller contract size to promote more competitive bidding.*

- *Match the rate of construction to what can be maintained with local workforce and available financial resources.*

- *Balance expenditure of funds to minimize borrowing.*

The portion of the corridor in the Ewa direction of Pearl Highlands is less developed than the areas in the Koko Head direction. Right-of-way can be obtained more quickly at the west end of the Project; therefore, overall project construction can begin earlier, resulting in lower total construction costs. Construction is planned to continue uninterrupted in the Koko Head direction from Pearl Highlands to Aloha Stadium, Kalihi, and finally to Ala Moana Center.

As portions of the Project are completed, each will be opened incrementally so that system benefits, even if limited during the initial phases, will be realized prior to completion of construction of the entire Project.

The financial plan is balanced for the entire Project so there will not be a situation in which only a portion of the system will be built. If there is a shortfall, additional revenue sources will be considered. Section 6.6 of the Final EIS discusses risks and uncertainties, as well as potential sources to cover shortfalls.

Neither population growth nor population density was the primary criterion for planning the system; however, the effectiveness of rail transit is closely linked to the population density of the area served than to the total population of an area. As described in Chapter 1 of the Final EIS, the majority of the population on Oahu is located in a narrow corridor, which makes it ideal to support rail transit. The purpose of the Project is discussed in Section 1.7 and the need for the Project is discussed in Section 1.8 of the Final EIS.

Regarding the source of the 2030 number, the projections on population growth were prepared in 2007 by the Oahu Metropolitan Transportation Organization (OahuMPO) for the Oahu Regional Transportation Plan. These projections predate the current economic recession. It is not anticipated that the OahuMPO will update its projections to reflect current conditions in time for inclusion in the Final EIS. The limits of the analysis have been disclosed.

Your letter also had some comments regarding land use. The Ewa Development Plan strives to designate some areas for dense development while preserving other areas for agriculture. Many of the acres for the Project considered prime, unique, or of statewide importance are located at the Hoopili site, which is one of two sites proposed for a maintenance and storage facility. The site designated as the preferred alternative is near Leeward Community College and was formerly used for Navy fuel drumming operations. Discussions are ongoing with the Navy to acquire it. If the Project can acquire this site, the impact on agricultural lands on Oahu will be much less than is described in the Draft and Final EISs.

Your comments regarding agricultural land have been noted. However, as shown in Section 4.2, Land Use of the Final EIS, the Natural Resources Conservation Service has completed a farmland conversion impact rating for the Project and determined that the site need

not be given further consideration for protection and that no additional sites need to be evaluated.

Your letter also had a question as to the goals of this Project. Table 1-4 of the Final EIS lists the following project goals: improve corridor mobility, improve corridor travel reliability, improve access to planned development to support City policy to develop a second urban center, and improve transportation equity. The Project will benefit a majority of the residents and employees of Honolulu, as noted in Chapter 1 of the Final EIS, including future residents in the growing areas on the Ewa Plain. While developers may also benefit from the guideway being located within their project areas, the island as a whole gains by having future development concentrate around station areas as opposed to the present sprawl that ultimately costs everybody more.

Regarding your comment about land underneath the guideway, the guideway structure requires access for inspection and maintenance; however, aside from a small area directly under the structure, the Project will not convert land use along the alignment.

In addition, your comment about changing the route near the Ewa end of the Project has been noted. A Fort Weaver Road alignment was evaluated and rejected in the Alternatives Analysis. It would have been the most expensive option for serving the Ewa area, and no space would have been available to provide park-and-ride and bus transfer facilities.

The OR&L provided freight and passenger service. Chapter 1 of the Final EIS has been revised to reflect this.

Regarding your comment about possibly using the system for courier services, courier-type use of the system is possible. The difficulties with loading and unloading of cargo from the elevated passenger platforms and trains preclude the use for heavy cargo operations.

Your next question was about vehicle miles traveled (VMT) capacity. As shown in Table 3-14 in the Final EIS, VMT will decrease 4 percent islandwide as a result of the Project when compared to the 2030 No Build Alternative.

The route shown in Figure 2-7 meets Project Design Guidelines. The DTS Rapid Transit Division is working with the airport to coordinate the Project with the airport's planned improvements to the commuter terminal.

To address your question about page 3-2 of the Draft EIS, the travel forecasting techniques used for the Project are detailed in the Travel Demand Forecasting Results and Uncertainties Report and the Model Development, Calibration, and Validation Report. All future forecasting has an element of uncertainty associated with it. In the case of the Project, the anticipated limits for guideway ridership in 2030 is expected to be between 105,000 to 130,000 trips per day, bracketing the official forecast of 116,000 riders a day used for all calculations. Even at the low end of the range, the Project meets FTA requirements for cost-effectiveness. Before it is used in forecasting, the model is calibrated against empirically collected traffic and transit ridership information and then validated against current counts to be sure it properly represents the travel activity in the transportation system. Sensitivity tests (e.g., changing highway speeds or transit fares) are performed to ensure the results are stable and predictable within reasonable expectations of consistency.

Regarding your comment about TheBus system, information on existing and future bus routes, including route numbers and frequency, is provided in Appendix D of the Final EIS. These routes include feeder bus service for the fixed guideway system. The revised bus system was incorporated into 2030 modeling projections.

In response to your next point, the average operating speeds for TheBus (1984-2007) reflect a variety of factors, such as bus route configurations and operating characteristics. However, another major contributing factor is the overall condition of Honolulu traffic in which the buses have been operating. The decline in bus traveling speeds would be worse if not for adjustments made by DTS and Oahu Transit Services (operator of TheBus). New routes have been introduced, including CountryExpress! Routes C and E, CityExpress! Routes A and B, and Route 1L. These routes provide limited-stop service, and many of them operate on the H-1 Freeway for a portion of their route. Other routes, such as Routes 11, 43, and 52, have been routed onto the H-1 and H-2 Freeways to bypass local traffic on Kamehameha Highway. All these routes provide all-day, seven-day-a-week service. Urban trips have been cut from the system and suburban trips have been added. Schedule performance is monitored and evaluated constantly. TheBus reported a minor increase in speed in FY 2008. This increase from 13.23 miles per hour in FY 2007 to 13.28 miles per hour in FY 2008 is partly attributable to the higher gasoline prices recorded in the later half of the fiscal year when prices were more than $4.00 per gallon. These higher gasoline prices resulted in lower traffic volumes and less congestion and delay for transit. Since gasoline prices have declined, traffic volumes have increased on roadways with a corresponding impact on speeds.

The Draft and Final EISs are a summary of more detailed technical reports prepared for each discipline covered in the document, including for Section 3.4.2 of the Draft and Final EISs. The information about travel speed, reliability, access, transfers, comfort and convenience, and user benefits is discussed in more detail in the Transportation Technical Report (RTD 2008a), Addendum 02 to the Transportation Technical Report (RTD 2009), Travel Forecasting Results and Uncertainties Report (RTD 2009), and the Model Development, Calibration, and Validation Report (RTD 2009f). These reports are available at libraries, City and County of Honolulu offices, and on the project website at www.honolulutraffic.org.

The Project has analyzed express service; however, such service would not provide substantially improved travel times for most users and could be a source of confusion for some riders. Trains will operate every three minutes in each direction during peak periods and will take 42 minutes to travel from East Kapolei to Ala Moana Center. The planned operation will accommodate future demand projected for the Project.

The reference in Chapter 4 to the $1.2 million loss in tax revenue will be more than offset by growth in the corridor. The number is stated to reflect the fact that portions of properties along the route will be acquired to accommodate the Project, taking them off taxpayer roles. The $1.2 million is a very small portion of the total annual revenue from property taxes. As noted in Section 4.18 of the Draft EIS, based on experience in other cities, the loss will be more than made up by increases in property value as a result of the Project. The City may also decide to follow your suggestion and modify zoning in some areas, but the shortfall will be covered even if that does not occur.

Potential impacts for community services and facilities were presented in Section 4.4.3 of the Draft EIS and Section 4.5.3 of the Final EIS. General mitigation measures are also

presented; individual mitigation measures specific to each parcel will be developed as Final Design progresses.

Aesthetic and visual consequences of the Project are presented in Section 4.8.3 of the Final EIS. Within the urban core neighborhoods of Kalihi-Palama, Downtown, Ala Moana-Kakaako, Waikiki, and McCully-Moiliili, the scale of transit development will not dwarf the surrounding architecture. As the Airport Alternative was selected as the Preferred Alternative for the Final EIS, the fixed guideway will not dwarf the airport facilities. For those neighborhoods in West Oahu (Ewa, Waipahu, Pearl City, and Aiea), the route for the fixed guideway will be within the heavily traveled corridors of Farrington and Kamehameha Highways and will not dwarf these roadways. The scale of development and redevelopment will be consistent with adopted State and Local plans and policies identified in Section 4.2.2 of the Final EIS.

The analysis presented is an operational analysis of the Project's design year, as required by NEPA. It is neither a life-cycle analysis nor a probabilistic analysis. The analysis is a comparative analysis among alternatives. Section 4.9.3 of the Final EIS discusses environmental consequences and mitigation for air quality. This includes updated regional pollutant emissions. For details on these calculations, including margin of error, refer to the Air Quality and Energy Technical Report (2008g) available at libraries, City and County of Honolulu offices, and on the project website at www.honolulutraffic.org.

Pre-construction surveys will be conducted by the contractor in areas where vibration may be present due to construction activities. Section 4.10.3 of the Final EIS states that vibration levels at adjacent properties will not exceed 65 VdB for the elevated rail transit. This level is less than the FTA criterion of 72 VdB for residential buildings and other structures where people normally sleep.

Your next comments on specific pages, figures, and/or tables of the Draft EIS will be addressed paragraph by paragraph in bullets for ease of following:

- *Your comment on Page 4-9 - As stated in Section 4.14 of the Draft EIS, most existing trees along Farrington Highway can be transplanted. In addition to transplanting existing trees, plans for new plantings will be prepared by a landscape architect during Final Design to further mitigate effects to street trees. If new plantings do not offer equitable mitigation (e.g., older mature trees that are removed), additional younger trees will be planted that will, in time, develop similar benefits. Your suggested change will not be made in the Final EIS.*

- *Your comment on Page 4-13 –: As discussed in Chapter 2 of the Final EIS, the East Kapolei Station is located on North-South Road (under construction) near the planned Salvation Army Kroc Center, and approximately 1 mile Koko Head of the UH West Oahu Station. This area of East Kapolei is undergoing development that will be a mixture of residential, recreational, educational, industrial, and commercial land uses. The location of the terminus will support one of the project goals to "improve access to planned development to support City policy to develop a second urban center," as defined in the Ewa Development Plan. As part of this development, the immediate area is also planned for a future Department of Hawaiian Home Lands housing development. Kroc Center, scheduled to open in 2010, will be a 15-acre family support, education, recreation, and cultural arts facility for the general public and will provide services*

for low-income children, seniors, and families. Projected year of opening (2019) ridership shows that the East Kapolei Station will have among the highest boardings in the system.

- *Your comment on Page 4-20: The Ewa Plain has land that is classified as farmland and prime agricultural land. Some of this land has been designated for development in the Ewa Development Plan. Transit-oriented development will occur in these areas and will provide some of the transit riders. Other transit riders will drive or take buses from outlying areas to the stations in the Ewa Plain.*

- *Your comment on Figure 4-7, Designated Agricultural Lands, Kapolei to Fort Weaver Road: The figure was updated in the Final EIS to reflect the location of actively cultivated farmland. The calculations used in the Draft EIS are correct; however, the hatched graphic representation in the figure was updated to match the aerial photography.*

- *Your comment on Page 4-27: The Draft EIS fully discloses the methods used to estimate residential and business displacements. These methods are consistently applied throughout the Draft EIS to evaluate alternatives with one another. The additional cost of performing door-to-door interviews would not change the results of the analysis.*

- *Your comment on Table 4-5: Land uses for each parcel acquisition are provided in Appendix B to the Draft EIS. Updated information on parcel acquisition is shown in Appendix C of the Final EIS.*

- *Your comment on Page 4-46: Section 4.3.3 of the Draft EIS states, "It is assumed that for properties that would be partially acquired, existing land uses would not change." The emphasis is on partial acquisition; the methodology for differentiating "partial" and "full" acquisitions is defined in Section 4.3.1 of the Draft EIS.*

As described in Section 2.5.10, Project Phasing, and further in Section 8.6.9, Construction Phasing, in the Final EIS, to support phased opening, the first construction phase must be connected to a maintenance and storage facility, which requires considerable space. No location has been identified closer to Downtown with sufficient available space to construct a maintenance and storage facility. Therefore, construction will begin between East Kapolei and Leeward Community College. The Project will be constructed in phases to accomplish the following:

- *Match the anticipated schedule for right-of-way acquisition and utility relocations.*

- *Reduce the time that each area will experience traffic and community disturbances.*

- *Allow for multiple construction contracts with smaller contract size to promote more competitive bidding.*

- *Match the rate of construction to what can be maintained with local workforce and available financial resources.*

- *Balance expenditure of funds to minimize borrowing.*

The portion of the corridor in the Ewa direction of Pearl Highlands is less developed than the areas in the Koko Head direction. Right-of-way can be obtained more quickly at the west end of the Project; therefore, overall project construction can begin earlier, resulting in lower total construction costs. Construction is planned to continue uninterrupted in the Koko Head direction from Pearl Highlands to Aloha Stadium, Kalihi, and finally to Ala Moana Center.

As portions of the Project are completed, each will be opened incrementally so that system benefits, even if limited during the initial phases, will be realized prior to completion of construction of the entire Project.

- *Your comment on Page 4-33: Thank you for your comment. Your suggested correction has been noted and the sentence under the "Cemeteries" heading has been revised to state, "One near Aloha Stadium and one near Waimano Home Road are adjacent to the alignment."*

- *Your comments on Page 4-55: As described in Section 4.6.5 of the Draft EIS, income determinations were made for the census tracts and are presented in Table 4-9. Currently, the U.S. Census does not publish data at the census block level. Public outreach described in Section 4.6.4 of the Draft EIS did identify the Banana Patch community even though available data from the U.S. Census and the OahuMPO method did not identify this community as an Environmental Justice population. Adding the individual income determinations would not change the conclusion for the analysis of the Banana Patch community. In addition, an update to the community outreach activities that have occurred since publication of the Draft EIS for the Banana Patch community is presented in Section 4.7.5 of the Final EIS.*

Specific mitigation measures for individual properties that are displaced will be developed on a case-by-case basis as the design progresses and the number and amount of partial and full acquisitions are refined. The City has been coordinating with residents of the Banana Patch community since October 2008. Every household has been visited by City staff, right-of-way staff, and engineering staff to discuss the Project as well as special needs and relocation assistance for residents who will be displaced. At the time the Draft EIS was published, community cohesion was assumed to be a concern of the residents of the Banana Patch. After meeting with the residents of this community, the City learned that the residents were primarily interested in the right-of way process and relocation issues. Therefore, community cohesion was removed from the Final EIS as a concern. The City will continue to work with individual

property owners to provide relocation services. Section 4.4.3 in the Final EIS states, "...to all affected business and residential property owners and tenants without discrimination; persons, businesses, or organizations that are displaced as a result of the Project will be treated fairly and equitably." The Project will follow the requirements of the Federal Uniform Relocation Assistance and Real Property Acquisition Policies Act and the USDOT's implementing regulations of 49 CFR Part 24.

This Act provides for purchase at fair market value and includes relocation assistance to those affected. It also requires that those in need of relocation be placed in comparable quarters.

- *Your comment on Table 4-10: The analysis of visual and aesthetic resources in Section 4.7 of the Draft EIS recognizes that the guideway and stations will noticeably contrast with smaller buildings and that these project elements will be prominent or dominant, depending on context. In addition, views will be blocked and some views will change substantially. Overall, the Project will be set in an urban context where visual change is expected and differences in scales of structures are typical. Project impacts are minimized whenever possible; however, avoidance of all impacts is not always possible. Accurate disclosure of impacts must be discussed in environmental documents. See the visual section of the Final EIS, Section 4.8, as it has been updated and expanded with additional view analysis since the Draft EIS.*

- *Regarding utilities in simulated photos: The open portion of the guideway structure contains tensioning cables and is not available for utilities. In addition, future maintenance access for the utilities would require openings in the structure, which would weaken it. Access would either have to be provided from below with a lift-truck or would require closure of the transit operations from above.*

- *Your comment on Figure 4-19: The streetlight shown is well beyond the area that will be affected by construction of the Project and likely will not be modified.*

- *Your comment on Figure 4-24: Plans for new tree plantings will be prepared by a landscape architect during Final Design. Details can be found in Section 4.15 of the Final EIS.*

- *Your comments on Figure 4-25: Your comment is acknowledged. The caption has been revised to state, "The guideway will be more visible than the highway in the background. It will also noticeably conflict with the views' character."*

- *(Your letter states Figure 25 however the language is on Figure 4-28 of the Draft EIS) Figure 4-28 of the Draft EIS states, "The Kapalama Station and guideway would be dominant features in views along Dillingham Boulevard. The existing trees would soften this effect." The statement has been revised as follows, "...remaining trees will soften this effect." It is true that some existing trees will be removed to build the Project. The Draft EIS states, "effects to trees would be mitigated by transplanting existing trees or planting new ones." Specific sites for relocating trees will be considered during Final Design when plans for*

new plantings will be prepared by a landscape architect. Depending on the specific area and the size and type of existing trees, trees will help soften the guideway structures in some view planes. Details can be found in Section 4.15.3 of the Final EIS.

- *Your comment on Figure 4-29: The Alternatives Screening Memorandum (DTS 2006a) recognized the visually sensitive areas in Kakaako and Downtown Honolulu, including the Chinatown, Hawaii Capital, and Thomas Square/Academy of Arts Special Design Districts. To minimize impacts on historic resources, visual aesthetics, and surface traffic, the screening process considered 15 different combinations of tunnel, at-grade, or elevated alignments between Iwilei and Ward Avenue. Five different alignments through Downtown Honolulu were advanced for further analysis in the Alternatives Analysis, including an at-grade portion along Hotel Street, a tunnel under King Street, and elevated guideways along Nimitz Highway and Queen Street.*

The Alternatives Analysis Report (DTS 2006b) evaluated the alignment alternatives based on transportation and overall benefits, environmental and social impacts, and cost considerations. The report found that an at-grade alignment along Hotel Street would require the acquisition of more parcels and affect more burials than any of the other alternatives considered. The alignment with at-grade operation Downtown and a tunnel through the Capital Historic District, in addition to the environmental effects such as impacts to cultural resources, reduction of street capacity, and property acquisition requirements of the at-grade and tunnel sections, would cost more than $300 million more than the least expensive alternative.

The Project's purpose is "to provide high-capacity rapid transit" in the congested east-west travel corridor. The need for the Project includes improving corridor mobility and reliability. The at-grade alignment would not meet the Project's Purpose and Need because it could not satisfy the mobility and reliability objectives of the Project. Some of the technical considerations associated with an at-grade versus elevated alignment through Downtown Honolulu include the following:

- ***System Capacity, Speed, and Reliability**: The short, 200-foot blocks (or less) in Downtown Honolulu would permanently limit the system to two-car trains to prevent stopped trains from blocking vehicular traffic on cross-streets. Under ideal circumstances, the capacity of an at-grade system could reach 4,000 passengers per hour per direction, assuming optimistic five minute headways. Based on travel forecasts, the Project will need to carry approximately 8,000 passengers by 2030. Moreover, the system can be readily expanded to carry over 25,000 in each direction by reducing the interval between trains (headway) to 90 seconds during the peak period. To preserve a comparable system capacity, speed, and reliability, an at-grade alignment would require a fenced, segregated right-of-way that would eliminate all obstacles to the train's passage, such as vehicular, pedestrian, or bicycle crossings. Even with transit signal priority, the at-grade speeds would be slower and less reliable than an elevated guideway. The at-grade system would travel at slower speeds due to the shorter blocks, tight and short radius curves in places within the constrained and congested Downtown street network, the need to obey traffic regulations (e.g., traffic signals) along with other vehicles, and potential conflicts with other at-*

grade activity such as cars, bicyclists, and pedestrians. These effects mean longer travel times and far less reliability than a fully grade-separated system. None of these factors affect an elevated rail system. The elevated rail can travel at its own speed any time of the day regardless of weather, traffic or the need to let cross traffic proceed at intersections.

- ***Mixed-Traffic Conflicts**: With the planned three-minute headways, the short cycle of traffic lights would affect traffic flow and capacity of cross-streets. Furthermore, there would be no option to increase the capacity of the system by reducing the headway to 90 seconds. An at-grade system would also require removal of two or more existing traffic lanes on affected streets. This effect is significant and would exacerbate congestion for those who choose to drive. Congestion would not be isolated to the streets that cross the at-grade alignment but instead would spread throughout Downtown. The Final EIS shows that the Project's impact on traffic will be isolated and minimal, and in fact will reduce system-wide traffic delay by 18 percent compared to the No Build Alternative (Table 3-14 in the Final EIS). That is because the elevated guideway will require no removal of existing travel lanes, while providing an attractive, reliable travel alternative. When traffic slows, or even stops due to congestion or incidents, the elevated rail transit will continue to operate without delay or interruption.*

  The at-grade light rail, with its continuous tracks in-street will create major impediments to turning movements, many of which would have to be closed to eliminate a serious crash hazard. Even where turning movements are designed to be accommodated, at-grade systems experience significant collision problems. In addition, mixing at-grade fixed guideway vehicles with cars, bicyclists, and pedestrians presents a much higher potential for conflicts compared to grade-separated conditions. Where pedestrian and automobiles cross the tracks in the street network, particularly in areas of high activity (e.g., station areas or intersections), there is a risk of collisions involving trains that does not exist with an elevated system. There is evidence of crashes between trains and cars and trains and pedestrians on other at-grade systems throughout the country. This potential would be especially high in the Chinatown and Downtown neighborhoods, where the number of pedestrians is very high and the aging population presents a particular risk.

- ***Construction Impacts**: Constructing an at-grade rail system could have more effects than an elevated system in a number of ways. The wider and continuous footprint of an at-grade rail system compared to an elevated rail system (which touches the ground only at discrete column foundations, power substations and station accessways) increases the potential of utility conflicts and discovery of sensitive cultural resources. In addition, the extra roadway lanes taken away for the system would result in increased congestion or require that additional businesses or homes be taken to widen the roadway through Downtown. Additionally, the duration of short-term construction impacts to the community and environment with an at-grade system would be considerably greater than with an elevated system. Because of differing construction techniques, more lanes would need to be continuously closed for at-grade construction and the closures would last longer than with elevated construction. This would result in a greater*

disruption to business and residential access.

Because it is not feasible for an at-grade system through Downtown to move passengers rapidly and reliably without significant detrimental effects on other transportation system elements (e.g., the highway and pedestrian systems, safety, reliability, etc.), an at-grade system would have a negative system-wide impact that would reduce ridership throughout the system. The at-grade system would not meet the Project's Purpose and Need and, therefore, does not require additional analysis.

DTS considered your request to revise Figure 4-29. However, it was determined that the simulation presented in the Draft EIS adequately represents the Project. The simulations are primarily intended to represent the scale and spatial relationships of the project elements to other objects.

- *Your comment on Figure 4-36: The structural size depicted is approximately correct based on structural load analysis and will be confirmed during Final Design. As described in the Draft EIS, the simulations show type, size, and location of features, but final finishes have not been determined.*

- *Your comment on Page 4-93: Since providing access for maintenance and repair could affect system reliability, utilities will not be hung from the structure. Structural aesthetic features are still under revision. Tinted concrete is being considered and may be used. Column type will not substantially change column size. Steel supports would result in a mix of materials between support and structure, creating a visual incongruence.*

- *Your comment on Page 4-99: The geologic strata are a factor, but since this is an elevated system, the only contact with the ground is the support columns; therefore, any vibration created by trains is dampened by the support columns and not transmitted into the ground.*

Your letter also contained several comments and questions regarding endangered and protected waterbirds and their habitats. We are not aware of any studies that investigate the impacts of development on waterbirds and their habitats. The Project will not convert waterbird habitat, including wetlands, into transportation facilities. The Project will stay within existing roadway corridors along most of its route; however, some upland sites are planned for a maintenance and storage facility and park-and ride lots, but they are not close to any waterbird habitat.

Although this Project did not monitor the noise intensity, duration, or other environmental impacts associated with construction of existing facilities near waterbird habitat, it is expected that construction of the Project will be similar and comparable to the construction effects of existing facilities, although not equivalent in all aspects at all times. In addition, you are correct that there are virtually no areas along the corridor, in proximity to waterbird habitat, where there has not been major construction of roads, utility lines, bridges, elevated freeways, buildings, and other existing structures.

The standard error, not the margin of error, of the following parameters was presented in the Honolulu High-capacity Transit Corridor Project Ecosystems and Natural Resources

Technical Report (RTD 2008j): The average number of individuals of each species per station and the average number of species per station or average richness for each corridor segment. By providing the standard error of the averages and the sample size, the data provide what is conventionally required in the presentation of averages. From these statistics, one can derive confidence limits for the estimated population parameter, if desired.

The accuracy of these parameters cannot be guaranteed nor do they have to be. The true values of the population parameters will almost always remain unknown, and therefore, it is common to estimate the reliability of the estimated parameter by setting confidence limits to it. There is no way to guarantee that the estimate, such as the average number of zebra doves at each point count station, is accurate. We can only express the degree of confidence in the average as a probability.

Field surveys were observations conducted while walking or driving around. Confidence limits cannot be placed on such observations since the manner in which the observations were conducted do not lend themselves to statistical analyses. However, what we say we saw, not how many, is accurate.

How confident we are in the estimate of population parameters has no bearing on whether there is a potential for environmental impacts, regardless of species. The design of the point counts was to determine what birds were present along the corridor and provide an index of abundance. Field surveys were designed to record what species were observed there.

The Ecosystems and Natural Resources Technical Report (RTD 2008j) states that, "White terns may be directly affected by the Project between Kalihi to University and Waikiki because this species uses mature canopy trees as roosting and nesting sites almost exclusively. These trees could be affected by construction of the fixed guideway system."

VanderWerf (2003) indicates that while the white tern population on Oahu is still relatively small and restricted in range, it is increasing and robust. While white tern habitat is limited to large trees in southeastern Oahu, VanderWerf also indicates that if the population grows, they may move inland to other coasts of the island and to other islands. While not as comprehensive, our tern sightings during observations along the corridor show a similar geographic distribution as VanderWerf found in 2001 to 2003. Therefore, we can state that the tern population on Oahu still has area to expand (Vanderwerf, E.A. 2003. "Distribution, abundance, and breeding biology of white terns on Oahu, Hawaii." Wilson Bull., 115(3):258-262).

The procedures for field surveys were presented in Section 3.12 of the Ecosystems and Natural Resources Technical Report (RTD 2008j), which can be found at the Department of Transportation Services, City and County of Honolulu offices, and on the project website (www.honolulutransit.org).

Scott, et al., (1986) used an eight-minute count period for their variable circular plot method to estimate bird densities in Hawaiian forests. They determined that the interval was long enough to allow an observer to accurately record all birds observed.

The count period was selected as a compromise between efficiency and effectiveness. Point counts by Blondel, et al., (1981) were conducted for 20 minutes, and as the commenter

points out, studies by Dettmers, et al., (1999) (not Bartlet, et al.) indicate that 5- or 10-minute intervals are adequate (Scott. J.M., S. Mountainspring, F.L. Ramsey, C.B. Cameron. 1986. "Forest bird communities of the Hawaiian Islands: Their dynamics, ecology, and conservation." Studies in Avian Biology No. 9, Blondel, J., C. Ferry, and B. Frochot. 1981. "Point counts with unlimited distance." Studies in Avian Biology No. 6:414-420. Cooper Ornithological Society, Dettmers, R., D. A. Buehler, J.G. Bartlett, and N.A. Klaus. 1999. "Influence of point count length and repeated visits on habitat model performance." JWM 63(3):815-823. 1999).

The authors (Dettmers, et al., 1999) did not recommend two visits, but stated that the one visit data did not perform as well in their model. Their quote: "The current point count recommendations also suggest conducting only 1 visit/point, but we found that models developed from 2 visits/point consistently performed somewhat better than single visit models across all count durations and species. We concluded that conducting 2 visits/point will likely result in habitat models that perform better than models developed from a single visit. However, as with count duration, the potential benefits of increased model performance should be weighed against the additional costs in time and resources required to complete extra visits to each point."

Regardless, during the alternative routes analyses, each route was surveyed once via the modified point-count method using eight-minute count periods. After the Preferred Alternative route was selected, this route was re-sampled using the same method giving two samples to determine the presence or absence of species and their relative abundance.

Lastly, point counts were conducted from 7 a.m. to 11 a.m. All birds heard and seen were recorded, and no aural stimuli were used.

The Water Quality Impact Assessment was part of the Water Resources Technical Report (RTD 2008k) and is available to the public on the Technical Report CD-ROM that was part of the Draft EIS, which is available from DTS, on the project website at www.honolulutransit.org or at libraries where the Draft EIS was available for public review. A Water Quality Impact Assessment was reviewed by the U.S. Environmental Protection Agency (EPA). Permanent Best Management Practices (BMPs) will include vegetated swales, retention ponds, and grit removal structures as well as other methods and are discussed in Section 4.18.10 of the Final EIS.

No pollutants will be generated on the guideway as pollutant loading is not typical for electrical propulsion transit (APTA 2003). Due to the power requirements of the guideway, however, emissions will be generated offsite at the power plant. While these emissions have not been quantified, the energy analysis indicates that the Project will require 2 percent less energy than the No Build Alternative. This analysis accounts for both roadway vehicle propulsion energy and light rail transit power requirements. Based on this, it is expected that the total emission burden generated by the Project will be lower than that for the No Build Alternative.

Yes, floodplains can have other functions besides groundwater recharge and infiltration, but in this urban area, these are the major functions. The word "only" was replaced by "major" in the Final EIS.

In addition, the foundations can affect one or both of the groundwater systems on Oahu. Most of the foundations and drilled shafts will be completed in the water table aquifer, which is

generally non-potable and used for irrigation water or industrial uses. The critical groundwater system you are more likely referring to is the Southern Oahu Basal Aquifer, which was designated a Sole Source Aquifer by EPA. In order for a federally-funded project to be built above a designated Sole Source Aquifer, a Ground Water Impact Assessment must be prepared to meet the coordination requirements of Section 1424(e) of the Safe Drinking Water Act. After evaluating the Ground Water Impact Assessment completed for this Project, EPA concurred that the Project should have no significant impacts on groundwater, either during long-term operation of the system or during its construction. The vast majority of the drilled shafts will not penetrate the aquifer, and those that do will only penetrate by a few tens of feet. The shafts will be quickly filled with concrete to seal off any possible route in which contaminants could enter the aquifer. The Ground Water Impact Assessment is available to the public as part of the Water Resources Technical Report (RTD 2008k), which is included on the Technical Report CD-ROM that was part of the Draft EIS. Efforts will be made to either reuse the material removed for the foundations when possible or properly disposed of it at a site permitted by the Hawaii Department of Health.

This list of methods to limit the volume of hazardous materials used and the extent of worker exposure provides examples of how worker exposure will be limited. In addition, the Project will comply with applicable rules and regulations, such as those of the U.S. Occupational Safety and Health Administration and the Hawaii Occupational Safety and Health Division. Workers will be required to comply with material labels.

To address your next comment, there are no Leadership in Energy and Environmental Design (LEED) standards for transit systems. Project buildings, such as the maintenance and storage facility, will be built considering LEED principles.

Regarding corrosion, control measures will be applied to the Project's fixed-steel facilities and neighboring utility structures to provide proper operation over their lifetime. These measures include the following:

- *Protective coating specification for steel aerial structures.*
- *Coating specification for stations.*
- *Preventive measures against stray current corrosion.*
- *Corrosion-control design of transit underground utilities and neighboring utilities owned by others.*

The next concerns in your letter addressed ridership. By City Council's current policy, ridership on the entire transit system is expected to pay for between 27 and 33 percent of the annual operating and maintenance costs. The City Council will adjust the fare to maintain that level of revenue. The balance of the operations costs will be part of the City's annual budget, which includes sources currently used for TheBus: Federal funding and subsidies from the City's General and Highway Funds.

The amount of service provided will be scaled to generally match demand. If the service attracts fewer riders than expected, then less service may be provided by adjusting headways or train length, which would result in lower-than-expected operating and maintenance costs. The

ridership estimate is presented in Section 3.4.2 of the Final EIS. The forecast is that 116,000 people will ride the system every day. The anticipated limits for guideway ridership in 2030 is expected to be between 105,000 to 130,000 trips per day, bracketing the official forecast of 116,000 riders a day used for all calculations. This is very high ridership, which further indicates how badly needed the system is and will be in the future.

You also had a question about lanes being taken away during construction. As discussed in Chapter 3 of the Final EIS, a Maintenance of Traffic (MOT) Plan will identify measures to mitigate temporary construction-related effects on transportation. The contractor will develop the MOT Plan, and it must be approved by the City and/or the Hawaii Department of Transportation. The MOT Plan will address temporary lane closures and duration for streets identified in Table 3-27 of the Final EIS. Rerouting plans will be included in the MOT Plan.

The direct comparison of carbon dioxide emissions between automobiles and transit rail cannot be made without knowing the energy sources providing the electricity. The utility (HECO) that will provide electricity for the Project primarily uses fuel oil to generate electricity, but the HECO grid is supplemented with independent power producers that generate electricity through renewable resources. As noted in Section 4.9.3 of the Final EIS, the Project will result in a daily reduction of 171 metric tons of carbon dioxide when compared to the No Build Alternative. For an at-capacity system, approximately 25 grams of carbon dioxide are emitted per passenger mile. Approximately 150 grams of carbon dioxide are consumed per 1/50th of a gallon of gasoline consumed.

As noted in Section 4.11.1 of the Final EIS, an average rail vehicle consumes 62,700 British thermal unites (BTUs) per vehicle mile of service. A single vehicle has a capacity of approximately 160 passengers. Therefore, approximately 390 BTUs are consumed per passenger mile at capacity. Consumption of 1/50th of a gallon of gasoline consumes 2,500 BTUs.

Lastly, the Project will consume approximately 1 to 2 percent of the total projected electricity generated on Oahu in 2030. The planned electricity generation capacity on Oahu will be sufficient to support the transit system, but the electricity distribution system will require various upgrades to support the system.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

-----Original Message-----
From: Ted.Matley@dot.gov [mailto:Ted.Matley@dot.gov]
Sent: Wednesday, February 04, 2009 2:34 PM
To: Miyamoto, Faith
Subject: FW: Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Project

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From: ernst [mailto:bternst@hawaii.rr.com]
Sent: Wed 2/4/2009 4:32 PM
To: wyoshioka@honolulu.gov; Matley, Ted <FTA>
Subject: Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Project

Dear Mr. Wayne Y. Yoshioka and Mr. Ted Matley:

I am concerned about the transit choice since it appears that "Steel wheels on steel rails" was selected by the Mayor before any meatings were held or any facts collected from each of the manufacturers of other systems.

There are other methods that are quieter and cheaper to build. A few, such as "Maglev" could be built and the savings used for additional miles of track and additional stations for the same overall cost of Steel Wheels on Steel Rails. We need a system that serves the University of Hawaii, the International Airport and communities all the way out to the West coast of Oahu. The system should be built as a single project, with all of the track and stations in one project, and it should be built as quickly as possible rather than a project that takes forever.

You should use monetary incentives in the contracts that reward construction companies for completing projects ahead of schedule.
Conversely, the same companies should be fined for exceeding projected completion dates on specific portions of the project. The construction of the Federal Prison at the Honolulu Airport is a wonderful example of how construction should proceed. It was built quickly and went into operation rapidly.

The draft Environmental Impact Statement for the city's rail transit project is unacceptable because it is written solely for a steel wheel on steel rail system. There are other forms of fixed rail that may be better, quieter and more cost-effective

than steel wheels. Please rewrite this EIS to cover the other technologies, such as monorail and maglev, to ensure that the city will obtain the best transit system and at the best price.

Sincerely,
William L. Ernst
Mililani, Hawaii

AR00001698

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, 3RD FLOOR
HONOLULU, HAWAII 96813
Phone: (808) 768-8305 • Fax: (808) 768-4730 • Internet: www.honolulu.gov

MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT2/09-298943R

Mr. William L. Ernst
bternst@hawaii.rr.com

Dear Mr. Ernst:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraph addresses your comments regarding the above-referenced submittal:

No comparative project has ever been built within the U.S. Therefore, no data is available to support a cost estimate. Some of the savings recognized in other countries for beam-track vehicles would not apply in the U.S. because of requirements to include an emergency egress walkway. Also, the smaller structures proposed in the comment result in shorter span-lengths, which increases the number of columns required and the cost to construct both the additional foundations and columns.

The FTA and DTS appreciate your interest in the Project. The Final EIS has been issued in conjunction with the distribution of this letter. You may view the Final EIS on the Project website at www.honolulutransit.org. You may request a DVD of the Final EIS and additional content through the "Contact Us" tab on the website or by calling the Project hotline at 566-2299. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Status :	Action Pending
Creation Date :	11/3/2008
Creator Affiliation :	
First Name :	William
Last Name :	Estep
Business/Organization :	
Address :	
Apt./Suite No. :	
City :	
State :	HI
Zip Code :	96701
Email :	dijitul@yahoo.com
Telephone :	
Telephone Extension :	
Add to Mailing List :	Email
Submission Method :	*Website*
Other Submission Method :	
Submission Date :	11/03/2008
Submission Content/Notes :	I am a support of rail even though I will rarely use it. It will take time for ridership to reach its peak given the fact that builders and businesses will adjust to having the rail in Honolulu. However, I see no incentives to ride these public transits, including TheBus, even if they are near me. Sure, it is less expensive, but it's not enough to remind people there are *alternative ways of travel.* The City should consider a permit auction or a density compensation fee for new cars arriving in Honolulu. Cars arriving to the islands should be limited or controlled. A limited number of new car permits should be auctioned, and/or fees assessed on each new car sold or arriving in Honolulu. A one-time cost of, say $500 or $1000, to each car brought to the islands would encourage resell of existing cars, reduce future traffic growth, and help encourage those living near the rail systems and bus *systems to use them and dispersing the number of new cars owned by* everyone else.

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

RT8/09-330340

May 21, 2010

Mr. William Estep
dijitul@yahoo.com

Dear Mr. Estep:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraph addresses comments regarding the above-referenced submittal:

Your idea to limit the number of vehicles on Oahu could reduce traffic; however, it is outside the DTS' authority to implement. In addition, limiting the number of vehicles would not meet the Project's stated goals to improve mobility or transportation equity.

The FTA and DTS appreciate your interest in the Project. The Final EIS has been issued in conjunction with the distribution of this letter. You may view the Final EIS on the Project website at www.honolulutransit.org. You may request a DVD of the Final EIS and additional content through the "Contact Us" tab on the website or by calling the Project hotline at 566-2299. Issuance of the Record of Decision under NEPA and acceptance of the Final EIS by the Governor of the State of Hawaii are the next anticipated actions and will conclude the environmental review process for this Project.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Status :	Initial Action Needed
Creation Date :	1/7/2009
Creator Affiliation :	
First Name :	Imoa
Last Name :	Faletogo
Business/Organization :	Good Samaritan Church
Address :	P.O Box 31029
Alternative Preference :	
Apt./Suite No. :	
City :	Honolulu
State :	HI
Zip Code :	96820
Email :	gsc_hawaii@yahoo.com
Telephone :	
Telephone Extension :	
Add to Mailing List :	Both
Submission Method :	Website
Other Submission Method :	
Submission Date :	01/07/2009
Submission Content/Notes :	Yes, it would be the best thing for us.

DEPARTMENT OF TRANSPORTATION SERVICES

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-333008

Imoa Faletogo
P.O. Box 31029
Honolulu, Hawaii 96820

Dear Imoa Faletogo:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraph addresses your comments regarding the above-referenced submittal:

While each of the alternatives discussed in the Draft EIS includes trade-offs between benefits and impacts, the Airport Alternative from East Kapolei to Ala Moana has been selected as the Preferred Alternative as described above. As compared to the alternatives discussed in the Draft EIS, the Airport Alternative will carry the most passengers, provide the greatest transit-user benefits, and result in the fewest vehicle hours of delay. It will provide access to employment centers at Pearl Harbor Naval Base and Honolulu International Airport and will serve the Salt Lake neighborhood with connecting bus service. Of the three Build Alternatives addressed in the Draft EIS, the Airport Alternative will have slightly less impacts to the natural and built environment analyzed in the Draft EIS. During the public comment period on the Draft EIS, the public overwhelmingly supported the Airport Alternative. Of the comments that specifically supported one of the alternatives, more than 75 percent were in support of the

Airport Alternative. For more information this selection is discussed in Section 2.4 of the Final EIS. Since publication of the Draft EIS, design has been advanced, further analysis has been completed, and information has been added in response to comments on the Draft EIS and agency coordination. The Final EIS discusses the process that was used to select the Preferred Alternative, how comments were considered in the decision-making process, impacts and mitigation commitments.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
Creation Date :	1/7/2009
Creator Affiliation :	
First Name :	Moeone
Last Name :	Faletogo
Business/Organization :	Good Samaritan Church
Address :	P.O Box 31029
Alternative Preference :	
Apt./Suite No. :	
City :	Honolulu
State :	HI
Zip Code :	96820
Email :	gsc_hawaii@yahoo.com
Telephone :	
Telephone Extension :	
Add to Mailing List :	Both
Submission Method :	Website
Other Submission Method :	
Submission Date :	01/07/2009
Submission Content/Notes :	I support the Rail Transit

DEPARTMENT OF TRANSPORTATION SERVICES

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-332994

Mr. Moeone Faletogo
P.O. Box 31029
Honolulu, Hawaii 96820

Dear Mr. Faletogo:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraph addresses your comments regarding the above-referenced submittal:

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Airport Alternative. For more information this selection is discussed in Section 2.4 of the Final EIS. Since publication of the Draft EIS, design has been advanced, further analysis has been completed, and information has been added in response to comments on the Draft EIS and agency coordination. The Final EIS discusses the process that was used to select the Preferred Alternative, how comments were considered in the decision-making process, impacts and mitigation commitments.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
Creation Date :	1/7/2009
Creator Affiliation :	
First Name :	Asomaliu
Last Name :	Faualo
Business/Organization :	Good Samaritan Church
Address :	P.O Box 31029
Alternative Preference :	
Apt./Suite No. :	
City :	Honolulu
State :	HI
Zip Code :	96820
Email :	faualomanase@yahoo.com
Telephone :	808-699-3294
Telephone Extension :	
Add to Mailing List :	Both
Submission Method :	Website
Other Submission Method :	
Submission Date :	01/07/2009
Submission Content/Notes :	I fully support the building of the the Rail Transit.

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-332993

Ms. Asomaliu Faualo
P.O. Box 31029
Honolulu, Hawaii 96820

Dear Ms. Faualo:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

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Airport Alternative. For more information this selection is discussed in Section 2.4 of the Final EIS. Since publication of the Draft EIS, design has been advanced, further analysis has been completed, and information has been added in response to comments on the Draft EIS and agency coordination. The Final EIS discusses the process that was used to select the Preferred Alternative, how comments were considered in the decision-making process, impacts and mitigation commitments.

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Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
Creation Date :	1/7/2009
Creator Affiliation :	
First Name :	Manase
Last Name :	Faualo
Business/Organization :	Good Samaritan Church
Address :	P.O Box 31029
Alternative Preference :	
Apt./Suite No. :	
City :	Honolulu
State :	HI
Zip Code :	96820
Email :	faualomanase@yahoo.com
Telephone :	808-341-4404
Telephone Extension :	
Add to Mailing List :	Both
Submission Method :	Website
Other Submission Method :	
Submission Date :	01/07/2009
Submission Content/Notes :	The Rail Transit is necessary to cut down traffic now and years to come

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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HONOLULU, HAWAII 96813
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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-332989

Mr. Manase Faualo
P.O. Box 31029
Honolulu, Hawaii 96820

Dear Mr. Faualo:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

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Airport Alternative. For more information this selection is discussed in Section 2.4 of the Final EIS. Since publication of the Draft EIS, design has been advanced, further analysis has been completed, and information has been added in response to comments on the Draft EIS and agency coordination. The Final EIS discusses the process that was used to select the Preferred Alternative, how comments were considered in the decision-making process, impacts and mitigation commitments.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

298449

RECEIVED
09 FEB 5 P12:34
DEPT OF TRANSPORTATION SERVICES
CITY & COUNTY OF HONOLULU

Zippy's
RESTAURANTS

February 3, 2009

Mr. Wayne Y. Yoshioka
Department of Transportation Services
City and County of Honolulu
650 King Street, 3rd floor
Honolulu, HI 96813

Dear Mr. Yoshioka,

Thank you for the opportunity to share our concerns and questions related to the Honolulu Rail Transit project and its potential effect on our business. We understand the complexities of such a massive undertaking and we hope our comments may assist the process.

While we have a number of stores along the proposed route, this letter is specific to our **Zippy's Dillingham** restaurant, located at **1210 Dillingham Boulevard**, within a shopping and business complex. We opened in July 1980 and serve the local community through our 24 hour restaurant, fast food operation and bakery. As you may know, over the years our establishment has become a favorite spot for residents, students and employees of businesses in Kapalama and its surrounding areas.

Our comments and concerns on the potential effects of the project are as follows.

1. **Impact of construction on our customer experience.** As our store sits on property immediately adjacent to Dillingham Boulevard and the proposed rail route, we anticipate being adversely affected by noise and dust, dewatering and excavation. We would appreciate information at least 90 days in advance on specific construction scheduling, including dates and time of day as well as proposed methods to minimize impact.
2. **Impact on traffic.** We have entrances off of Dillingham for Koko Head and Ewa bound traffic that are critical to our customer flow and must remain unobstructed throughout the process. We would also be concerned with any restriction of traffic flow Koko Head bound turning left from Dillingham Boulevard onto Kohou Street as well as vehicle and pedestrian access across the bridge over Kapalama Stream. As this thoroughfare is already heavily congested during early morning and mid afternoon hours, we expect that construction will further impede customer access to our store, extend our employees' commute and delay deliveries. Advanced information on proposed traffic flow during the various stages of construction would be beneficial.
3. **Street Upgrades.** With the opening of the stations, we foresee a need to improve the crosswalks across Dillingham Boulevard in consideration of the safety of increased pedestrian traffic moving to and from the station and the neighboring businesses. We are particularly concerned for the safety of our

1765 SOUTH KING • HONOLULU, HAWAII 96826 • PHONE 808 973-0880 • FAX 808 973-0888 • WEBSITE WWW.ZIPPYS.COM
A DIVISION OF FCH ENTERPRISES, INC

employees and customers using the rail during evening and early morning periods when proper lighting is essential.

4. **Available Parking.** We understand that the Kapalama Station will include parking and unless adequate stalls are available, rail user parking may overflow into our shopping complex's lot. Specifics on the station, its parking capacity and overflow contingency plans would be appreciated.
5. **Store Visibility.** Dependent on the height of the rail and the placement of the support columns, we have concerns the visibility of our restaurant and its signage from the eastbound lanes and from across the street. We would be interested in how this circumstance might be addressed.
6. **RPT Considerations.** We would be interested in any adjustments the county is considering for real property taxes for those areas immediately impacted by construction and rail operation. In addition, we'd like to know what mechanisms might be instituted to require "pass through" of any related savings from landlord to tenant.

In general, timely communication of the final plans for construction and information on the operation of the rail transit system would be crucial for our store, our patrons and neighbors along the route. We intend to be proactive and prepare ourselves for the temporary disruptions brought by construction and more importantly to evolve our products and services as customer habits and the business landscape change with the introduction of rail service.

While we have listed our major concerns please be assured that we also appreciate the many benefits and opportunities development of rail transit will bring to our island. Please feel free to contact me directly if you require further clarification on any of the above.

Sincerely,

Paul S. Yokota
Chief Operating Officer
FCH Enterprises, Inc.

cc: Kamehameha Schools and Bishop Estate

1765 SOUTH KING • HONOLULU, HAWAII 96826 • PHONE 808 973-0880 • FAX 808 973-0888 • WEBSITE WWW.ZIPPYS.COM
A DIVISION OF FCH ENTERPRISES, INC.

DEPARTMENT OF TRANSPORTATION SERVICES

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT2/09-298449R

Mr. Paul S. Yokota, Chief Operating Officer
FCH Enterprises
1765 South King Street
Honolulu, Hawaii 96826

Dear Mr. Yokota:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal for Zippy's Dillingham, 1210 Dillingham Boulevard:

Your comments will be addressed in the same manner as submitted.

1. *Construction*

Section 4.18.1 of the Final EIS discusses the effects construction will have on businesses. Communication and coordination with businesses will occur throughout the construction period. Access to businesses near construction activities could be temporarily affected, but access will be maintained.

The contractor will be given parameters, such as the number of lanes that may be closed and the procedures for closures, and will develop a Maintenance

of Traffic (MOT) Plan that must be reviewed and approved by the City and/or the Hawaii Department of Transportation (HDOT).

Proposed mitigation may include the following:

- *Coordinate construction planning and phasing with nearby property owners and businesses.*
- *Develop a public involvement plan prior to construction to inform business owners of the construction schedule and activities.*
- *Initiate public information campaigns, including signs and lighting, to reassure people that businesses are open during construction and to encourage their continued patronage.*
- *Minimize the extent and number of businesses, jobs, and access affected during construction.*
- *To the extent practicable, coordinate the timing of temporary facility closures to minimize impacts to business activities—especially those related to seasonal or high sales periods.*
- *Minimize, as practical, the duration of modified or lost access to businesses.*
- *Provide public information (e.g., press releases or newsletters) regarding construction activities and ongoing business activities, including advertisements in print and on television and radio.*
- *Phase construction in each area so as to maintain access to individual businesses, pedestrians, bicyclists, passenger vehicles, and trucks during business hours and important business seasons.*
- *Provide advance notice if utilities will be disrupted and schedule major utility shutoffs during non-business hours.*

2. *Traffic during construction*

As discussed in Chapter 3 of the Final EIS, the MOT Plan will identify measures to mitigate temporary construction-related effects on transportation. The contractor will develop the MOT Plan, which will be reviewed and approved by the City and/or HDOT. The MOT Plan will address roadway closures for streets identified in Table 3-27 of the Final EIS. The MOT Plan will also address the relocation of freight loading zones that could be temporarily affected. All left-turns at signalized intersections along Dillingham Boulevard will remain after the guideway is in place.

Section 4.18.1 of the Final EIS discusses several public involvement strategies that will be used to inform businesses and the public about construction activities, including roadway detours. These strategies include a public involvement plan developed prior to construction to inform business owners of the construction schedule and activities, public information campaigns to reassure people that businesses are open during construction and to encourage their continued patronage, and public information regarding construction activities and ongoing business activities provided in print and on television and radio.

3. Street upgrades

Over time there could be increased pedestrian traffic around station areas. It is expected that transit patrons and other pedestrians will use existing signalized crosswalks near the station at Kokea and Kohou Streets.

Higher volumes of pedestrians and bicycles are expected near stations. DTS will work with other City departments and HDOT to identify and improve key pedestrian and bicycle routes to stations and to improve overall safety and accessibility near station entrances. All stations will have security lighting.

4. Available parking

No parking will be provided at the Kapalama Station. Chapter 3 of the Final EIS discusses measures to address the effects of parking spillover near stations. As noted in Section 3.4.4 of the Final EIS, station areas with the highest estimated demands for spillover parking are at West Loch, Pearlridge, Iwilei, and Ala Moana Center. Section 3.4.7 of the Final EIS states that the City will consider strategies in coordination with appropriate stakeholders to mitigate any loss of parking supply and for increased demand from spillover parking near stations.

5. Store visibility

The Project will be set in an urban context where visual change is expected and differences in scales of structures are typical. Section 4.8.3 of the Final EIS acknowledges that along Dillingham Boulevard, "mauka-makai views will be obstructed from various points... and visual effects will be moderate." Note that the guideway will be in the highway median, which is a busy thoroughfare comprised of several lanes of traffic, and the support columns will be spaced at substantial intervals of 120 to 150 feet. As part of the Final Design process, the DTS has developed specifications and design criteria to address the City's requirements for the Project, which will include final placement of columns. Minimizing effects to adjacent land uses will be a key consideration.

6. RPT considerations

The City has not proposed any property tax rate changes or credits associated with construction of the Project.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Zippy's
RESTAURANTS

February 4, 2009

Mr. Wayne Y. Yoshioka
Department of Transportation Services
City and County of Honolulu
650 King Street, 3rd floor
Honolulu, HI 96813

Dear Mr. Yoshioka,

Thank you for the opportunity to share our concerns and questions related to the Honolulu Rail Transit project and its potential effect on our business. We understand the complexities of such a massive undertaking and we hope our comments may assist the process.

While we have a number of stores along the proposed route, this letter is specific to our **Zippy's Pearlridge** restaurant, located at the **Pearlridge Center** on Kamehameha Highway, a major shopping and business complex. We opened in June 1986 and serve the local community through our fast food operation and bakery. As you may know, over the years Zippys has become a favorite spot for residents and employees of businesses in Pearl City and its surrounding areas.

Our comments and concerns on the potential effects of the project are as follows.

1. **Impact of construction on our customer experience.** As our store sits immediately adjacent to the highway, we anticipate being adversely affected by noise and dust, dewatering and excavation. We would appreciate information at least 90 days in advance on construction scheduling including dates and time of day as well as methods proposed to minimize impact.
2. **Impact on traffic during construction.** We would be concerned with any restriction of traffic flow Koko Head bound turning left from Kamehameha Highway onto Pali Momi Street which runs adjacent to the mall. The highway is already heavily congested during early morning and mid afternoon hours and we expect that construction will further impede customer access to our store, extend our employees' commute and delay deliveries. Advanced information on proposed traffic flow during the various stages of construction would be beneficial.
3. **Street Upgrades.** With the opening of the station, we foresee a need to improve the crosswalks across Kamehameha Highway in consideration of the safety of increased pedestrian traffic moving to and from the station and from the businesses on either side of the highway. We are particularly concerned for the safety of our employees and customers using the rail during evening and early morning periods when proper lighting is critical.

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4. **Store Visibility.** Dependent on the height of the rail and the placement of the support columns, we are concerned of the visibility of our restaurant and its signage from the eastbound lanes and from across the highway. We would be interested in how this circumstance might be addressed.
5. **Available Parking.** We understand that there may be a private developer involved in the Pearlridge station and we'd be interested in the parking capacity and proposed inclusions in the facility. Should transportation be provided from the station to the mall, and if station parking is inadequate we anticipate passengers attempting to use mall parking facilities instead. We'd appreciate information on proposed overflow parking contingencies.
6. **RPT Considerations.** We would be interested in any adjustments the county is considering for real property taxes for those areas immediately impacted by construction. In addition, we'd like to know what mechanisms might be instituted to require "pass through" of any related savings from landlord to tenant.

In general, timely communication of the final plans for construction and information on the operation of the rail transit system would be crucial for our store, our patrons and neighbors along the route. We intend to be proactive and prepare ourselves for the temporary disruptions brought by construction, and more importantly to evolve our products and services as customer habits and the business landscape change with the introduction of rail service.

While we have listed our major concerns, please be assured that we also appreciate the many benefits and opportunities development of rail transit will bring to our island. Please feel free to contact me directly if you require further clarification on any of the above.

Sincerely,

Paul S. Yokota
Chief Operating Officer

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AR00001721

DEPARTMENT OF TRANSPORTATION SERVICES

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010 RT10/09-298449R

Mr. Paul S. Yokota, Chief Operating Officer
FCH Enterprises
1765 South King Street
Honolulu, Hawaii 96826

Dear Mr. Yokota:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal for Zippy's Pearlridge, Pearlridge Center:

Your comments will be addressed in the same manner as submitted.

1. Construction

Section 4.18.1 of the Final EIS discusses the effects construction will have on businesses. Communication and coordination with businesses will occur throughout the construction period. Access to businesses near construction activities could be temporarily affected, but access will be maintained.

The contractor will be given parameters, such as the number of lanes that may be closed and the procedures for closures, and will develop a Maintenance of Traffic (MOT) Plan that must be reviewed and approved by the City and/or the Hawaii Department of Transportation (HDOT).

Proposed mitigation may include the following:

- *Coordinate construction planning and phasing with nearby property owners and businesses.*
- *Develop a public involvement plan prior to construction to inform business owners of the construction schedule and activities.*
- *Initiate public information campaigns, including signs and lighting, to reassure people that businesses are open during construction and to encourage their continued patronage.*
- *Minimize the extent and number of businesses, jobs, and access affected during construction.*
- *To the extent practicable, coordinate the timing of temporary facility closures to minimize impacts to business activities—especially those related to seasonal or high sales periods.*
- *Minimize, as practical, the duration of modified or lost access to businesses.*
- *Provide public information (e.g., press releases or newsletters) regarding construction activities and ongoing business activities, including advertisements in print and on television and radio.*
- *Phase construction in each area so as to maintain access to individual businesses, pedestrians, bicyclists, passenger vehicles, and trucks during business hours and important business seasons.*
- *Provide advance notice if utilities will be disrupted and schedule major utility shutoffs during non-business hours.*

2. *Traffic during construction*

As discussed in Chapter 3 of the Final EIS, an MOT Plan will identify measures to mitigate temporary construction-related effects on transportation. The contractor will develop the MOT Plan, which will be reviewed and approved by the City and/or HDOT. The MOT Plan will address roadway closures for streets identified in Table 3-27 of the Final EIS. The MOT Plan will also address the relocation of freight loading zones that could be temporarily affected. All left

turns at signalized intersections along Kamehameha Highway will remain upon completion of the fixed guideway system.

In addition, Section 4.18.1 of the Final EIS discusses several public involvement strategies that will be used to inform businesses and the public about construction activities, including roadway detours. These strategies include a public involvement plan developed prior to construction to inform business owners of the construction schedule and activities, public information campaigns to reassure people that businesses are open during construction and to encourage their continued patronage, and public information regarding construction activities and ongoing business activities provided in print and on television and radio.

3. *Street upgrades*

The nearby Pearlridge Station will have a concourse connecting both train platforms to entrances on each side of Kamehameha Highway. Therefore, it will not be necessary for transit patrons to cross the highway at-grade. However, over time there could be increased pedestrian traffic around station areas. It is expected that pedestrians in this area will use the existing signalized crosswalk at Kaonohi Street.

Higher volumes of pedestrians and bicycles are expected near stations. DTS will work with other City departments and HDOT to identify and improve key pedestrian and bicycle routes to stations and to improve overall safety and accessibility near station entrances. All stations will have security lighting.

4. *Store visibility*

Store signage that is below the elevation of the guideway will be visible under the guideway to travelers on Kamehameha Highway.

5. *Available parking*

To address your first comment under this heading, a private developer is not involved in the Pearlridge Station. Regarding your second comment, Section 3.4.7 of the Final EIS identifies potential mitigation approaches for parking effects, including spillover parking. As noted in this section, the approaches to mitigating effects of spillover parking will be unique to each station area. Mitigation strategies will be determined in coordination with appropriate stakeholders.

6. *RPT considerations*

The City has not proposed any property tax rate changes or credits associated with construction of the Project.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Zippy's
RESTAURANTS

February 3, 2009

Mr. Wayne Y. Yoshioka
Department of Transportation Services
City and County of Honolulu
650 King Street, 3rd floor
Honolulu, HI 96813

Dear Mr. Yoshioka,

Thank you for the opportunity to express our concerns and questions related to the Honolulu Rail Transit project and its potential effect on our business. We understand the complexities of such a massive undertaking and we hope our comments may assist the process.

While we have a number of stores along the proposed route, this letter is specific to our **Zippy's Waimalu** restaurant, located at **98048 Kamehameha Highway**, adjacent to a shopping and business complex. We opened in April 1972 and we serve the local community through our 24 hour fast food operation and bakery. As you may know, over the years Zippys has become a favorite spot for residents and employees of businesses in Pearl City and its surrounding areas.

Our comments and concerns on the potential effects of the project are as follows.

1. **Impact of construction on our customer experience.** As our store sits immediately adjacent to the highway, we anticipate being adversely affected by noise and dust, dewatering and excavation. We would appreciate information at least 90 days in advance on specific construction schedules, including dates and time of day as well as methods proposed to minimize impact.
2. **Impact on traffic during construction.** We would be concerned with any restriction of traffic flow Koko Head bound turning left from Kamehameha Highway onto Kanuku Street which runs adjacent to our store. We also have a right turn entrance off the highway westbound that is critical to our customer traffic and must remain unobstructed throughout the process. As the highway is already heavily congested during early morning and mid afternoon hours we expect that construction will further impede customer access to our store, extend our employees' commute and delay deliveries. Advanced information on proposed traffic flow during the various stages of construction would be beneficial.
3. **Street Upgrades.** With the opening of the station, we foresee a need to improve the crosswalks across Kamehameha Highway specifically at Kanuku Street in consideration of the safety of increased pedestrian traffic moving to and from the station and from the businesses on either side of the highway. We are

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particularly concerned for the safety of our employees and customers using the rail during evening and early morning periods when proper lighting is critical.

4. **Store Visibility.** Dependent on the height of the rail and the placement of the support columns we are concerned of the visibility of our restaurant and its signage from the eastbound lanes and from across the highway. We would be interested in how this circumstance might be addressed.
5. **Available Parking.** We understand that there may be a private developer involved in the Pearlridge station and we'd be interested in the parking requirements as well as the capacity and proposed inclusions in the facility.
6. **RPT Considerations.** We would be interested in any adjustments the county is considering for real property taxes for those areas immediately impacted by construction. In addition, we'd like to know what mechanisms might be instituted to require "pass through" of any related savings from landlord to tenant.

In general, timely communication of the final plans for construction and information on the operation of the rail transit system would be crucial for our store, our patrons and neighbors along the route. We intend to be proactive and prepare ourselves for the temporary disruptions brought by construction and more importantly to evolve our products and services as customer habits and the business landscape change with the introduction of rail service.

While we have listed our major concerns, please be assured that we also appreciate the many benefits and opportunities development of rail transit will bring to our island. Please feel free to contact me directly if you require further clarification on any of the above.

Sincerely,

Paul S. Yokota
Chief Operating Officer

cc: Kanataki Estate

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DEPARTMENT OF TRANSPORTATION SERVICES

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT10/09-298449R

Mr. Paul S. Yokota, Chief Operating Officer
FCH Enterprises
1765 South King Street
Honolulu, Hawaii 96826

Dear Mr. Yokota:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal for Zippy's Waimalu, 98048 Kamehameha Highway:

Your comments will be addressed in the same manner as submitted.

1. Construction

Section 4.18.1 of the Final EIS discusses the effects construction will have on businesses. Communication and coordination with businesses will occur throughout the construction period. Access to businesses near construction activities could be temporarily affected, but access will be maintained.

The contractor will be given parameters, such as the number of lanes that may be closed and the procedures for closures, and will develop a Maintenance of Traffic (MOT) Plan that must be reviewed and approved by the City and/or the Hawaii Department of Transportation (HDOT).

Proposed mitigation may include the following:

- *Coordinate construction planning and phasing with nearby property owners and businesses.*
- *Develop a public involvement plan prior to construction to inform business owners of the construction schedule and activities.*
- *Initiate public information campaigns, including signs and lighting, to reassure people that businesses are open during construction and to encourage their continued patronage*
- *Minimize the extent and number of businesses, jobs, and access affected during construction.*
- *To the extent practicable, coordinate the timing of temporary facility closures to minimize impacts to business activities—especially those related to seasonal or high sales periods.*
- *Minimize, as practical, the duration of modified or lost access to businesses.*
- *Provide public information (e.g., press releases or newsletters) regarding construction activities and ongoing business activities, including advertisements in print and on television and radio.*
- *Phase construction in each area so as to maintain access to individual businesses, pedestrians, bicyclists, passenger vehicles, and trucks during business hours and important business seasons.*
- *Provide advance notice if utilities will be disrupted and schedule major utility shutoffs during non-business hours.*

2. *Traffic during construction*

As discussed in Chapter 3 of the Final EIS, an MOT Plan will identify measures to mitigate temporary construction-related effects on transportation. The contractor will develop the MOT Plan, which will be reviewed and approved by the City and/or HDOT. The MOT Plan will address roadway closures for streets identified in Table 3-27 of the Final EIS. The MOT Plan will also address the relocation of freight loading zones that could be temporarily affected. All left turns at signalized intersections along Kamehameha Highway will remain upon completion of the fixed guideway system.

In addition, Section 4.18.1 of the Final EIS discusses several public involvement strategies that will be used to inform businesses and the public about construction activities, including roadway detours. These strategies include a public involvement plan developed prior to construction to inform business owners of the construction schedule and activities, public information campaigns

to reassure people that businesses are open during construction and to encourage their continued patronage, and public information regarding construction activities and ongoing business activities provided in print and on television and radio.

Higher volumes of pedestrians and bicycles are expected near stations. DTS will work with other City departments and HDOT to identify and improve key pedestrian and bicycle routes to stations and to improve overall safety and accessibility near station entrances. All stations will have security lighting.

3. Street upgrades

The nearby Pearlridge Station will have a concourse connecting both train platforms to entrances on each side of Kamehameha Highway. Therefore, it will not be necessary for transit patrons to cross the highway at-grade. However, over time there could be increased pedestrian traffic around station areas. It is expected that pedestrians in this area will use the existing signalized crosswalk at Kanuku Street.

4. Store visibility

Store signage that is below the elevation of the guideway will be visible under the guideway to travelers on Kamehameha Highway.

5. Available parking

A private developer is not involved in the Pearlridge Station.

6. RPT considerations

The City has not proposed any property tax rate changes or credits associated with construction of the Project.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Zippy's
RESTAURANTS

February 3, 2009

Mr. Wayne Y. Yoshioka
Department of Transportation Services
City and County of Honolulu
650 King Street, 3rd floor
Honolulu, HI 96813

Dear Mr. Yoshioka,

Thank you for the opportunity to express our concerns and questions related to the Honolulu Rail Transit project and its potential effect on our business. We understand the complexities of such a massive undertaking and we hope our comments may assist the process.

While we have a number of stores along the proposed route, this letter is specific to our **Zippy's Waiau** restaurant, located at **450 Kamehameha Highway**, in a shopping and business complex. We opened in November 1978 and we serve the local community through our 24 hour fast food operation, restaurant and bakery. As you may know, over the years Zippys has become a favorite gathering spot for residents and employees of businesses in Pearl City and its surrounding areas.

Our comments and concerns on the potential effects of the project are as follows.

1. **Impact of construction on our customer experience.** As our store sits immediately adjacent to the highway, we anticipate being adversely affected by noise and dust, dewatering and excavation. We would appreciate information at least 90 days in advance on specific construction scheduling including dates and time of day as well as methods proposed to minimize impact.
2. **Impact on traffic during construction.** We would be concerned with any restriction temporary or permanent of the u-turn access both Ewa and Koko Head bound through the medial strip on Kamehameha Highway in the store's immediate vicinity. Our main entrance is a right turn off of the highway, Ewa bound which must remain unobstructed throughout the process. As the highway is already heavily congested during early morning and mid afternoon hours, we expect that construction will further impede customer access to our store, extend our employees' commute and delay deliveries. Advanced information on proposed traffic flow during the various stages of construction would be beneficial.
3. **Street Upgrades.** With the opening of the station, we foresee a need to improve the crosswalks across Kamehameha Highway in consideration of the safety of increased pedestrian traffic moving to and from the station landings. We are particularly concerned for the safety of our employees and customers using the rail during evening and early morning periods when proper lighting is critical.

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4. **Store Visibility**. Dependent on the height of the rail and the placement of the support columns we are concerned of the visibility of our restaurant and its signage from the eastbound lanes and from across the highway. We would be interested in how this circumstance might be addressed.
5. **RPT Considerations**. We would be interested in any adjustments the county is considering for real property taxes for those areas immediately impacted by construction. In addition, we'd like to know what mechanisms might be instituted to require "pass through" of any related savings from landlord to tenant.

In general, timely communication of the final plans for construction and information on the operation of the rail transit system would be crucial for our store, our patrons and neighbors along the route. We intend to be proactive and prepare ourselves for the temporary disruptions brought by construction, and more importantly to evolve our products and services as customer habits and the business landscape change with the introduction of rail service.

While we have listed our major concerns, please be assured that we also appreciate the many benefits and opportunities development of rail transit will bring to our island. Please feel free to contact me directly if you require further clarification on any of the above.

Sincerely,

Paul S. Yokota
Chief Operating Officer

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010 RT10/09-298449R

Mr. Paul S. Yokota, Chief Operating Officer
FCH Enterprises
1765 South King Street
Honolulu, Hawaii 96826

Dear Mr. Yokota:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal for Zippy's Waiau, 450 Kamehameha Highway:

Your comments will be addressed in the same manner as submitted.

1. Construction

Section 4.18.1 of the Final EIS discusses the effects construction will have on businesses. Communication and coordination with businesses will occur throughout the construction period. Access to businesses near construction activities could be temporarily affected, but access will be maintained.

The contractor will be given parameters, such as the number of lanes that may be closed and the procedures for closures, and will develop a Maintenance of Traffic (MOT) Plan that must be reviewed and approved by the City and/or the Hawaii Department of Transportation (HDOT).

Proposed mitigation may include the following:

- *Coordinate construction planning and phasing with nearby property owners and businesses.*
- *Develop a public involvement plan prior to construction to inform business owners of the construction schedule and activities.*
- *Initiate public information campaigns, including signs and lighting, to reassure people that businesses are open during construction and to encourage their continued patronage*
- *Minimize the extent and number of businesses, jobs, and access affected during construction.*
- *To the extent practicable, coordinate the timing of temporary facility closures to minimize impacts to business activities—especially those related to seasonal or high sales periods.*
- *Minimize, as practical, the duration of modified or lost access to businesses.*
- *Provide public information (e.g., press releases or newsletters) regarding construction activities and ongoing business activities, including advertisements in print and on television and radio.*
- *Phase construction in each area so as to maintain access to individual businesses, pedestrians, bicyclists, passenger vehicles, and trucks during business hours and important business seasons.*
- *Provide advance notice if utilities will be disrupted and schedule major utility shutoffs during non-business hours.*

2. *Traffic during construction*

As discussed in Chapter 3 of the Final EIS, an MOT Plan will identify measures to mitigate temporary construction-related effects on transportation. The contractor will develop the MOT Plan, which will be reviewed and approved by the City and/or HDOT. The MOT Plan will address roadway closures for streets identified in Table 3-27 of the Final EIS. The MOT Plan will also address the relocation of freight loading zones that could be temporarily affected. All left turns at signalized intersections along Kamehameha Highway will remain upon completion of the fixed guideway system. The U-turns near the Waiau Zippy's will be removed permanently.

In addition, Section 4.18.1 of the Final EIS discusses several public involvement strategies that will be used to inform businesses and the public about construction activities, including roadway detours. These strategies include a public involvement plan developed prior to construction to inform business

owners of the construction schedule and activities, public information campaigns to reassure people that businesses are open during construction and to encourage their continued patronage, and public information regarding construction activities and ongoing business activities provided in print and on television and radio.

Higher volumes of pedestrians and bicycles are expected near stations. DTS will work with other City departments and HDOT to identify and improve key pedestrian and bicycle routes to stations and to improve overall safety and accessibility near station entrances. All stations will have security lighting.

3. Street upgrades

The closest station to this location will be Pearlridge, which will have a concourse connecting both train platforms to entrances on each side of Kamehameha Highway. Therefore, it will not be necessary for transit patrons to cross the highway at-grade. However, over time there could be increased pedestrian traffic around station areas. It is expected that pedestrians in this area will use the existing signalized crosswalk at Kuleana Road.

4. Store visibility

Store signage that is below the elevation of the guideway will be visible under the guideway to travelers on Kamehameha Highway.

5. RPT considerations

The City has not proposed any property tax rate changes or credits associated with construction of the Project.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

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Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Zippy's
RESTAURANTS

February 3, 2009

Mr. Wayne Y. Yoshioka
Department of Transportation Services
City and County of Honolulu
650 King Street, 3rd floor
Honolulu, HI 96813

Dear Mr. Yoshioka,

Thank you for the opportunity to express our concerns and questions related to the Honolulu Rail Transit project and its potential effect on our business. We understand the complexities of such a massive undertaking and we hope our comments may assist the process.

While we have a number of stores along the proposed route, this letter is specific to our **Zippy's Pearl City** restaurant, located at **806 Kamehameha Highway**, adjacent to a shopping and business complex. We opened in June 1986 and we serve the local community through our 24 hour fast food operation, restaurant and bakery. As you may know, over the years Zippys has become a favorite gathering spot for residents and employees of businesses in Pearl City and its surrounding areas.

Our comments and concerns on the potential effects of the project are as follows.

1. **Impact of construction on our customer experience.** As our store sits immediately adjacent to the highway, we anticipate being adversely affected by noise and dust, dewatering and excavation. We would appreciate specific information at least 90 days in advance on specific construction scheduling including dates and time of day as well as methods proposed to minimize impact.
2. **Impact on traffic during construction.** We would be concerned with any restriction of traffic flow Koko Head bound turning left from Kamehameha Highway onto Puu Momi Street which serves our complex. We also have a right turn entrance off the highway Ewa bound that is critical to our customer traffic and must remain unobstructed throughout the process. The highway is already heavily congested during early morning and mid afternoon hours and we expect that construction will further impede customer access to our store, extend our employees' commute and delay deliveries. Advanced information on proposed traffic flow during the various stages of construction would be beneficial.
3. **Street Upgrades.** With the opening of the stations, we foresee a need to improve the crosswalks across Kamehameha Highway in consideration of the safety of increased pedestrian traffic moving to and from the station landings. We are particularly concerned for the safety of our employees and customers using the rail during evening and early morning periods when proper lighting is critical.

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Zippy's
RESTAURANTS

4. **Store Visibility.** Dependent on the height of the rail and the placement of the support columns, we are concerned of the visibility of our restaurant and its signage from the eastbound lanes and from across the highway. We would be interested in how this circumstance might be addressed.
5. **RPT Considerations.** We would be interested in any adjustments the county is considering for real property taxes for those areas immediately impacted by construction. In addition, we'd like to know what mechenisms might be instituted to require "pass through" of any related savings from landlord to tenant.

In general, timely communication of the final plans for construction and information on the operation of the rail transit system would be crucial for our store, our patrons and neighbors along the route. We intend to be proactive and prepare ourselves for the temporary disruptions brought by construction, and more importantly to evolve our products and services as customer habits and the business landscape change with the introduction of rail service.

While we have listed our major concerns, please be assured that we also appreciate the many benefits and opportunities development of rail transit will bring to our island. Please feel free to contact me directly if you require further clarification on any of the above.

Sincerely,

Paul S. Yokota
Chief Operating Officer
FCH Enterprises, Inc.

cc: Weinberg Estate

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AR00001737

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010 RT10/09-298449R

Mr. Paul S. Yokota, Chief Operating Officer
FCH Enterprises
1765 South King Street
Honolulu, Hawaii 96826

Dear Mr. Yokota:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal for Zippy's Pearl City, 806 Kamehameha Highway:

Your comments will be addressed in the same manner as submitted.

1. *Construction*

Section 4.18.1 of the Final EIS discusses the effects construction will have on businesses. Communication and coordination with businesses will occur throughout the construction period. Access to businesses near construction activities could be temporarily affected, but access will be maintained.

The contractor will be given parameters, such as the number of lanes that may be closed and the procedures for closures, and will develop a Maintenance

of Traffic (MOT) Plan that must be reviewed and approved by the City and/or the Hawaii Department of Transportation (HDOT).

Proposed mitigation may include the following:

- *Coordinate construction planning and phasing with nearby property owners and businesses.*
- *Develop a public involvement plan prior to construction to inform business owners of the construction schedule and activities.*
- *Initiate public information campaigns, including signs and lighting, to reassure people that businesses are open during construction and to encourage their continued patronage.*
- *Minimize the extent and number of businesses, jobs, and access affected during construction.*
- *To the extent practicable, coordinate the timing of temporary facility closures to minimize impacts to business activities—especially those related to seasonal or high sales periods.*
- *Minimize, as practical, the duration of modified or lost access to businesses.*
- *Provide public information (e.g., press releases or newsletters) regarding construction activities and ongoing business activities, including advertisements in print and on television and radio.*
- *Phase construction in each area so as to maintain access to individual businesses, pedestrians, bicyclists, passenger vehicles, and trucks during business hours and important business seasons.*
- *Provide advance notice if utilities will be disrupted and schedule major utility shutoffs during non-business hours.*

2. *Traffic during construction*

As discussed in Chapter 3 of the Final EIS, an MOT Plan will identify measures to mitigate temporary construction-related effects on transportation. The contractor will develop the MOT Plan, which will be reviewed and approved by the City and/or HDOT. The MOT Plan will address roadway closures for streets identified in Table 3-27 of the Final EIS. The MOT Plan will also address the relocation of freight loading zones that could be temporarily affected. All left turns at signalized intersections along Farrington Highway will remain upon completion of the fixed guideway system.

In addition, Section 4.18.1 of the Final EIS discusses several public involvement strategies that will be used to inform businesses and the public about

construction activities, including roadway detours. These strategies include a public involvement plan developed prior to construction to inform business owners of the construction schedule and activities, public information campaigns to reassure people that businesses are open during construction and to encourage their continued patronage, and public information regarding construction activities and ongoing business activities provided in print and on television and radio.

Higher volumes of pedestrians and bicycles are expected near stations. DTS will work with other City departments and HDOT to identify and improve key pedestrian and bicycle routes to stations and to improve overall safety and accessibility near station entrances. All stations will have security lighting.

3. Street Upgrades

The closest station to this location will be either Pearl Highlands or Pearlridge, and employees and customers will likely take a bus from one of these stations to reach this location. It is expected that pedestrians in this area will use the existing signalized crosswalk at Puu Momi Street.

4. Store visibility

Store signage that is below the elevation of the guideway will be visible under the guideway to travelers on Kamehameha Highway.

5. RPT considerations

The City has not proposed any property tax rate changes or credits associated with construction of the Project.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Zippy's
RESTAURANTS

February 3, 2009

Mr. Wayne Y. Yoshioka
Department of Transportation Services
City and County of Honolulu
650 King Street, 3rd floor
Honolulu, HI 96813

Dear Mr. Yoshioka,

Thank you for the opportunity to share our concerns and questions related to the Honolulu Rail Transit project and its potential effect on our business. We understand the complexities of such a massive undertaking and we hope our comments may assist the process.

While we have a number of stores along the proposed route this, letter is specific to our **Zippy's Waipahu** restaurant, located at **94-180 Farrington Highway**, on the southeast corner of a shopping and business complex. We opened in April 1971, renovated in 2009 and we serve the local community through our 24 hour fast food operation, restaurant and bakery. As you may know, over the years Zippys has become a favorite gathering spot for residents and employees of businesses in Waipahu and its surrounding areas.

Our comments and concerns on the potential effects of the project are as follows.

1. **Impact of construction on our customer experience.** As our store sits immediately adjacent to the highway, we anticipate being adversely affected by noise and dust, dewatering and excavation. We would appreciate specific information at least 90 days in advance on specific construction scheduling including dates and time of day as well as methods proposed to minimize impact.
2. **Impact on traffic during construction.** We would be concerned with any restriction of traffic flow Koko Head bound turning left from Farrington Highway onto Leoku Street which serves our complex. Our store is also directly accessed through a right turn entrance off of the highway, Ewa bound which is our main entrance and must remain unobstructed throughout the process. The highway is already heavily congested during early morning and mid afternoon hours and we expect that construction will further impede customer access to our store, extend our employees' commute and delay deliveries. Advanced information on proposed traffic flow during the various stages of construction would be beneficial.
3. **Availability of parking.** We understand that the Waipahu station will include parking on the makai side of Farrington Highway which is currently occupied by a car lot. We are concerned that unless adequate stalls are available, rail passengers are likely to overflow into our complex's parking lot. Westbound rail

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Zippy's

passengers in particular, would be likely to attempt this as the step down for the elevated station lands on our side of the highway. Specifics on the station and its parking capacity and overflow contingency plans would be appreciated.

4. **Street Upgrades.** With the opening of the station, we foresee a need to improve the crosswalks across Farrington Highway, particularly those closest to the Leoku Street in consideration for the safety of increased pedestrian traffic moving to and from the station landings. Employees in the area and customers using the rail will also increase the traffic on these crosswalks.
5. **Store Visibility.** Dependent on the height of the rail and the placement of the support columns, we are concerned of the visibility of our restaurant and its signage from the eastbound lanes and from across the highway. We would be interested in how this circumstance may be addressed.
6. **RPT Considerations.** We would be interested in any adjustments the county is considering for real property taxes for those areas immediately impacted by construction. In addition, we'd like to know what mechanisms might be instituted to require "pass through" of any related savings from landlord to tenant.

In general, timely communication of the final plans for construction and information on the operation of the rail transit system would be crucial for our store, our patrons and neighbors along the route. We intend to be proactive and prepare ourselves for the temporary disruptions brought by construction, and more importantly to evolve our products and services as customer habits and the business landscape change with the introduction of rail service.

While we have listed our major concerns, please be assured that we also appreciate the many benefits and opportunities development of rail transit will bring to our island. Please feel free to contact me directly if you require further clarification on any of the above.

Sincerely,

Paul S. Yokota
Chief Operating Officer

cc: Robinson Estate

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DEPARTMENT OF TRANSPORTATION SERVICES

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010 RT10/09-298449R

Mr. Paul S. Yokota, Chief Operating Officer
FCH Enterprises
1765 South King Street
Honolulu, Hawaii 96826

Dear Mr. Yokota:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal for Zippy's Waipahu, 94-180 Farrington Highway:

Your comments will be addressed in the same manner as submitted.

1. *Construction*

Section 4.18.1 of the Final EIS discusses the effects construction will have on businesses. Communication and coordination with businesses will occur throughout the construction period. Access to businesses near construction activities could be temporarily affected, but access will be maintained.

The contractor will be given parameters, such as the number of lanes that may be closed and the procedures for closures, and will develop a Maintenance of Traffic (MOT) Plan that must be reviewed and approved by the City and/or the Hawaii Department of Transportation (HDOT).

Proposed mitigation may include the following:

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turns at signalized intersections along Farrington Highway will remain upon completion of the fixed guideway system.

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Higher volumes of pedestrians and bicycles are expected near stations. DTS will work with other City departments and HDOT to identify and improve key pedestrian and bicycle routes to stations and to improve overall safety and accessibility near station entrances. All stations will have security lighting.

3. Availability of Parking

The Waipahu and West Loch Stations are not planned to have park-and-ride facilities. As noted in Section 3.4.4 of the Final EIS, station areas with the highest estimated demands for spillover parking are at West Loch, Pearlridge, Iwilei, and Ala Moana Center. Section 3.4.7 of the Final EIS states that the City will consider strategies in coordination with appropriate stakeholders to mitigate for any loss of parking supply and for increased demand from spillover parking near stations.

4. Street Upgrades

The nearby West Loch Station will have a concourse connecting both train platforms to entrances on each side of Farrington Highway. Therefore, it will not be necessary for transit patrons to cross the highway at-grade. However, over time there could be increased pedestrian traffic around station areas. It is expected that pedestrians in this area will use the existing signalized crosswalk at Leoku Street.

5. Store visibility

Store signage that is below the elevation of the guideway will be visible under the guideway to travelers on Farrington Highway. Signage may also be visible from the guideway itself.

6. RPT considerations

The City has not proposed any property tax rate changes or credits associated with construction of the Project.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

FROM :

FAX NO. :

STEVEN FEKETE
PH 942 1466
430 Keoniana St. Apt 313
Hon. HI 96815

TO THE MAYOR

Phoenix rail lesson

Phoenix just opened a new 20-mile light-rail system, built for $1.4 billion.

Why does our government project $5.3 billion for our 20-mile system? Are the Phoenicians that much smarter than us to elect a government that provides them with the same length system for almost $4 billion less? Wow!

What could we taxpayers do with $4 billion in our own pockets? Think about it. Perhaps for the billion-dollar required sewage upgrade, to "keep Honolulu from bankruptcy" as Mayor Mufi so ominously declared, and still have a few billion left?

Gerhard C. Hamm
Waialae Iki

BUT AGAIN, SOMEONE HAS TO PAY TO THE REELECTION OF OUR POLITICIANS !! BUT 4 BILLIONS ?? WELL THAT'S HAWAII.

AR00001747

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT1/09-295994R

Mr. Steven Fekete
430 Keoniana Street, Apt. 313
Honolulu, Hawaii 96815

Dear Mr. Fekete:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraph addresses your comments regarding the above-referenced submittal:

The conditions between Phoenix and Honolulu are different. The systems are both 20 miles long, but the Phoenix line is estimated to carry less than half the riders of the Honolulu system and take more than twice as long to travel the 20 miles. Moreover, the Phoenix line removes two lanes of traffic along most of the route. There are numerous alternative routes available for motorists in the Phoenix metro area. The Honolulu Project will not remove any travel lanes. It will add to the capacity of the overall transportation system without reducing the existing, limited roadway supply. Phoenix did not need to preserve highway capacity; Honolulu must. To accomplish that, the system must be elevated (underground is more expensive). The cost of an elevated system is higher than an at-grade line such as the recently opened system in Phoenix, but the Honolulu system will have a much higher capacity and will be more reliable.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

RT/09-297328

1/26/09

DTS
RAPID TRANSIT

Re: Rail System

I've had many questions regarding the rail system. Whenever I've heard Mufi speak about this system, he's never addressed my concerns and articles in the newspapers haven't either.

Finally, some of my concerns have been addressed in the brochure "Honolulu on the Move." I now know it does run on electricity + plans of what to do if we have power outage. Prolonged outages were also addressed.

However, if that happens there will be no air condition! How will people react being above ground when that happens + the train stops between stations? How are you going to get them to safety? There will be senior people, pregnant women (some with children) wheelchair riders not to mention other handicapped riders.

Finally, will there be a security person riding each train in case of incidents? Will there also be security at each station so robberies + attacks of any kinds can be handled? Some riders will have to ride early in the

(over)

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morning + late in the evening due to their jobs.

These questions have never been answered either in the papers, on television, or in one of Mufi's many appearances!

I was born + raised in Hawaii + don't drive. I have been a bus rider since I was 8 years old and am now a retired senior citizen of sixty-six. We are lucky to have an excellent bus system, the best in the County!

I will never ride the rail system as the route will not be in the Makiki area. Perhaps my concerns stem from the fact that I am highly claustrophobic. The thought of being trapped above ground with no air-conditioning frightens me. Thank God for this bus system. More people should leave their cars at home + ride The Bus to relieve the traffic mess. Parents now-days indulge their children with a car; I know some families give each child a car on their 16th birthday. What a traffic mess we have on our hands.

More islanders should use the bus! You can sleep, read, listen to music, do crossword puzzles or just enjoy the ride! I see so many problems happening with the Rail System including money spent during this hard time!! Stephanie R. Ferreira

AR00001751

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010 RT1/09-297328R

Ms. Stephanie Fernandes
1551 Wilder Avenue
Apartment 4
Honolulu, Hawaii 96822

Dear Ms. Fernandes:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

Since trains and rail stations will be electrically powered, the system's infrastructure is being designed to handle service disruptions. For example, trains will draw power from many points along the route, so an outage in a few areas should not disrupt service for the system overall.

If electrical power is lost system-wide, then train brakes are designed to stop the rail cars even without power. Lights will stay on in trains and stations; backup batteries will provide lighting for several hours. The train operations center will communicate with passengers via the public address system and intercom to provide guidance.

If power is restored within a short time, service will resume. With a prolonged outage, the operations center will direct passengers to exit the trains and walk along a lighted emergency walkway on the guideway to the nearest station. For those unable to exit rail cars, such as the groups referenced in your letter, help will be provided by emergency responders and transit staff. Passengers will be met at the train station by a coordinated response from emergency responders and city transportation workers. There will be no air conditioning during power outages.

As discussed in the Final EIS Section 2.5.4 Safety and Security Measures, a project-specific Safety and Security Management Plan has been developed in accordance with FTA requirements to define the safety and security activities and methods for identifying, evaluating, and resolving potential safety hazards and security vulnerabilities of the system. It establishes responsibility and accountability for safety and security during the Preliminary Engineering, Final Design, construction, testing, and start-up phases of the Project. The Honolulu Police Department, the Honolulu Fire Department, the Honolulu Department of Emergency Management, and the Honolulu Emergency Services Department have been involved in preparing and will be part of implementing the plan. The plan addresses public safety and security concerns, including threats and hazards associated with the Project, specific issues that were identified through community outreach efforts, and design and architectural details to enhance safety.

Lastly, your comments regarding TheBus have been noted. Bus service will continue to support the rail system.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

1127 Wanaka St. Honolulu, HI 96818

December 9, 2008

Honolulu Hale
530 S. King Street Honolulu, HI 96813

Dear Mufi Hannemann,

The rail system may reduce traffic in the future, and may allow it to build high-density, affordable homes so the children and grandchildren will have a place to live within walking distance of a rail stop, but if you think about it, it is going to cost the Oahu people a whole lot of money.

The city will have to figure out where to get the millions of dollars it will cost to maintain the system. It looks like we're going to pay a lot more in excise and property taxes. The number of people using the system will be minimal. We're going spend billions of taxpayer dollars on a system that will be used by only a small part of the population. Traffic will still be bad and we'll all have to deal with worse traffic while they build the system. Another thing is public has until January 7th for a 400 pages report which is approximately one month from now. There are two big holidays coming up, even the most prepared would find responding thoughtfully a severe burden. With these busy events coming up, it would make the traffic worst.

I do hope that you would understand my opinion. The rail is a great system that would make our life easier but it's just really not necessary for system that's taking more space in Oahu that a small part of population will be using. I would like to here what you have to say so please write back.

Sincerely,

Eddielyn Fernandez

Student of Moanalua High School

AR00001754

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

May 21, 2010 RT12/08-292228R

Ms. Eddielyn Fernandez
1127 Wanaka Street
Honolulu, Hawaii 96818

Dear Ms. Fernandez:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address comments regarding the above-referenced submittal:

As stated in Section 3.2.1 of the Final EIS, ridership projections for the forecast year of 2030 have been developed using the travel demand model, which was calibrated and validated to current year conditions. The model is based upon a set of realistic input assumptions regarding land use and demographic changes between now and 2030 and expected transportation levels-of-service on both the highway and public transit system. Based upon the model and these key input assumptions, approximately 116,000 trips per day are expected to use the rapid transit system on an average weekday in 2030. Since the Draft EIS was published, the travel demand model has been refined by adding an updated air passenger model, defining more realistic drive access modes to project stations, and recognizing a more robust off-peak non-home-based direct-demand element based on travel surveys in Honolulu.

Chapter 6 of the Final EIS discusses funding sources for the capital costs and the ongoing operating and maintenance costs of the Project. City funding for the capital cost of implementing the Project is expected to come from the 0.5 percent General Excise and Use Tax

surcharge. This surcharge has been in place since January 1, 2007, and will expire December 31, 2022. City funding for transit operating and maintenance costs comes from the General and Highway Funds, which receive revenue from a variety of currently existing taxes. Whether any of these taxes will be raised in the future will be decided as part of the City's annual budget process and would most likely be decided on a variety of issues, not just transit costs. Fixed guideway operating costs will represent between 2 and 3 percent of the City's annual operating budget.

Regarding whether the Project is needed and who will use the system, no other option that has been studied has been able to function as effectively based on the criteria upon which the system was selected (i.e., mobility, support of future land use plans, equity, and reliability). More specifically, projections are that 116,000 people will use the Project each day. That is about the equivalent of half the traffic on the H-1 Freeway. If necessary, the Project can handle many more riders than that by reducing headways or adding additional trains.

The system is built in the median of major roadways and, accordingly, it will not take away from existing travel lanes on the roads once in operation; therefore, all the added capacity is new. As shown in Table 3-14, roadway congestion (as measured by vehicle hours of delay) will decrease 18 percent with the Project compared to without.

The exact impact of construction activity on traffic is not yet known. As discussed in Section 3.5.7 of the Final EIS, a Maintenance of Traffic (MOT) Plan will be developed in advance by the contractor with approval from the City and the Hawaii Department of Transportation. The MOT Plan will identify measures to mitigate temporary construction-related effects on transportation and will address roadway closures for streets identified in Table 3-27 of the Final EIS. As stated in Section 4.18.1 of the Final EIS, several public involvement strategies will be used to inform businesses and the public about construction activities, including roadway detours.

Lastly, in response to concerns about the length of the review period, the deadline for comments on the Draft EIS was extended from January 7 to February 6, 2009.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Issuance of the Record of Decision under NEPA and acceptance of the Final EIS by the Governor of the State of Hawaii are the next anticipated actions and will conclude the environmental review process for this Project.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

700 Richards Street, #2103
Honolulu, HI 96813-4621
25 November 2008

539

Mr. Wayne Y. Yoshioka, Director
Dept. of Transportation Services
City and County of Honolulu
650 South King Street, 3rd Flr
Honolulu, HI96813

SUBJECT: HONOLULU HIGH CAPACITY TRANSIT CORRIDOR PROJECT

RE: 10 REASONS WHY A TRANSIT STOP IS NOT NEEDED AT THE AIRPORT

The following is for your consideration:

1. Most people arriving here by plane are tourists on tour packages; as such, both they and their luggage are transported between the airport and their hotel by the tour operator. Since most hotels for tourists are in Waikiki, the transit system will be of no use to get them from the airport to Waikiki since it terminates at Ala Moana Center.

2. Many visitors from the Orient arrive in the early hours of the morning; consequently, their hotel room is not available until after 2:00 PM. Therefore they are taken on tour buses to visit various locations on the island then delivered to the hotel at the time they can be registered and given a room.

3. People not on tours, after deplaning must go to baggage claim to retrieve their luggage. After getting their luggage, they can not go back into the terminal. Consequently, to use the transit system, they will have to find their way with their luggage to the transit stop. From the diagram in The Advertiser showing only one transit stop, getting there from baggage claim area will be very difficult, especially for the elderly or handicapped.

4. For any traveler with luggage using the transit system for transportation to

their residence will have the problem of getting from a transit station to their residence. Again a challenge for the elderly or physically disabled.

5. Conversely, people wanting to go to the airport will have the problem of getting themselves and their luggage to a transit stop. For the elderly and physically challenged this may be insurmountable.

6. Arriving at the airport, getting from the transit stop to a ticketing area of the terminal will be another challenge since airline ticketing is spread from one end of the terminal to the other, most of which will not be near the transit stop. This will be especially true for inter-island travelers.

7. Flight crews are transported between the airport and their hotel by ground transportation provided by the airline for which they work. Again since most of them are billeted in Waikiki, the transit system will be of no use to them.

8. Other workers in the vicinity of the airport live all over the island, many no anywhere near the transit line. Getting to and from work, the transit system will be of little use to them.

9. If such workers were to use the stop at the airport, they will then have the problem of getting from there to their work place which may not be nearby.

10. All of these reasons will work to deter people from using the transit syster for transportation to and from the airport. Most people will continue to do exactly what they do now, take a taxi, shuttle service or private automobile to and from the airport to be delivered to the ticketing area for their departing airline, picked up at baggage claim for transportation to their residence or going to and from their work place.

Lastly, have you thought of the absurdity of passengers getting off an airplane after an 8-9 hour flight, getting on a train to go to Ala Moana Center? Get REAL!!

Sincerely yours,

Charles M. Ferrell

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, 3RD FLOOR
HONOLULU, HAWAII 96813
Phone: (808) 768-8305 • Fax: (808) 768-4730 • Internet: www.honolulu.gov

MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-335134

Mr. Charles M. Ferrell
700 Richards Street, #2103
Honolulu, Hawaii 96813-4621

Dear Mr. Ferrell:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal in the same manner presented:

1. and 2. Your comments regarding visitor use of the fixed guideway system have been noted. The Airport Alternative primarily serves major employment destinations. Visitor use accounts for a smaller percentage of ridership on this alternative. Of the 116,000 daily fixed guideway boardings, approximately 1,800 will be visitors traveling to or from the Airport. Approximately 8,100 daily fixed guideway boardings will be made by visitors for other uses, such as shopping or visiting sites of interest.

3. The Airport Station is about 800 feet from the Interisland Terminal and about 600 feet from the Overseas Terminal. Pedestrian paths will be constructed by the Project that will connect the overseas Terminal to the concourse level of the rail station. All station facilities,

including access routes to the station from the airport terminals, will conform to applicable Americans with Disabilities Act (ADA) and local regulations.

4. and 5. Tourists may use rail to transport luggage. Other modes of transportation that currently exist are other options. Fixed guideway riders have several options available to travel to and from the rail system. As noted in Section 2.5.6 of the Final EIS, bus service will be enhanced and the bus network will be modified to coordinate with the fixed guideway system. There will also be coordinated transfers between the fixed guideway system and the bus, which will minimize wait times. In addition, as stated in Section 3.4.2 of the Final EIS, sidewalks and crosswalks will be available at all station areas and all station facilities will comply with applicable ADA and local regulations.

6. As stated previously, the Airport Station for the fixed guideway will not be significantly farther from the terminals than the existing parking garage.

7. Your comment regarding flight crews has been noted.

8. and 9. Workers will have several options available when traveling to or from the fixed guideway system. As mentioned above, the bus service will be enhanced to coordinate with the fixed guideway system, thus minimizing wait times when transferring. Bicycle parking will be allowed at all stations, and bicycles will be allowed on the train as regulated by a bicycle policy. Park-and-ride facilities will be located at East Kapolei, UH West Oahu, Pearl Highlands, and Aloha Stadium, allowing people to drive to access the system. Lastly, stations will have spaces for passenger drop off (kiss-and-ride).

10. The Airport Alternative will primarily serve major employment destinations, such as Pearl Harbor Naval Base. Visitor travel to and from the Airport accounts for a smaller percentage of daily ridership on this alignment. The Project is but one of many transportation choices visitors and residents will have available to them.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

298692

Mr. Wayne Yoshioka
Director Department of Transportation Services
City and County of Honolulu
650 South King St. 3rd Floor
Honolulu
HI 96813

CC Mr. Ted Matley
FTA Region IX
201 Mission St. Suite 1650
San Francisco, CA 94105

CC Governor Linda Lingle
Hawaii State Capitol
415 S Beretania St. 5th Floor
Honolulu, HI 96813
CC City Council Members

Dear Sir or Madam:

Feb 5, 2009

I have read the Executive Summary of the DEIS on the proposed $4.7 billion rail project and I have a few questions. As someone who will never live long enough to see it built, would not ride it anyway, and knows no one who will; I am most concerned about its cost and its effect upon our economy. The advocates of the rail project used my tax dollars to buy votes with one-sided ads that claimed this project would create jobs and help the economy. My questions are:

1. If cost estimates are exceeded (as everyone on Earth expects) or if ridership revenues are less than expected (another certainty), where will the government (city or state) get the money?
2. If you are going to tax the non-riders so that the riders can pay less and be subsidized, will you tax other non-users (i.e. the entire state) as well or will you just tax those that can't escape?
3. If it becomes obvious that rail will not create jobs, pay for itself, be affordable, or solve our traffic problems, can this project be terminated and the existing columns and pillars be converted to tombstones for the politicians responsible for this mess?

Sincerely,

William H. Follmer

William H. Follmer
99-1647 Aiea Heights Drive
Aiea Hi 96701

RECEIVED
2009 FEB 6 P12:32
DEPT OF TRANSPORTATION HONOLULU

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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Phone: (808) 768-8305 • Fax: (808) 768-4730 • Internet: www.honolulu.gov

MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

May 21, 2010

RT2/09-298692R

Mr. William H. Follmer
99-1647 Aiea Heights Drive
Aiea, Hawaii 96701

Dear Mr. Follmer:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address comments regarding the above-referenced submittal:

Your comments will be addressed in the same manner as submitted.

1. Both ridership and financial discussions in the Final EIS address concerns about the uncertainties associated with ridership and financial markets. Section 6.3 of the Final EIS describes the funding sources anticipated to be used to pay for the capital costs of the Project and takes into account the current economic downturn. Capital costs of the Project, including finance charges, are expected to be fully paid for by a combination of FTA Section 5309 New Starts Funds and FTA Section 5307 Funds from the Federal government and revenues from the County General Excise and Use Tax (GET) surcharge levied from 2007 through 2022. Section 6.6 of the Final EIS

discusses the risks and uncertainties associated with the funding and other sources of revenue that could be used if needed.

In addition, Section 6.4 of the Final EIS describes the funding sources to pay for ongoing operating and maintenance costs associated with maintaining the resulting transit system in a state of good repair. Operating and maintenance costs will be paid for from the same sources currently used for TheBus: Federal funding, fare revenues, and subsidies from the City's General and Highway Funds. Funding for guideway maintenance will be covered in the City's annual budgeting process and amounts to between 2 and 3 percent of the City's annual operating budget.

Ridership projections for the forecast year of 2030 have been developed using the travel demand model used by the Oahu Metropolitan Planning Organization (OahuMPO) for the Oahu Regional Transportation Plan (ORTP), which was calibrated and validated to current year conditions. The model is based upon a set of realistic input assumptions regarding land use and demographic changes between now and 2030 and expected transportation levels-of-service on both the highway and public transit system. OahuMPO undergoes model updates every five years to reflect land use and transportation network changes. The model is approved by the OahuMPO Technical Advisory Committee. Based upon the model and these key input assumptions, approximately 116,000 trips per day are expected to use rapid transit system on an average weekday in 2030. Since the Draft EIS was published, the travel demand model has been refined by adding an updated air passenger model, defining more realistic drive access modes to project stations, and recognizing a more robust off-peak non-home-based direct-demand element based on travel surveys in Honolulu.

The Project is one of the first in the country to design and undertake an uncertainty analysis of this type of travel forecast. An uncertainty analysis evaluates the variability of the forecast by establishing probabilistic upper and lower limits of ridership projections. FTA has worked closely with the City during this effort. A variety of factors were considered in the uncertainty analysis. Given all the factors considered, the anticipated limits for guideway ridership in 2030 is expected to be between 105,000 to 130,000 trips per day, bracketing the official forecast of 116,000 riders a day used for all calculations.

2. Funding sources for the Project, including allowance for contingencies, are documented in Chapter 6 of the Final EIS. The primary funding source for capital costs is the County's GET surcharge, which applies to Oahu only.

3. Overall, the Project is projected to increase jobs during the nine years of construction to 7,500 in total (see Table 4-34 in the Final EIS). The financial plan is balanced for the entire Project so there will not be a situation in which only a portion of the system will be built. If there is a shortfall, additional revenue sources will be considered. Section 6.6 of the Final EIS discusses risks and uncertainties, as well as potential sources to cover shortfalls. Islandwide congestion (as measured by vehicle hours of delay) will decrease 18 percent with the Project compared to the No Build

Alternative (see Table 3-14 of the Final EIS). Column size and location make them impractical for use as tombstones.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Issuance of the Record of Decision under NEPA and acceptance of the Final EIS by the Governor of the State of Hawaii are the next anticipated actions and will conclude the environmental review process for this Project.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

588

FORD ISLAND PROPERTIES, LLC
737 Bishop Street, Mauka Tower, Suite 2750 · Honolulu, Hawaii 96813 · 808 585-7900 · FAX 808 585-7910

January 29, 2009

Mr. Wayne Y. Yoshioka, Director
Department of Transportation Services
650 South King Street, 3rd Floor
Honolulu, Hawai`i 96813

Draft Environmental Impact Statement, Honolulu High-Capacity Transit Corridor Project, Island of O`ahu

Dear Mr. Yoshioka,

Thank you for the opportunity to review and comment on the above document. Ford Island Properties LLC ("FIP") presently controls several properties in the `Ewa District that likely will be impacted by the proposed transit corridor project. FIP leases from the United States Navy the 400 acre residential area along the `Ewa coastline known as the Waterfront at Pu'uloa (formerly the Iroquois Point Naval Housing area), which contains 1, 461 single-family and townhome residential dwellings. In addition, FIP recently negotiated the lease of approximately 498 acres of property situated along Roosevelt Avenue within Kalaeloa (formerly known as Naval Air Station Barbers Point). FIP owns an additional 53 acres of land in Kalaeloa, adjacent to the abovementioned 498 acres. In total FIP controls ±550 acres of land in Kalaeloa. FIP's Kalaeloa properties currently comprise a mix of vacant land, occupied buildings and older vacant buildings. FIP acquired its leasehold interest in the Kalaeloa lands for their potential for redevelopment to higher and better uses.

As a landowner/lessee with a significant property interest in the `Ewa region, we offer the following comments.

1. We note that the Draft EIS identifies the preferred alternative as a transit corridor extending from East Kapolei to the University of Hawai`i at Manoa. However, Figure 2-5 indicates a planned extension of the transit corridor linking the proposed East Kapolei Transit Station to an eventual transit station in West Kapolei near Kalaeloa Boulevard. Figure 2-5 depicts the alignment of the planned extension in a manner that is generally consistent with the transit route alignment depicted in the aforementioned Kalaeloa Master Plan. We note that the proposed planned extension through Kalaeloa, as shown in the current Draft EIS, could impact the development potential of approximately ten (10) parcels of FIP's lands in Kalaeloa. As such, while we recognize that the planned extension is beyond the scope of the Draft EIS, we respectfully request that FIP be included in any discussions concerning the eventual implementation of the planned extension as it may have a significant impact upon FIP's Kalaeloa properties.

2. As a landowner and lessee in the Kalaeloa area, we wish to point out that Kalaeloa will eventually emerge as a significant development area in the `Ewa region, and as such, should be referenced and acknowledged in transit planning. While the text on page 2-14

acknowledges that the proposed East Kapolei transit station will serve local and express transit commuters from 'Ewa, 'Ewa Beach, Kapolei and Kalaeloa, we note a general omission and/or inaccuracy among the figures in the Draft EIS with regard to its references to Kalaeloa. Figure 1-3 includes the labels "Kapolei, Kalaeloa, 'Ewa, and Ewa Beach. Figure 1-4, entitled Major Activity Centers, identifies "Kalaeloa Industrial Park" as site number 5 and locates it roughly in the area where Fort Barrette Road enters Kalaeloa and intersects with Roosevelt Avenue and Saratoga Road. However, we are not aware of any existing or planned development called the Kalaeloa Industrial Park in this region. Figures 1-5, 1-6, 2-5, 4-14 and 4-39 only reference Kapolei and 'Ewa. Figure 2-38 references Kapolei, East Kapolei, 'Ewa and 'Ewa Beach. Figure 3-7 references Kapolei and Ewa. Figure 4-2, which identifies land uses in the region, depicts no industrial land use in the location of the Kalaeloa Industrial Park identified in Figure 1-4. Figure 4-3 only references East Kapolei. Figure 4-43 references Kapolei, 'Ewa, and 'Ewa Beach. We request that the various figures be corrected to accurately and uniformly reference major place names in the 'Ewa region, including Kalaeloa.

Again, thank you for the opportunity to comment on the Draft EIS. We look forward to receiving a copy of the Final EIS upon its completion. Should you have any questions regarding our comments, please contact me at (808) 585-7900.

Very truly yours,
Ford Island Properties, LLC

Steve Colón
Vice President

Cc: Mr. Ted Matley
FTA Region IX
201 Mission Street, Suite 1650
San Francisco, CA 94105
(415) 744-3133

Office of Environmental Quality Control
235 S. Beretania St., Suite 702
Honolulu, Hawaii 96813
(808) 768-8303

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09 JAN 30 P12:16
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TRANSPORTATION SERVICES

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT1/09-297502R

Mr. Steve Colon, Vice President
Ford Island Properties, LLC
737 Bishop Street
Mauka Tower, Suite 2750
Honolulu, Hawaii 96813

Dear Mr. Colon:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraph addresses your comments regarding the above-referenced submittal:

While the study corridor included in the Draft and Final EISs extends from Kapolei to UH Manoa and Waikiki, the Project includes the construction of a fixed guideway system from East Kapolei to Ala Moana Center via the Airport. The Project has logical termini and independent utility from any extensions that may be constructed in the future. The future extensions to East Kapolei, Salt Lake Boulevard, Waikiki, and UH Manoa are discussed in the cumulative impacts sections of Chapters 3 and 4 of the Final EIS. The future extensions are not part of the Project; thus, they are not required to be evaluated under Chapter 343 of the Hawaii Revised Statutes and NEPA. Under NEPA, environmental analysis is only required when there is a proposed action by a Federal agency. Here, because the future extensions are not proposed for

implementation at this time they are not part of the Project studied in the Final EIS. It would be premature to undertake an environmental analysis of the extensions (beyond the cumulative impacts analysis) because they are not part of the proposed action to be taken by the City and FTA. If the future extensions are proposed for implementation at some time in the future, environmental analysis of the extensions and appropriate alternatives will be undertaken at that time. Ford Island properties would be consulted when the extensions are evaluated.

In addition, maps have been clarified in the Final EIS. For maps that pertain only to the Project rather than the entire study corridor, detail has not been added for Kalaeloa. The label in Figure 1-4 has been revised to say "Kalaeloa."

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

C 70102

Gregory Foret
P.O. Box 490
Waialua, HI 96791
Tel: 808 637-9887
brgregory@hawaiipredictions.org

RECEIVED
FEB 12 P2:32

February 4, 2009

Mr. Wayne Yoshioka
Director Dept. of Trans. Services
City & County of Honolulu.
650 S King Street
Honolulu, HI 96813

Dear Mr. Yoshioka,

Thank you and the project team for sending me a copy of the Draft Environmental Impact Statement for the High Capacity Transit Corridor Project and inviting me to submit comments about it. As one who has had some studies in landscape architecture and urban planning while in college just over 30 years ago, and having an ongoing interest in public transportation planning it is appreciated. I was not able to read the entire document thoroughly and will not be able to comment as much as I wish so I will try to be brief on the topics I want to comment and suggest the most.

I commend the planners and those who prepared the document for a very thorough comprehensive and well balanced study. Well done.

Page 4-93: Mitigation: I hope an architect would be involved to help blend the station design at China Town and Downtown. Also to soften the effects where straddle beam construction such as shown on 4-84.

Page 4-101: Noise Impact Mitigation: I did not find any indication of how fast the trains would be operating in the areas identified as having moderate noise impact. From the maps I figure that as many of those areas are in a highly urban area, in close proximity to a station, the trains will normally be operating slower than in the more open western portions of the route. I anticipate that in the Kukaako area (curves) and Pearl Highland area (Station and curve) the trains may be averaging only 30 mph or less. If noise is still a problem at those speeds, may have to consider higher noise reducing baffles along to side of the guideway that faces the high rises in close proximity.

Maintenance/Storage area: My preference is for the spot between Waipahu and Leeward Comm. College. It is a more central location for more efficient staging of trains. The Hoopili site has extra non-revenue trackage required to access it and two crossings of Farrington Hwy. The eastern crossing looks awkward visually because of the acute angle of crossing.

Plans and Profiles in Appendix A: I understand there is a master plan already for the development of Hoopili and the East Kapolei area. It would be very helpful to show what the adjacent street patterns alongside and under the guideway would be like. Otherwise having an elevated guideway in an open undeveloped area would not make sense. The ROW could be fenced off and any roads needing to cross would go over the track by overpass.

Construction Phasing: Page 2-39, 2-40: For an opening segment, it is best to have a segment long enough and serving enough residences and businesses to encourage use and appear useful. This encourages continued public support. I would consider a West loch to Aloha Stadium to be a superior opening segment than the Kapolei to Pearl Highlands segment, even though the opening date may be later. Having the maintenance area by Leeward Comm. College, and crossovers already planned near the West Loch and

Aloha Stadium stations would allow this. While creating a spur and incentive for developing of East Kapolei is a goal of the project, I see moving people between three communities, (Aiea, Pearl City, Waipahu) with a stadium and and shopping center to be a bigger priority. I do not see what the big hurry is for about doing East Kapolei first. It can wait. The projected transit oriented development will be slow to take place until the route gets past Pearl City or reaches West Kapolei.

Finally, even though The city council has already chosen the Airport Alternative and I was not able to attend the earlier public presentations of the alternatives, I wanted to be on record as preferring the Salt Lake Alternative. It is based on the lower overall cost and the presence of the high density residential area there. Such a route will greatly improve public transportation service between Salt Lake and Aiea and points west which currently is slow and indirect. I am somewhat skeptical of the extent military areas creating transit demand as employment centers when Hickam will not be directly served and most of the Pearl Harbor employment areas are a long walk or require a connecting shuttle. I thought the Salt Lake Alternative suffered from having only one station of its own along its stretch. I wonder, if a station is being planned for the Lagoon Dr area, why could there not be a station close to Puuloa Rd serving that industrial area plus a neighborhood close by. I would also have moved the Aloha Stadium station closer to Halawa Stream on the south edge of the parking area to strike a balance of serving the residential area along Halawa Stream and the Stadium Marketplace businesses as well as the stadium. The waking distance from the park and ride lot would not be much longer than next to the stadium, and connecting busses have a better route to Ahuimanu and Halawa neighborhoods. These would have increased ridership.

While living and working in Waialua means that I will be using the trains only seldom, I am looking forward to the project's implementation.

Sincerely yours,

Gregory Foret

Gregory Foret

AR00001770

DEPARTMENT OF TRANSPORTATION SERVICES

MUFI HANNEMANN
MAYOR

CITY AND COUNTY OF HONOLULU

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WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT2/09-298702R

Mr. Gregory Foret
P.O. Box 490
Waialua, Hawaii 96791

Dear Mr. Foret:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

Your comments will be addressed in the same manner as submitted.

Comment regarding page 4-93 of the Draft EIS: As part of Final Design, DTS developed design criteria to address the City and County of Honolulu's requirements for the Project. In addition, the ongoing station area planning process involves numerous aspects of transit system design. The process addresses design and planning issues in an integrated manner and focuses on the characteristics and preferences of the communities adjacent to each station. Guideway and column materials and surface textures, including straddle-bents, will be selected in accordance with generally accepted architectural principles to achieve effected integration between the guideway and its surrounding environment. Architects will be among the team members working on the Final Design.

Comment regarding page 4-101 of the Draft EIS: Noise levels were modeled with the train at the top run speed proposed between stations: 45 miles per hour (mph) for stations less

than one-half mile apart, 50 mph for stations between one-half mile and 1 mile apart, and 55 mph for stations 1 or more miles apart. Noise levels may be less in areas where the train speed is slower, such as near stations and curves. The approach taken in the Final EIS is a conservative one so that all potential impacts are considered.

Comment regarding maintenance/storage area of the Draft EIS: As described in Section 2.5.8 of the Final EIS, the site near Leeward Community College has been identified as the preferred location for the maintenance and storage facility.

Comment regarding plans and profiles in Appendix A of the Draft EIS: At this time, developments in East Kapolei and Hoopili are speculative since they have not been zoned, subdivided, permitted, or undergone right-of-way acquisitions. Accordingly, their roadway networks will not be incorporated in Appendix A of the Final EIS. At-grade operation with roadway overpasses would be possible in the East Kapolei and Hoopili area; however, it would result in substantially less usable land and disrupt future connectivity.

Comment regarding construction phasing: As described in Section 2.5.10 of the Final EIS, to support phased opening of the system, the first construction phase must be connected to a maintenance and storage facility, which requires considerable land. The first phase of the Project must be connected to the maintenance and storage facility because, in addition to maintenance of equipment and ongoing operations, the maintenance and storage facility houses the main control center for the entire Project and the required testing and operation of the system could not be completed without access to it. No location has been identified closer to Downtown with sufficient available land to construct a maintenance and storage facility. The Project will be constructed in phases to accomplish the following:

- *Match the anticipated schedule for right-of-way acquisition and utility relocations*
- *Reduce the time that each area will experience traffic and community disturbances*
- *Allow for multiple construction contracts with smaller contract size to promote more competitive bidding*
- *Match the rate of construction to what can be maintained with local workforce and resources*
- *Balance expenditure of funds to minimize borrowing*

The portion of the corridor Ewa of Pearl Highlands is less developed than the areas Koko Head. Right-of-way can be obtained more quickly; therefore, overall project construction can begin earlier, resulting in lower total construction costs. Construction is planned to continue uninterrupted Koko Head from Pearl Highlands to Aloha Stadium, then Kalihi, and finally to Ala Moana Center.

Your preference for the Salt Lake Alternative has been noted. While each of the alternatives discussed in the Draft EIS includes trade-offs between benefits and impacts, the Airport Alternative from East Kapolei to Ala Moana has been identified as the Preferred Alternative as described above. Compared to the other alternatives discussed in the Draft EIS, the Airport Alternative will carry the most passengers, provide the greatest transit-user benefits, and result in the fewest vehicle hours of delay. It will provide access to employment centers at Pearl Harbor Naval Base and Honolulu International Airport and will serve the Salt Lake neighborhood with connecting bus service. Of the three Build Alternatives addressed in the Draft EIS, the Airport Alternative will have slightly lower impacts to the natural and built

environment. During the public comment period on the Draft EIS, the public overwhelmingly supported the Airport Alternative. Of the comments that specifically supported one of the alternatives, more than 75 percent were in support of the Airport Alternative.

The Alternatives Analysis phase, which preceded the EIS process, is documented in Chapter 2 of the Final EIS. It evaluated a range of modal and general alignment alternatives, in terms of their costs, benefits, and impacts. The scoping process for the Alternatives Analysis involved a presentation of the viable alternatives to the public and interested public agencies and officials to receive comments on the Purpose and Need, alternatives, and scope of the analysis. Scoping for the EIS followed the FTA process that provides for a culling of alternatives studied in the EIS through an Alternatives Analysis. The scoping process initiated for the Alternatives Analysis included a variety of highway, bus and fixed guideway options for consideration. During the later scoping effort for the EIS, the public was requested to propose alternatives that would satisfy the purpose and need at less cost or with greater effectiveness, less environmental or community impact and to propose alternatives that were not previously studied and eliminated for good cause. The only alternative that emerged that met these criteria was a fixed-guideway alternative following several alternative alignments. All reasonable alternatives that emerged from these processes were ultimately evaluated in the Draft and Final EISs.

Since publication of the Draft EIS, design has been advanced, further analysis has been completed, and information has been added in response to comments on the Draft EIS and agency coordination. The Final EIS discusses the process that was used to select the Preferred Alternative, how comments were considered in the decision-making process, impacts, and mitigation commitments.

The feasibility of a station in the Mapunapuna area was explored. There is a considerable elevation difference between the Salt Lake community and Mapunapuna requiring a 4 percent grade on the alignment crossing Puuloa Road. This is too steep a grade for locating a station. Further, once the 4 percent grade is achieved, the alignment enters a horizontal curve as it crosses Moanalua Stream, which also does not allow for a station. The first location where the horizontal and vertical alignments would permit a station is within Fort Shafter. Here a station is precluded because of military security reasons.

Station placement for the Salt Lake Alternative had considered several trade-offs. The Aloha Stadium Station was located in coordination with the stadium's owner to provide optimal access to the stadium for events and to the park-and-ride and bus users that will comprise the majority of the station's users.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

R712/08-293447

December 29, 2008

Robert Fowler
750 Amana Street #801
Honolulu, HI 96814

Dept of Transportation
650 S. King St. 3rd Fl
Honolulu, HI 96813

To Whom It May Concern:

I am concerned about your ambitious timetable regarding the rail transit system. I believe you should conduct a more in depth study on alternate transit such as elevated toll highway lanes and a more expansive bus system. I am also concerned about burial grounds, historical sites and the loss of pristine views of this island that is too small for a fixed rail system. You have done studies in other counties on their rail systems but it doesn't compare with Honolulu because of our size, were just too small. The future of this island is to move toward a green economy like electric cars because once the rail is built it will continue to draw power and require unwanted maintenance and when the power goes out so does the rail. It seems that Mayor Mufi Hannemann is trying to push this project through before he leaves office and isn't telling us everything about the ultimate costs, so slow down before you jump to the wrong conclusions.

Respectfully,

Copy to: Charles Djou

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT12/08-293447R

Mr. Robert Fowler
750 Amana Street, #801
Honolulu, Hawaii 96814

Dear Mr. Fowler:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

Your comments have been noted. To address your first concern, we would like to direct you to the project schedule, which is illustrated in Figure 2-42 of the Final EIS.

In addition, the Managed Lane and Bus Rapid Transit Alternatives have been previously evaluated and eliminated. In "Chapter 2 of the Alternative Analysis and Chapter 2 of the Final EIS, two options were considered for the Managed Lane Alternative—Two-direction and Reversible. This alternative would have provided a two-lane elevated toll facility between Waipahu and Downtown, with variable pricing strategies to maintain free-flow speeds for transit and high-occupancy vehicles (HOVs)." The Two-direction Option would have served express buses operating in both directions during the entire day. To maintain free-flow speeds in the Two-direction Option, it may have been necessary to charge tolls to manage the number of HOVs using the facility. For the Reversible Option, three-person HOVs would have been

allowed to use the facility for free, while single-occupant and two-person HOVs would have had to pay a toll. The Reversible Option was found to be optimal.

The findings are summarized in Chapter 2 of the Final EIS as follows: The Managed Lane Alternative was evaluated for its ability to meet project goals and objectives related to mobility and accessibility, supporting planned growth and economic development, constructability and cost, community and environmental quality, and planning consistency. While this alternative would have reduced congestion on parallel highways, system-wide traffic congestion would have been similar to the No Build Alternative as a result of increased traffic on arterials trying to access the facility. Total islandwide vehicle hours of delay would have increased with the Managed Lane Alternative compared to the No Build Alternative, indicating an increase in system-wide congestion (Table 2-2, Final EIS).

The Managed Lane Alternative would not have supported planned concentrated future population and employment growth because it would not provide concentrations of transit service that would serve as a nucleus for transit-oriented development. The Managed Lane Alternative would have provided little transit benefit at a high cost. The cost-per-hour of transit-user benefits for the Managed Lane Alternative would have been two to three times higher than that for the Fixed Guideway Alternative. Similar to the TSM Alternative, the Managed Lane Alternative would not have substantially improved service or access to transit for transit-dependent communities. No funding sources were identified for the Managed Lane Alternative. Toll revenues from the Managed Lane Alternative would pay for ongoing operating and maintenance while remaining revenues would be used to repay debt incurred to construct the system.

The Managed Lane Alternative would have generated the greatest amount of air pollution, required the greatest amount of energy for transportation use, and would have resulted in the largest number of transportation noise impacts of all the alternatives evaluated. Because the Managed Lane Alternative would have served a shorter portion of the study corridor, it would have resulted in fewer displacements and would have impacted fewer archaeological, cultural, and historic resources than the Fixed Guideway Alternative. The Managed Lane Alternative would not have affected any farmlands. Visually, the elevated structure would have extended a shorter distance, but it would have been more visually intrusive because its elevated structure, with a typical width of between 36 and 46 feet, would have been much wider than that of the Fixed Guideway Alternative.

After the Alternatives Analysis was completed, several scoping comments were received requesting reconsideration of the Managed Lane Alternative that was considered and rejected during the Alternatives Analysis. Because no new information was provided that would have changed the findings of the Alternatives Analysis regarding the Managed Lane Alternative, it was not included in the Draft EIS for further consideration.

The Transportation Systems Management (TSM) Alternative studied during the Alternatives Analysis increased bus service. The alternative included express bus service that operated as bus rapid transit in existing facilities. Bus frequencies would have been increased during peak periods to provide improved service for work-related trips, particularly from developing areas. The bus fleet was assumed to increase from 525 to 765 buses, and park-and-ride

lots were assumed at West Kapolei, UH West Oahu, Waipio, and Aloha Stadium. The TSM Alternative would have improved transit travel times, but it would have done little to improve corridor mobility and travel reliability. Roadway congestion also would not have been alleviated.

Consultation in compliance with Section 106 of the National Historic Preservation Act continued through development of a Programmatic Agreement during completion of the Final EIS. Because of comments received about Section 106 resources during the Draft EIS comment period, effects to historic resources, including indirect and cumulative effects, were reevaluated. A final finding of effects summary has been presented in Section 4.16 of the Final EIS, and the Section 4(f) analysis presented in Chapter 5 has been updated to reflect these changes. Section 4.15.3 of the Draft EIS indicated that the Project will use a phased approach to identify subsurface archaeological sites and burials. Toward that end, the Project is developing an agreement with the State Historic Preservation Division and other consulting parties to guide that effort and to mitigate potential adverse effects, including visual. In the Final EIS, visual effects of the Project are described in Table 4-9. The effectiveness of rail transit is closely linked to the population density of the area served. As described in Chapter 1 of the Final EIS, the majority of the population on Oahu is located in a narrow corridor, which supports rail transit.

Lastly, according to information provided by the Hawaiian Electric Company (HECO), transportation accounts for 63 percent of Hawaii's imported oil while electrical generation consumes only 30 percent of imported oil. The transit system will allow for a decrease in automobile use, thereby reducing the amount of oil required for transportation while only using about 1 or 2 percent of the existing electrical generating capacity. As discussed in Section 4.11.3 of the Final EIS, the Project will reduce daily transportation energy demand by 3 percent compared to the No Build Alternative. HECO is moving toward renewable energy generation. As that happens, the fixed guideway will also benefit from such new sources of energy.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
Creation Date :	2/6/2009
Creator Affiliation :	
First Name :	David
Last Name :	Friar
Business/Organization :	
Address :	44-141 Hako St #5
Alternative Preference :	
Apt./Suite No. :	
City :	Kaneohe
State :	HI
Zip Code :	96744
Email :	davidfriar@hawaii.rr.com
Telephone :	
Telephone Extension :	
Add to Mailing List :	Both
Submission Method :	Website
Other Submission Method :	
Submission Date :	02/06/2009
Submission Content/Notes :	I am against the rail project. It will be noisy and disruptive, not nearly flexible enough if needs change (unlike buses) and way too expensive at a time when basic services are being cut.

DEPARTMENT OF TRANSPORTATION SERVICES

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010 RT10/09-337452

Mr. David Friar
44-141 Hako Street, #5
Kaneohe, Hawaii 96744

Dear Mr. Friar:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

Your opposition to the Project has been noted. Noise effects from the Project are detailed in Section 4.10 of the Final EIS. The Project will cause no severe noise impacts. Three receptors will experience moderate impacts that will occur on the fifth through ninth floors of residential buildings. The Project includes several features to reduce noise from the system, including an integrated noise-blocking parapet wall at the edge of the guideway structure that extends three feet above the top of the rail and a system specification for vehicles with wheel skirts. Wheel skirts on trains will also increase the benefit of the parapet wall at locations above the elevation of the track. In addition, the use of sound-absorptive material under the tracks in the three areas with moderate impacts will reduce the project noise exposure at upper floors to below the moderate noise impact threshold. With mitigation, the Project will not generate any noise impacts.

Chapter 3 of the Final EIS states that adding substantial passenger capacity in 2030 with more buses is not feasible in some key locations along the system because of roadway capacity

constraints. Increasing frequency would require headways at five minutes or less. Further, the Downtown street network cannot support the number of buses that would be required to meet projected demand. As a result of growth in traffic congestion and the lack of exclusive right-of-way for transit vehicles, bus speeds have gradually declined over the past several years and would continue to decline under the No Build Alternative.

In addition, the Transportation System Management (TSM) Alternative studied during the Alternatives Analysis increased bus service. The alternative included express bus service that operated as bus rapid transit in existing facilities. Bus frequencies would have been increased during peak periods to provide improved service for work-related trips, particularly from developing areas. The bus fleet was assumed to increase from 525 to 765 buses, and park-and-ride lots were assumed at West Kapolei, UH West Oahu, Waipio, and Aloha Stadium. The TSM Alternative would have improved transit travel times, but it would have done little to improve corridor mobility and travel reliability. Roadway congestion also would not have been alleviated.

With the Project, bus service will be enhanced and the bus network will be modified to coordinate with the fixed guideway system. Some existing bus routes, including peak-period express buses, will be altered or eliminated to reduce duplication of services provided by the fixed guideway system. Buses removed from service in the study corridor will be shifted to service in other parts of Oahu, resulting in improved transit service islandwide. Certain local routes will be rerouted or reclassified as feeder buses to provide frequent and reliable connections to the nearest fixed guideway station. Bus routes and frequencies with the Project are shown in Appendix D of the Final EIS.

Lastly, Chapter 6 of the Final EIS describes the financial resources anticipated to be needed to pay for the capital costs of the Project and for ongoing operating and maintenance costs. Capital costs of the Project, including finance charges, are expected to be fully paid for by a combination of FTA Section 5309 New Starts Funds from the Federal government and the General Excise and Use Tax surcharge revenues collected from 2007 through 2022 on Oahu. Operating and maintenance costs will be paid for from the same sources currently used for TheBus, Federal funding, fare revenues, and City revenues from the General and Highway Funds. These funding assumptions are subject to a number of risks and uncertainties, as described in Section 6.6.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

From: Yoshioka, Wayne
Sent: Friday, February 06, 2009 6:00 PM
To: Yadao, Elisa; Nishioka, Edward M.
Cc: Miyamoto, Faith; Hamayasu, Toru; Thom, Sharon Ann; Stoeck, Lynette
Subject: FW: Honolulu Transit Project DEIS
Importance: High

Aloha auinala!

Another comment for the DEIS.

A hui hou,

Wayne

From: Cinnie Frith [mailto:cfrith@fbsmgt.com]
Sent: Friday, February 06, 2009 5:48 PM
To: Yoshioka, Wayne
Subject: Honolulu Transit Project DEIS

I would like to comment on a few of my many concerns about this project that are not covered to my satisfaction in the DEIS. My two main concerns have always centered around cost as it pertains to projected usage and available jobs for Hawaiian workers.

As to costs, touched upon in Chapter 1, what if we go "over budget" or we don't receive the federal money as expected? What if the increased GET tax is not enough to pay for the citizen's portion of the project? What if ridership does not materialize as anticipated? What if all of your mitigation efforts, which are very poorly explained throughout the report, do not work well enough to "mitigate"?

In Chapter 2 of the report on page 5 you state-"The managed lane alternative would not have supported the planned concentrated future population and employment growth because it would not provide concentrations of transit service that would serve as a nucleus for TOD". This statement reminds me of the tail waging the dog, in that I was under the distinct impression that this project was to relieve traffic congestion, and not the other way around! What is the source used for stating that there are "no funding sources" for this alternative?

On page 13 of Chapter 2, you talk about "committed congestion- a relief project in the Oahu Regional Transportation Plan 2030. Can you expand on the meaning of this project? Did I also read correctly that there was need for a traction power substation EVERY MILE? On page 38 they talk about the provision for vehicular propulsion and auxilliary power to be housed in a steel "box" with dimensions of 40'long by 16'wide by 12"wide! Were will they be located and how will they be protected as they will contain transformers, rectifiers, batteries and ventilation-all connected to an existing electrical grid?

On page 39 of Chapter 2, you do address use of the "local" work force, stating that one of the reasons for the phase approach to the entire project is to"match the rate of construction to what can be maintained with the local workforce and resources". Can you elaborate on the skill level needed for much of this project and if the work force has the capacity to take on such a huge and daunting task? Again, I sense the tail is wagging the dog!

On to Chapter 3 page 2-What is an on board transit survey? It appears that one was completed and became part of the OMPO travel demand forecasting model which was used to "predict" future traffic conditions and Transit ridership. Then on page 26 it is stated that "under any build alternative average travel time on transit would improve dramatically, enhancing overall mobility and accessibility". Is this statement inclusive of all time getting from point A(initial departure) to point B(final destination)? Then you go on to say,"In some cases, transit travel times would be 1/2 of today's time". Could you give a specific example?

Page 28-table 3-5 really has me confused! Station to station travel times with down time are clearly stated in columns, but two of the columns are missing 7 stats/times and the other two are missing 5stats/times. How can you come up with a realistic total when you're missing so much information? I must also state that I have never believed for one moment that the down time at each station was realistic to what is needed for people to get on and off any form of public transportation SAFELY.

Chapter 3 page 37 states that there will be no reduction of the number of roadway lanes upon completion of the project (table 3-21), but as I continued through this section to page 43 I was alarmed to realize that some areas would loose their 4' bike lanes and have to co-mingle. with traffic on a shared lane that was now downsized to 14' wide. Other areas would see more nerrow sidewalks with pedestrians having less space. It would appear we're robbing Peter(The people) to pay Paul(The train), and it feels like a very slippery slope for public safety.

Finally-pages 48-50 talk about a Traffic Plan on how you minimize construction effects, but is there a plan in place? The same question is askad about a Transit Mitigation Plan-is there one in place?

My concerns do continue, especially where the esthetics of this project are concerned. In your initial summary on page 6 you talk about this project as "trying to enhance the visual and esthetic opportunities that it creates". Looking beyond the horrendous cost and all the political wheeling and dealing, I hate to see this beautiful island blighted with this "steel elephant" and our grandchildren choked with a financial burden they do not deserve nor can ill afford.

Cynthia Frith

DEPARTMENT OF TRANSPORTATION SERVICES

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010 RT2/09-299113R

Ms. Cynthia Frith
cfrith@fbsmgt.com

Dear Ms. Frith:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

Recognizing that costs are a constant variable and ridership forecasting is subject to uncertainties, the FTA requires that both be developed according to procedures defined over the past three decades of experience with this type of project. The capital plan for the Project is presented in Section 6.3 of the Final EIS, which includes a description of the amount of funding anticipated from various sources. The capital plan takes the current economic downturn into account. Section 6.6 of the Final EIS describes risks and uncertainties associated with these funding assumptions. The financial plan is a dynamic document that will be updated as conditions warrant. If the Project is over budget, other sources of revenue have been identified in Section 6.6 of the Final EIS to cover such shortfalls; however, 30 percent of the Project budget is contingency for just such eventualities.

Regarding ridership projections, the Project is one of the first in the country to design and undertake an uncertainty analysis of this type of travel forecast. The uncertainty analysis

evaluates the variability of the forecast by establishing probabilistic upper and lower limits of ridership projections. FTA has worked closely with the City during this effort. A variety of factors were considered in the uncertainty analysis, including the following:

- *Variations in assumptions regarding the magnitude and distribution patterns of future growth in the Ewa end of the corridor*
- *The impact of various levels of investment in highway infrastructure*
- *The expected frequency of service provided by the Project*
- *Park-and-ride behavior with the new system in place*
- *The implications on ridership of vehicle and passenger amenities provided by the new guideway vehicles*

Given all the factors considered, the anticipated limits for guideway ridership in 2030 is expected to be between 105,000 and 130,000 trips per day, bracketing the official forecast of 116,000 riders a day used for all calculations.

As far as mitigation, the proposed measures are based on what has worked on other projects and the need for specific improvements as a result of the Project.

As described in Section 1.8 of the Draft EIS, one purpose of the Project is to support planned development. Section 2.1.2 of the Draft EIS explains that the Managed Lane Alternative would not have qualified for local excise and use tax surcharge funding. Because single-occupant vehicles would have been permitted, even if tolled, Federal New Starts funding could not have been used.

The Oahu Regional Transportation Plan (ORTP) is a long-term vision document that outlines transportation goals, objectives, and policies for Oahu. The ORTP guides future development of the major surface transportation facilities and programs. Projects in the ORTP are broken down into several categories, including island-wide, transit, and congestion relief. Congestion-relief projects are roadway projects that increase roadway capacity. Table 2-4 of the Final EIS lists congestion-relief projects included in the 2030 ORTP. These projects were included in all 2030 model projections conducted for the Project. The Project is included as a transit project in the ORTP. Additional details may be found in that plan. As described in Chapter 2, traction power substations will be located approximately every mile. They will be enclosed and locked. Their locations are shown in Figures 2-8 through 2-11 of the Final EIS.

Construction activities for the majority of the transit system are similar to roadway and building construction. Appendix E of the Final EIS details construction methods that are used for both rail transit and elevated highway construction and were employed on the H-3 freeway. Experienced labor is locally available. A limited number of specialists will be needed to work with locally available labor in certain areas, such as transit power and signaling specialists working with local electricians to install system equipment.

An on-board survey was provided to bus riders to obtain ridership information for bus routes, including boardings and alightings. The survey was also used to collect information about ridership during different times of the day. The results of the survey were then incorporated into the travel demand forecasting model. Figure 3-7 of the Final EIS shows a.m. peak-period transit travel times for 2007 and 2030 with and without the Project. As shown in this figure, travel times are shorter with the fixed guideway. For instance, travel time from Kapolei to Pearl Harbor is approximately 100 minutes under No Build conditions but 45 minutes with the Project. These transit travel times include walking, possible bus travel to the stations, and other components of the entire trip.

Table 3-15 of the Draft EIS shows station-to-station travel time for each alternative; however, not every station is served by each of the alternatives studied in the Draft EIS. For instance, the Airport Alternative will serve stations on Kamehameha Highway (Pearl Harbor, Airport, and Lagoon Drive). The Airport Alternative will not serve stations along Salt Lake Boulevard, such as Ala Lilikoi, and accordingly, travel times are not applicable (represented by the n/a on the table) for this station. In addition, there are two potential sites being considered for the Aloha Stadium Station; the location varies based on the alternative. Accordingly, the information is not missing; it just does not apply to that station.

Regarding dwell time, Section 2.5.1 of the Final EIS indicated that trains will be capable of reaching 50 miles per hour or faster, and will achieve an average, including dwell times at stations, of 30 miles per hour or faster. The estimated dwell time at stations is based on experience with other rail systems that operate multi-car trains with each car having multiple doorways to allow quick and safe passenger access and egress.

In a few cases, narrow rights-of-way make it necessary to reduce the width of travel lanes, bike lanes, and sidewalks to accommodate the guideway support columns. This was done to minimize impacts to existing buildings and property. Americans with Disabilities Act (ADA) requirements and local regulations for sidewalk widths are being followed throughout the Project. As shown in Table 3-25 of the Final EIS, bicycle lanes will not be taken away as a result of the Project.

The Maintenance of Traffic Plan and Transit Mitigation Plan will be developed by the contractor with approval from the City and the Hawaii Department of Transportation prior to starting construction. These plans cannot be created until Final Design is completed for the system.

The assessment of visual effect due to the Project as described in Section 4.8.3 of the Final EIS considers changes to the visual landscape and viewer responses to those changes. This includes the existing development along the Project alignment. Within the Project corridor the environment changes from rural at the Wai'anae end of the corridor to dense high-rise development at the Koko Head end.

As part of the design process, the City has developed design principles, which are identified in the Honolulu High-Capacity Transit Corridor Project Compendium of Design Criteria (RTD 2009m) that will be implemented in final design to minimize visual effects of the Project. For example, guideway materials and surface textures will be selected in accordance with

generally accepted architectural principles to achieve effective integration between the guideway and its surrounding environment. Landscape and streetscape improvements will mitigate potential visual impacts, primarily for street-level views.

Other measures to address visual impacts of the Project are being developed through the station design and planning process. The initial station area plans and design guidelines were first developed with coordination between DTS and the Department of Planning and Permitting (DPP). The next level of transit station design focuses on integrating individual neighborhood characteristics of the communities served by the stations.

The following mitigation framework will be included in the Project to minimize negative visual effects and enhance the visual and aesthetic opportunities that it creates:

- *Develop and apply design guidelines that will establish a consistent design framework for the Project with consideration of local context.*
- *Coordinate the project design with City TOD planning and DPP.*
- *Consult with the communities surrounding each station for input on station design elements.*
- *Consider specific sites for landscaping and trees during the final design phase when plans for new plantings will be prepared by a landscape architect. Landscape and streetscape improvements will serve to mitigate potential visual impacts.*

Section 4.8.3 of the Final EIS, Design Principles and Mitigation includes information related to the mitigation framework described above. Specifically architecture and landscape design criteria include guidelines regarding site design, materials and finishes, and lighting, which apply to stations, station areas, and the guideway.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Status :	Initial Action Needed
Creation Date :	1/6/2009
Creator Affiliation :	
First Name :	William
Last Name :	Froelich
Business/Organization :	Colliers
Address :	2572 LEMON ROAD
Alternative Preference :	
Apt./Suite No. :	1105
City :	Honolulu
State :	HI
Zip Code :	96815
Email :	wfroelich@hotmail.com
Telephone :	
Telephone Extension :	
Add to Mailing List :	Both
Submission Method :	Website
Other Submission Method :	
Submission Date :	01/06/2009
Submission Content/Notes :	Is there any info available on what areas may be subject to a zoning change? I have a home near a planed rail area and would like to know.

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, 3RD FLOOR
HONOLULU, HAWAII 96813
Phone: (808) 768-8305 • Fax: (808) 768-4730 • Internet: www.honolulu.gov

MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-332729

Mr. William Froelich
2572 Lemon Road
Apartment 1105
Honolulu, Hawaii 96815

Dear Mr. Froelich:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraph addresses your comments regarding the above-referenced submittal:

As stated in Section 4.19.2 of the Final EIS, transit-oriented development (TOD) is expected to occur in project station areas as an indirect effect of the Project. Planning and zoning around station areas will be conducted and established by the City's Department of Planning and Permitting under a process covered by the City's new TOD ordinance 09-4. It is likely that the City will adopt zoning rules that will allow more dense development near transit stations. However, changes in zoning are not a part of this Project.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this

letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
Creation Date :	11/20/2008
Creator Affiliation :	
First Name :	Kathleen
Last Name :	Fung
Business/Organization :	
Address :	
Alternative Preference :	Airport
Apt./Suite No. :	
City :	
State :	HI
Zip Code :	96816
Email :	
Telephone :	
Telephone Extension :	
Add to Mailing List :	None
Submission Method :	Website
Other Submission Method :	
Submission Date :	11/20/2008
Submission Content/Notes :	I am pro the airport route as opposed to Salt Lake. Having grown up in New York and Connecticut, with rail the primary method of public transportation, I walked to the train station, about 2 miles. It's just easier than driving and finding and paying for parking in New York City. Salt Lake residents can walk, bus, bike or drive to pick up the train at the Lagoon station (be sure there is free parking). We have good weather here! Not sleet, freezing rain and snow. Be smart! Put it where it will get the most use and decrease the most traffic. People will adjust to anything that makes their life cheaper and easier. The Salt Lake residents will adjust to picking up their train a few miles away. Adult commuters where I grew up, took their "station car", a cheap, get around car, 15 - 20 minutes to the station, picked up the train for the 60 minute ride to New York, and walked to their offices. It's what you do when you live or work in a crowded city. We are no different. It's just not yet second nature to us. The airport route has the potential to service a much wider population.

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-330568

Ms. Kathleen Fung
(No address or e-mail provided)

Dear Ms. Fung:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraph addresses your comments regarding the above-referenced submittal:

While each of the alternatives discussed in the Draft EIS includes trade-offs between benefits and impacts, the Airport Alternative from East Kapolei to Ala Moana has been selected as the Preferred Alternative as described above. As compared to the alternatives discussed in the Draft EIS, the Airport Alternative will carry the most passengers, provide the greatest transit-user benefits, and result in the fewest vehicle hours of delay. It will provide access to employment centers at Pearl Harbor Naval Base and Honolulu International Airport and will serve the Salt Lake neighborhood with connecting bus service. Of the three Build Alternatives addressed in the Draft EIS, the Airport Alternative will have slightly less impacts to the natural and built environment analyzed in the Draft EIS. During the public comment period on the Draft EIS, the public overwhelmingly supported the Airport Alternative. Of the comments that specifically supported one of the alternatives, more than 75 percent were in support of the Airport Alternative. For more information this selection is discussed in Section 2.4 of the Final EIS. Since publication of the Draft EIS, design has been advanced, further analysis has been

completed, and information has been added in response to comments on the Draft EIS and agency coordination. The Final EIS discusses the process that was used to select the Preferred Alternative, how comments were considered in the decision-making process, impacts and mitigation commitments.

The FTA and DTS appreciate your interest in the Project. The Final EIS has been issued in conjunction with the distribution of this letter. You may view the Final EIS on the Project website at www.honolulutransit.org. You may request a DVD of the Final EIS and additional content through the "Contact Us" tab on the website or by calling the Project hotline at 566-2299. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

298278

REGARDING DRAFT ENVIRONMENTAL IMPACT STATEMENT

TO: MR. WAYNE YOSHIOKA
Dept. of Transportation Services
City and County of Honolulu
650 So. King St., 3rd Floor
Honolulu, Hi 96813

From: Mrs. Leatrice Fung
3088 La Pietra Circle
Honolulu, Hawaii 96815

I am very much against the Draft Environmental Impact Statement (Deis) for the following reasons:

• Rail is completely dependent on fossil fuel (much of it foreign fossil fuel) throughout it's life. This is exactly the opposite of what we should be doing. We should be reducing our dependency on fossil fuels. Vehicle energy is moving away from fossil fuels. Every few years there is an improvement away from fossil fuels. Rail is the worse climate warmer.

• The need to replace our sewer system is much more important than building the rail system. Our untreated sewage leaking, discharging, or gushing out of our sewage pipes is not only hygienically unsafe but disgusting and repulsive. The accident on McCully last month was unnecessary and shameful.

• The visual blight of elevated rail lines throughout town will be an eye sore wherever it goes. Imagine the height of the rail around Nordstrom being 145' above ground.

• The noise blight of the rail system 79db at 50 ft. will cause nerves to fray, the gradual deterioration of the neighborhoods accompanied with economic costs, and reduced property taxes.

•Rail will create increased traffic congestion in town as supporting pillors take away valuable road space.

• Hot lanes provide cheaper/better solutions to our traffic problems so why not save the money? Our state budget is over $1billion in debt this year before we even start.

Sincerely yours,

Leatrice Fung

Leatrice Fung

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010 RT9/09-335129

Mr. Lawrence and Mrs. Leatrice Fung
3088 La Pietra Circle
Honolulu, Hawaii 96815

Dear Mr. and Mrs. Fung:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address comments regarding the above-referenced submittal:

Your preference for the No Build Alternative has been noted. The No Build Alternative does not address the Project's needs or meet its purpose as established in Sections 1.7 and 1.8 of the Draft EIS. While each of the alternatives discussed in the Draft EIS includes trade-offs between benefits and impacts, the Airport Alternative from East Kapolei to Ala Moana has been identified as the Preferred Alternative as described above. Compared to the other alternatives discussed in the Draft EIS, the Airport Alternative will carry the most passengers, provide the greatest transit-user benefits, and result in the fewest vehicle hours of delay. It will provide access to employment centers at Pearl Harbor Naval Base and Honolulu International Airport and will serve the Salt Lake neighborhood with connecting bus service. Of the three Build Alternatives addressed in the Draft EIS, the Airport Alternative will have slightly lower impacts to the natural and built environment. During the public comment period on the Draft EIS, the public overwhelmingly supported the Airport Alternative. Of the comments that specifically

supported one of the alternatives, more than 75 percent were in support of the Airport Alternative.

The Alternatives Analysis phase, which preceded the EIS process, is documented in Chapter 2 of the Final EIS. It evaluated a range of modal and general alignment alternatives, in terms of their costs, benefits, and impacts. The scoping process for the Alternatives Analysis involved a presentation of the viable alternatives to the public and interested public agencies and officials to receive comments on the Purpose and Need, alternatives, and scope of the analysis. Scoping for the EIS followed the FTA process that provides for a culling of alternatives studied in the EIS through an Alternatives Analysis. The scoping process initiated for the Alternatives Analysis included a variety of highway, bus and fixed guideway options for consideration. During the later scoping effort for the EIS, the public was requested to propose alternatives that would satisfy the purpose and need at less cost or with greater effectiveness, less environmental or community impact and to propose alternatives that were not previously studied and eliminated for good cause. The only alternative that emerged that met these criteria was a fixed-guideway alternative following several alternative alignments. All reasonable alternatives that emerged from these processes were ultimately evaluated in the Draft and Final EISs.

Since publication of the Draft EIS, design has been advanced, further analysis has been completed, and information has been added in response to comments on the Draft EIS and agency coordination. The Final EIS discusses the process that was used to select the Preferred Alternative, how comments were considered in the decision-making process, impacts, and mitigation commitments.

Regarding your comment on fossil fuels, the Project will consume approximately 1 to 2 percent of the total projected electricity generated on Oahu in 2030. HECO is moving toward renewable energy generation. As that happens, the fixed guideway will also benefit from such new sources of energy. In addition, the integration of photovoltaic cells into stations and other project features could reduce net project electricity demand.

Per your next comment, the enabling legislation for the General Excise and Use Tax (GET) surcharge precludes the use of the collected funds for the wastewater system.

The Project has evaluated visual blight issues. Near Ala Moana Center, the guideway will be approximately 30 feet above the existing ground. There is no proposal to construct any portion of the Project or potential future extensions 145 feet above the ground. Section 4.8 of the Final EIS addresses the visual effects of the Project.

The assessment of visual effect due to the Project as described in Section 4.8.3 of the Final EIS considers changes to the visual landscape and viewer responses to those changes. This includes the existing development along the Project alignment. Within the Project corridor the environment changes from rural at the Wai'anae end of the corridor to dense high-rise development at the Koko Head end.

As part of the design process, the City has developed design principles, which are identified in the Honolulu High-Capacity Transit Corridor Project Compendium of Design Criteria

(RTD 2009m) that will be implemented in final design to minimize visual effects of the Project. For example, guideway materials and surface textures will be selected in accordance with generally accepted architectural principles to achieve effective integration between the guideway and its surrounding environment. Landscape and streetscape improvements will mitigate potential visual impacts, primarily for street-level views.

Other measures to address visual impacts of the Project are being developed through the station design and planning process. The initial station area plans and design guidelines were first developed with coordination between DTS and the Department of Planning and Permitting (DPP). The next level of transit station design focuses on integrating individual neighborhood characteristics of the communities served by the stations.

The following mitigation framework will be included in the Project to minimize negative visual effects and enhance the visual and aesthetic opportunities that it creates:

- *Develop and apply design guidelines that will establish a consistent design framework for the Project with consideration of local context.*
- *Coordinate the project design with City TOD planning and DPP.*
- *Consult with the communities surrounding each station for input on station design elements.*
- *Consider specific sites for landscaping and trees during the final design phase when plans for new plantings will be prepared by a landscape architect. Landscape and streetscape improvements will serve to mitigate potential visual impacts.*

Section 4.8.3 of the Final EIS, Design Principles and Mitigation includes information related to the mitigation framework described above. Specifically architecture and landscape design criteria include guidelines regarding site design, materials and finishes, and lighting, which apply to stations, station areas, and the guideway.

As stated in Section 4.10.3 of the Final EIS, the Project will cause no severe noise impacts. Without mitigation, moderate impacts would occur at upper floors of a few high-rise buildings (as shown in Table 4-18 in the Final EIS). With mitigation in place (sound absorbing material, parapet wall and wheel skirts), the noise analysis indicates that the new noise generated by the Project will be lower than the existing noise levels in most places.

In addition, as seen in other cities, the value of properties with access to transit stations is higher than for properties that are distant from the system. In addition, other development, including retail, businesses, schools, etc., could occur near transit stations.

The Airport Alternative will not result in any lanes being taken away. Some lane widths will be reduced to accommodate column placement; however, this will not affect roadway capacity. Table 3-21 of the Final EIS presents information regarding the effects of column placement on streets and highways. As shown in Table 3-23 of the Final EIS, project-related traffic will affect six intersections in either the a.m. and/or p.m. peak hours. At these intersections (one near East Kapolei Station, one near UH West Oahu Station, three near the Pearl Highlands Station, and one near Ala Moana Center Station), traffic volumes under the Project will increase delay compared to the No Build Alternative. The Project will include

measures to mitigate impacts at these intersections. Mitigation measures are discussed in Section 3.4.7 of the Final EIS.

Lastly, your preference for HOT lanes is noted. In Chapter 2 of the Final EIS, as well as in Chapter 2 of the Alternatives Analysis, the total capital costs for the Managed Lane Alternative would range between $3.6 and $4.7 billion, of which $2.6 to $3.8 billion would be for construction of the managed lanes. The transit operating costs for the Managed Lane Alternative would range between approximately $251 and $261 million because of additional buses that would be put in service under that alternative. These costs do not include the cost of maintaining the managed lane facility. In Chapter 6 of the Final EIS, the capital costs of the Fixed Guideway Alternative, including bus system costs, will be $4.6 billion in 2009 dollars for the East Kapolei to Ala Moana Center Airport Alignment. Total operating costs for the Project, including TheBus, TheHandi-Van, and the fixed guideway, will be approximately $298 million.

The Fixed Guideway will be more cost-effective over the long-term. Funding sources for the capital investments include a State GET surcharge, City General Obligation bonds, and FTA funds. Only the Fixed Guideway Alternative could be funded with the GET surcharge. The GET is expected to generate $3.5 billion through 2022 and the FTA's agreement to consider at least $1.55 billion for Federal contribution to the Project through the New Starts program for the Fixed Guideway. No funding sources were identified for the Managed Lane Alternative. Toll revenues from the Managed Lane Alternative would pay for ongoing operations and maintenance while remaining revenues would be used to repay debt incurred to construct the system.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	In Process
Record Date :	12/8/2008
First Name :	Dexter
Last Name :	Furuhashi
Business/Organization :	
Address :	1564 North King St.
Apt./Suite No. :	
City :	Honolulu
State :	HI
Zip Code :	96817
Email :	dexter_furuhashi@notes.k12.hi.us
Telephone :	808 2165348
Telephone Extension :	
Add to Mailing List :	Email
Submission Method :	Website
Submission Content/Notes :	For the proposed transit centers and park n' rides, what is the noise and traffic impact radius indicated and what document discusses such impact ? Is there a conceptual drawing of a transit center or park n' ride located on line ?
Reply Requested :	Yes

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-331313

Mr. Dexter Furuhashi
1564 North King Street
Honolulu, Hawaii 96817

Dear Mr. Furuhashi:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall indentify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraph addresses your comments regarding the above-referenced submittal:

Noise measurement locations and results are shown in Figures 4-53 through 4-56 in Chapter 4 of the Final EIS. As discussed in this chapter, park-and-ride lots are located in undeveloped or commercial areas. The nearest distance from a residential use to a park-and-ride lot will be more than 1,000 feet. There are no noise impacts regarding park-and-ride lots for the Project due to their distance from sensitive noise receptors. Traffic impacts related to park-and-ride lots are described in Section 3.4.3 of the Final EIS. Intersections near each park-and-ride lot were analyzed to determine potential effects from park-and-ride traffic. Conceptual layouts of transit centers and park-and-ride facilities are provided in Chapter 2 of the Final EIS. Appendix B, Conceptual Alignment Plans and Profiles, in the Final EIS also shows the relationship of each facility with nearby surroundings. These documents are located on the project website at: www.honolulutransit.org under the "Library" tab.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

From: Yoshioka, Wayne
Sent: Friday, February 06, 2009 3:04 PM
To: Yadao, Elisa; Nishioka, Edward M.
Cc: Miyamoto, Faith; Hamayasu, Toru; Thom, Sharon Ann; Stoeck, Lynette
Subject: FW: Comments on EIS for Honolulu Fixed Guideway Mass Transit System
Importance: High

Aloha kakou!

Another DEIS comment.

A hui hou,

Wayne

From: Alan Gano [mailto:gerneaux@hawaii.rr.com]
Sent: Friday, February 06, 2009 2:56 PM
To: Ted.Matley@dot.gov
Cc: Yoshioka, Wayne
Subject: Comments on EIS for Honolulu Fixed Guideway Mass Transit System

I have not even bothered to read the EIS, primarily because I learned from my previous participation in testifying before the Honolulu City Council and it's Transportation Committee, attending, speaking at, and asking questions at numerous public "mis"information meetings and other public forums; that the complete process has been co-opted by the Mayor, certain City Councilpersons, DTS and the contractors, Parsons Brinckerhoff and InfraConsult, with apparent collusion or at least acquiesence by DTA officials and members of the Hawaii

Congressional delegation.

I have consistently supported a fair and competitive bidding process for the selection of both the technology and the vendor (which is allegedly the FTA policy), but with the elimination of the HSST Maglev, we have lost the environmental war in the transportation arena since the environmental footprint of the proposed steel wheel on steel rail system, will dwarf that of the HSST Maglev, including guideway size/width, air pollution, noise pollution, asthetics and cost.

It is a sad day for the mis-informed citizens and taxpayers of Honolulu; when their Mayor and other public officials can lie to them and cheat them, and the local print and broadcast media as well as our federal officials do not hold them accountable.

Alan R. Gano
P.O. Box 29521
Honolulu, HI 96820-1921

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, 3RD FLOOR
HONOLULU, HAWAII 96813
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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010 RT2/09-299101R

Mr. Alan R. Gano
P.O. Box 29521
Honolulu, Hawaii 96820-1921

Dear Mr. Gano:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

As stated in Section 2.2.3 of this Final EIS, the NEPA Notice of Intent requested input on five transit technologies. A technical review process included the opportunity for public comment and was used in parallel with the alternatives analysis to select a transit technology. The process included a broad request for information that was publicized to the transit industry. Transit vehicle manufacturers submitted 12 responses covering all of the technologies listed in the Notice of Intent. An independent five-member technology panel composed of four transit experts and a transportation academic appointed by the City Council evaluated guided rubber-tire-on-concrete systems (e.g., Phileas bus system and VAL-type systems), monorail (which is a variation on rubber-tyred technology), steel-wheel-on-steel-rail systems, (e.g., light rail and rapid rail), and magnetic levitation (MAGLEV) . The panel considered the performance, cost, and reliability of the proposed technologies.

Proprietary technologies, meaning those technologies that would have required all future purchases of vehicles or equipment to be from a single manufacturer, were eliminated because none of the proprietary technologies offered substantial proven performance, cost, and reliability benefits compared to steel wheel operating on steel rail.

The panel accepted public comment twice as part of its review. By a four-to-one vote, the panel chose a steel wheel vehicle operating on steel rail system because it was considered safe, reliable, economical, and non-proprietary. Those results are documented in the panel's report to the City Council dated February 22, 2008 entitled "Independent Technology Selection Panel Report".

There is one operating urban magnetic levitation system in the world, and it has less than five years of operating record. Maglev would likely require more energy than the steel wheel on steel rail system, thus having a greater affect on air pollution. While the system is quieter, other systems may be designed to match the noise level of magnetic levitation when in operation. The assumed visual benefits for beam-track vehicles would not apply in the U.S. because of requirements to include an emergency egress walkway. In addition, the smaller structures proposed in the comment result in shorter span lengths, which increases the number of columns required and the percentage of views blocked by the support structure, which would result in higher costs.

In addition, the magnetic levitation system would not provide a net benefit or proven cost savings and would not change the selected alternative. In fact, the operators of the High Speed Surface Transport system have declined to make operating expenses available. No comparative maglev project has ever been built in the U.S. Therefore, no data are available to support a cost estimate. Some of the savings recognized in other countries for beam-track vehicles would not apply in the U.S. because of requirements to include an emergency egress walkway. In addition, shorter span lengths increase the number of columns required, and thus the cost to construct both the additional foundations and columns. With no comparative data available to support an operating cost estimate, there are no means to verify the statement regarding maglev's operating and maintenance costs compared to a steel wheel system.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
Creation Date :	11/10/2008
Creator Affiliation :	
First Name :	Ginalynn
Last Name :	Garces
Business/Organization :	Student
Address :	215 n king st
Alternative Preference :	
Apt./Suite No. :	1608
City :	honolulu
State :	HI
Zip Code :	96817
Email :	gina08garces@yahoo.com
Telephone :	2067346501
Telephone Extension :	
Add to Mailing List :	Both
Submission Method :	Website
Other Submission Method :	
Submission Date :	11/10/2008
Submission Content/Notes :	Hi this is Ginalynn. I had just moved here about a year ago. I have family in Kapolei. At times, I spend the night at family member's house in the westside of Oahu and i feel that something should be done with the traffic in the mornings, it is horrible, the rail in fact is a good start in helping reduce the traffic flow. It takes me about 2 or 3 hours to get to china town in the early mornings.

DEPARTMENT OF TRANSPORTATION SERVICES

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010 RT9/09-330414

Ms. Ginalynn Garces
215 North King Street
Apartment 1608
Honolulu, Hawaii 96817

Dear Ms. Garces:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

While each of the alternatives discussed in the Draft EIS includes trade-offs between benefits and impacts, the Airport Alternative from East Kapolei to Ala Moana has been selected as the Preferred Alternative as described above. As compared to the alternatives discussed in the Draft EIS, the Airport Alternative will carry the most passengers, provide the greatest transit-user benefits, and result in the fewest vehicle hours of delay. It will provide access to employment centers at Pearl Harbor Naval Base and Honolulu International Airport and will serve the Salt Lake neighborhood with connecting bus service. Of the three Build Alternatives addressed in the Draft EIS, the Airport Alternative will have slightly less impacts to the natural and built environment analyzed in the Draft EIS. During the public comment period on the Draft EIS, the public overwhelmingly supported the Airport Alternative. Of the comments that specifically supported one of the alternatives, more than 75 percent were in support of the

Airport Alternative. For more information this selection is discussed in Section 2.4 of the Final EIS. Since publication of the Draft EIS, design has been advanced, further analysis has been completed, and information has been added in response to comments on the Draft EIS and agency coordination. The Final EIS discusses the process that was used to select the Preferred Alternative, how comments were considered in the decision-making process, impacts and mitigation commitments.

As shown in Figure 3-7 in the Final EIS, transit travel time from Kapolei to Downtown in 2030 will take approximately 55 minutes with the Project compared to approximately 90 minutes under No Build conditions.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Frank Genadio
12-6-08 Kapolei

From Ralph Rosenberg Court Reporters

RECEIVED
DEC 29 2008
PB AMERICAS, INC.
HONOLULU, HAWAII

DC#4827-R

Comments on Draft EIS

The City Council, which earlier this year indicated it would play a major role in selection of the transit system technology, has basically "taken a back seat" to the city administration in recent months. It was unable to pass a resolution for the proper ballot question for November, to have a transit authority—which the city wanted—develop a fixed guideway transit system. Instead, it accepted the wording of a transit foe and we were left with the steel wheels question. The city, for its part, ignored the council and apparently went ahead with this EIS long before the ballot question was approved by the council. Approval of steel wheels on the ballot does not eliminate other suppliers from the competition, but the EIS basically just "brushes off" three other technologies by using a recommendation from a highly suspect (so-called) expert panel. This limiting of alternatives was referred to in the state's review of the EIS as "troubling."

I am not here to support two of those eliminated technologies, and intend to speak only as a proponent of the HSST elevated urban magnetic levitation system. Chapter 02 of the EIS covers Alternatives Considered. In Section 2.1.3, magnetic levitation is listed as a proprietary system unproven in the U.S. Because it is not in the U.S. does not make it unproven. Using this rationale would leave us still traveling in covered wagons. In fact, the Federal Transit Administration has called the HSST a mature technology, and the system has been in revenue service in Nagoya, Japan since early 2005 with a reliability rating of well over 99 percent.

The section goes on to state that "none of the proprietary technologies offered substantial proven performance, cost, and reliability benefits compared to steel wheel operating on steel rail." Concerning the HSST, that statement is not only misleading but is patently false. Compared to steel wheel systems, the HSST mag-lev is faster, much quieter, and safer (because of its wrap-around-the-beam configuration). Its guideway also is not only less obtrusive but will be at least 20 percent cheaper to build. This is extremely important when one examines guideway length for the three alternatives and compares associated costs given in Chapter 06 with expected sources of funds.

The city has funding for a 20-mile minimum operable segment (or MOS) but includes an alternative in Section 2.2.2 that shows a combined airport and Salt Lake alternative of 25 miles. Not only does this alternative place the project over even projected budgets but it excludes any extension to the UH-Manoa campus. Personally, I strongly favor the airport and military base routing over one on Salt Lake Boulevard. If, however, the HSST were allowed to compete, and were to win the transit competition, it might be possible to satisfy most of the interested parties.

If the amount of labor and materials planned for the MOS were applied to HSST development, an additional five miles of guideway could be constructed within the MOS budget and timelines. This would accommodate the airport alignment, extension to UH-Manoa, and spurs into the Salt

Lake area as well as Waikiki. The only way to take advantage of the costs savings associated with the mag-lev is to ensure that guideway specifications are left open to suppliers in the Request for Proposals (or RFP). In Figure 2-9, the Draft EIS shows a guideway of 28-32 feet, as well as a parapet wall (for noise mitigation). This solid structure bridge is much larger than what is needed for the HSST, two beams with open space between the beams and a cross-section of 21 feet—with no need for noise mitigation walls. The narrower profile of the mag-lev guideway, coupled with the much lower sound level of the system, also will result in less impact on homes, businesses, and other facilities along the transit route. Obviously, if the Figure 2-9 chart becomes the specification in the RFP, the mag-lev cost advantage is negated. I will be submitting a comment that this chart be deleted, or shown as an example applicable only for steel wheel systems.

Finally, the costs for operations and maintenance shown in Table 6-3 reflect steel wheel on steel rail amounts anywhere from $12-18 million more per year than would be needed for the mag-lev. Despite an extra ten percent in electricity to levitate its train cars, the HSST's virtually frictionless running results in lowered costs along with a smoother ride. Over 30 years of operations, that equates to $360-540 million in savings to island taxpayers.

The bottom line is precisely that: Prevent the HSST mag-lev from competing and we pay more money for what may be an inferior system. If the city is so certain that steel wheel on steel rail is superior, modify this EIS appropriately, keep the RFP specifications general enough to enable all suppliers to have a chance, and allow the HSST to compete. After testifying at the City Council the other day, I had a discussion with a steel wheels supporter outside the chamber. He told me that adding evaluations of other technologies in the EIS would cost an additional $1.5 million. Let us place that expenditure in perspective. Compared to the 5.4 billion year-of-expenditure dollars for an airport alignment, it is .0000277 percent, or one 36,000th of the cost. This would certainly be money well spent. Take the delay, spend the money, really open the competition, and do something positive for this island's taxpayers and commuters.

Mahalo

Frank Genadio
92-1370 Kikaha Street
Kapolei, HI 96707

AR00001809

DEPARTMENT OF TRANSPORTATION SERVICES

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DEPUTY DIRECTOR

KENNETH TORU HAMAYASU
DEPUTY DIRECTOR

June 11, 2010

RT10/09-335706

Mr. Frank Genadio
92-1370 Kikaha Street
Kapolei, Hawaii 96707

Dear Mr. Genadio:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address comments regarding the above-referenced submittal:

As stated in Section 2.2.3 of this Final EIS, the NEPA Notice of Intent requested input on five transit technologies. A technical review process included the opportunity for public comment and was used in parallel with the alternatives analysis to select a transit technology. The process included a broad request for information that was publicized to the transit industry. Transit vehicle manufacturers submitted 12 responses covering all of the technologies listed in the Notice of Intent. An independent five-member technology panel composed of four transit experts and a transportation academic appointed by the City Council evaluated guided rubber-tire-on-concrete systems (e.g., Phileas bus system and VAL-type systems), monorail (which is a variation on rubber-tyred technology), steel-wheel-on-steel-rail systems, (e.g., light rail and rapid rail), and magnetic levitation (MAGLEV). The panel considered the performance, cost, and reliability of the proposed technologies.

Proprietary technologies, meaning those technologies that would have required all future purchases of vehicles or equipment to be from a single manufacturer, were eliminated because none of the proprietary technologies offered substantial proven performance, cost, and reliability benefits compared to steel wheel operating on steel rail.

The panel accepted public comment twice as part of its review. The public meetings were coordinated with the NEPA process as required by 23 CFR § 771.125 (i). By a four-to-one vote, the panel chose a steel wheel vehicle operating on steel rail system because it was considered safe, reliable, economical, and non-proprietary. Those results are documented in the panel's report to the City Council dated February 22, 2008 entitled "Independent Technology Selection Panel Report".

There is one operating urban magnetic levitation system in the world, and it has less than five years of operating record. The single operating system has a maximum speed of 100 kilometers per hour (62 miles per hour), which is similar to the maximum operating speeds of 50 to 60 miles per hour common for steel wheel systems. While the system is quieter, other systems may be designed to match the noise level of magnetic levitation when in operation. The Final EIS documents in Section 4.10 that with Project mitigation, no noise impacts to residents or businesses will occur based on FTA criteria. There are no specific safety improvements from the traction design. The assumed visual benefits for beam-track vehicles would not apply in the U.S. because of requirements to include an emergency egress walkway. In addition, the smaller structures proposed in the comment result in shorter span lengths, which increases the number of columns required and the percentage of views blocked by the support structure, which would result in higher costs.

In addition, the magnetic levitation system would not provide a net benefit or proven cost savings. To date, the High Speed Surface Transport system operators have declined to make operating expenses available. No comparative maglev project has ever been built within the U.S. Therefore, no data are available to support a cost estimate. Some of the savings recognized in other countries for beam-track vehicles would not apply in the U.S. because of requirements to include an emergency egress walkway. Also, the smaller structures proposed in the comment result in shorter span-length, which increases the number of columns required and thus the cost to construct both the additional foundations and columns. With no comparative data available to support an operating cost estimate, there are no means to verify this statement regarding maglev's operating and maintenance costs compared to a steel wheel system. The demonstrated operating speed of 100 kilometers per hour for urban magnetic levitation is similar to that of steel wheel systems.

Magnetic levitation requires a different guideway design that would have different impacts from a steel-wheel system, as presented in the previous responses above. The guideway design is being completed only for the technology that will be used for the Project.

Your preference for the Airport Alternative has been noted. While each of the alternatives discussed in the Draft EIS includes trade-offs between benefits and impacts, the Airport Alternative from East Kapolei to Ala Moana has been identified as the Preferred Alternative as described above. Compared to the other alternatives discussed in the Draft EIS, the Airport Alternative will carry the most passengers, provide the greatest transit-user benefits,

and result in the fewest vehicle hours of delay. It will provide access to employment centers at Pearl Harbor Naval Base and Honolulu International Airport and will serve the Salt Lake neighborhood with connecting bus service. Of the three Build Alternatives addressed in the Draft EIS, the Airport Alternative will have slightly lower impacts to the natural and built environment. During the public comment period on the Draft EIS, the public overwhelmingly supported the Airport Alternative. Of the comments that specifically supported one of the alternatives, more than 75 percent were in support of the Airport Alternative.

The selection of the Airport Alternative as the Project is described in Chapter 2 of the Final EIS. The discussion of alternatives considered is included in Chapter 2 of the Final EIS and the Alternatives Analysis. As provided in Chapter 3.4.2 of the Final EIS, the Airport Alternative will carry the most passengers with 116,000 daily passengers and 282,500 daily trips in 2030, thereby resulting in the greatest transit-user benefits. The Airport Alternative will also result in the fewest vehicle miles traveled and vehicle hours of delay when compared to other alternatives evaluated, as well as provide access to major employment areas including the Honolulu International Airport, that will have substantially greater ridership than other alternatives considered.

Additionally, with this Project, additional extensions are possible in the future. 23 CFR 771.111(f) states "The action evaluated in each EIS…shall not restrict consideration of alternatives for any other reasonable foreseeable transportation improvements". Future transit improvements, including an extension to the U.H. Manoa campus will not be precluded by the implementation of the Project.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

297854

Mr. Wayne Y. Yoshioka, Director
Department of Transportation Services
650 South King Street, 3rd Floor
Honolulu, Hawaii 96813

January 31, 2009

Mr. Yoshioka:

Attachments to this letter contain three pages of general comments and ten pages of specific comments on the draft Environmental Impact Statement produced by the City and County of Honolulu for its High-Capacity Transit Corridor Project. I believe that you and Mayor Hannemann still have time to correct your current direction toward holding a steel wheel on steel rail-only competition, and hope that you seriously consider "reversing course."

I am sure that your department and the contractor team are aware of persistent critical comments in letters and postings to online newspaper articles concerning the transit project. There are the obvious postings from the Stop Rail Now group, but there also are a number of people (aside from me) who want transit but do not like the obvious attempts by the city to limit the competition.

Whether or not members of the State Legislature are serious about making an attempt to seize or delay the surcharge collections going into the special fund for transit, there is little doubt that transit foes are continuing to look for ways to end the project. I recommend that the city make an announcement that there will, indeed, be a fair and open competition for both the guideway development and the transit technology. It would not only deflect a considerable amount of criticism but may return some previous supporters to full backing for the project. Aloha.

Frank Genadio

Frank Genadio
92-1370 Kikaha Street
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(808) 672-9170

RECEIVED
09 FEB 2 P12:11
DEPARTMENT OF TRANSPORTATION SERVICES
CITY & COUNTY OF HONOLULU

General Comments on the Honolulu High-Capacity Transit Corridor Project
Draft Environmental Impact Statement (EIS)

Provided by:

Frank Genadio
92-1370 Kikaha Street
Kapolei, HI 96707
(808) 672-9170

It is necessary to preface my general and specific comments to the draft EIS because, although I remain a strong supporter of fixed-rail, I have become disillusioned by the way in which the project has been handled by the administration of the City and County of Honolulu (the City) and the Honolulu City Council. I am a former member of the Committee for Balanced Transportation (CBT), which was formed as a non-partisan tax-exempt group to foster education for integrated transportation and advocate for a rapid transit system for the island of O'ahu. To assist with that goal, a small grant was received a few years ago from the American Public Transportation Association and (perhaps) $2,000 remained as of mid-2008. I terminated my CBT membership when I learned in December through a newspaper article that more than $342,000 (from "contributions" made by transit contractors and their employees and Outrigger Enterprises Inc.) had been "funneled through" the CBT in its "Go Rail Go" guise to back the City's steel wheel on steel rail (SWSR) advocacy. I also was (perhaps I still am) a member of the Transit Solutions Advisory Committee (TSAC; now known as the Transit Advisory Committee) formed by Mayor Mufi Hannemann. There have been no TSAC meetings in the past several months or, if there have been meetings, I have not received an invitation. While a member of the CBT, I also served as a CBT representative to the Citizen Advisory Committee (CAC) of the O'ahu Metropolitan Planning Organization.

As much as I would have liked to continue my (completely voluntary) effort as a member of the City's team, the change in my status stems from my public support for a fair and open competition among all transit system suppliers that qualified, based on the City's own criteria in its Request for Information. I believe that the HSST urban magnetic levitation (mag-lev) system currently operating in Nagoya, Japan would be a strong competitor—if allowed to compete. It also is necessary for me to state that I have no formal connection with the HSST's supplier, Mitsubishi-Itochu, and have not and will not receive any compensation from their companies. My sole intention is seeing Honolulu obtain the best transit system at the best price.

Presumably, the City is meeting all of the legal requirements of the Federal Transit Administration (FTA) before it pursues federal funding for the transit project. It is, however, apparently ignoring the "spirit" of FTA guidelines while following a course of action that is not in the best interests of O'ahu taxpayers and commuters. The EIS must be modified to cover all qualifying rail systems—even if it means additional expenditure of planning and analysis funds

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and a delay in the document's completion. (Personally, I feel that the contracted analytical team should have produced a comprehensive product with funding allocated to date.) One has to be impressed by the number of analysts who have worked on this project and their levels of education and experience (as given in the draft EIS)—but one also has to wonder at the seeming lack of imagination and vision shown by the city. Based on what is contained in the draft EIS, particularly in documents from two to three years ago, it appears that the whole process was used to orchestrate for an SWSR system.

My support for the HSST actually stems from a trip to Japan made by Mayor Hannemann and three members of the City Council in 2005. They praised the HSST and were even pictured demonstrating how little effort it took to move the (levitated) 52-ton train (Honolulu Star-Bulletin, October 2005). I then started research into learning more about an urban mag-lev, leading to my advocacy. Both high-speed and urban mag-lev systems operate or are under development in several nations and will undoubtedly continue to proliferate. The Maglev 2008 Conference in San Diego in December demonstrated the level of interest in modernizing U.S. transportation systems. Critics of the mag-lev cite the thousands of miles of steel rail tracks throughout the continental United States that would no longer be of use, leading to the extra expense of building mag-lev guideways. There is no such concern on the island of O'ahu, where we will "start from scratch." Implementation of a modern mag-lev system in Honolulu would not only be effective but would, in fact, be an attraction for this tourism-oriented city.

Concerning the document, a general statement on property acquisition is needed. The tables and paragraphs in Chapter 4 are all based solely on an SWSR system. The numbers would probably apply as well to a rubber tire on concrete rail system but would likely be lower for both monorail and mag-lev systems, which require less space along their guideways.

The discussions in Chapter 5 concerning acquisition of properties, including some of historical significance, are all applicable only to SWSR systems. Analysis of impacts on these properties must be made for each of the other forms of fixed-rail. In the cases of the monorail and mag-lev, the impact would certainly be lessened because of the (relatively) narrower width of their guideways.

The discussion on costs in Chapter 6 applies only to SWSR systems. Rather than comment specifically on each section of the chapter as well as the costs given elsewhere in the document, the following is a summation of the major costs associated with implementation of the HSST urban mag-lev system. (NOTE: I did not find detailed costs for the Hitachi monorail—and will leave any justification for that system up to its supplier. The costs for the HSST are based on presentations made by Itochu representatives to the Honolulu City Council.)

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The draft EIS lists costs for the (now selected) Airport Alternative at $5.433 billion. A steel wheels bridge construction (using 49 percent of total cost) would be $2.662 billion, or a cost per mile of $133 million. The HSST supplier estimates construction for the mag-lev guideway would be $570 million less, or $2.092 billion, resulting in a cost per mile of $105 million. Using the steel wheels budget of $2.662 billion, at least 25 miles of mag-lev guideway could be built (i.e., enough to reach the campus of the University of Hawaii [UH] in Manoa, an important link for ridership, with spurs to the Salt Lake Shopping Center and Waikiki).

Operations and maintenance (O&M) costs also will be cheaper using the HSST. Despite a need for about ten percent additional electricity to levitate the train, the virtually frictionless running of the mag-lev is estimated at 20 to 30 percent less (than an SWSR system) per year. Enormous savings would be realized over 30 years, considerably easing the burden on taxpayers' funding for the transit subsidy. O&M cost comparisons are given on page 8 of the specific comments, for EIS page 6-7. O&M costs savings alone would enable guideway extension into Central O'ahu, a major ridership area. Given the significant savings that can be realized with the HSST, how is it possible for the City to justify limiting the competition to SWSR systems?

The City's plan also is disappointing in its lack of any foresight for some form of express service, which would be likely to create a significant boost in ridership—particularly from West O'ahu into Downtown Honolulu and (eventually) UH and Waikiki. The EIS mentions more than once the possibility of having train operators. Any modern system should be capable of fully automated operations controlled from the transit operations center, and an operator would do nothing more than add to O&M costs.

I remain hopeful that the City will realize that the present course of action is detrimental to the best interests of the taxpayers and commuters of O'ahu, and will pursue a fair and open competition among all qualified transit system suppliers. This can be accomplished by not "tailoring" the specifications (particularly for the guideway) to favor SWSR systems, and by placing a statement prominently up front in any Request for Proposals that states something like "All guideway developers and transit system suppliers that qualified under the City's Request for Information are invited to bid."

IT IS TIME FOR A 21ST CENTURY SOLUTION!

I will end my general comments with the following extract from President Barack Obama's Inaugural Address: "And those of us who manage the public's dollars will be held to account, to spend wisely, reform bad habits, and do our business in the light of day, because only then can we restore the vital trust between a people and their government."

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Specific Comments on Draft Environmental Impact Statement - Frank Genadio

Page	Paragraph Title (abbreviated)	Statement on Which Comment is Based
	Comment and Rationale	

7 Purpose of the Draft EIS — Notice of Intent published in federal register

The actual statement in the Notice of Intent is pertinent to my criticism of the city's actions to date. It states that "The draft EIS would consider five distinct transit technologies: Light rail transit, rapid rail transit, rubber-tired guided vehicles, a magnetic levitation system, and a monorail system." The EIS does not come close to anything resembling a consideration of technologies other than steel wheels on steel rails (SWSR), presumably fitting into the first category above (since it is not planned as being "rapid").

8 Purpose of the Draft EIS — ...core 19-mile alignment...
...along Salt Lake Boulevard...first

City Council action has changed the alignment; change "19-mile" to "20-mile" and change "along Salt Lake Boulevard" to "along a route by Honolulu International Airport"

S-4 Alternatives Considered — "The panel's report resulted in the City establishing steel wheel operating on steel rail as the technology... This eliminated the other technologies from further consideration."

This statement should be removed because several meetings of the City Council followed the technology panel meetings, which were—to say the least—incomplete because of the requirements of the "Sunshine Law." The council never did pass a bill concerning technology and the panel's recommended SWSR system never received more than four (of nine) positive votes in any committee or full council meeting. It took a while to realize that the panel was, in fact, an SWSR "set-up" with four of five members having either no or very little knowledge of non-SWSR systems. The fifth member, Professor Panos D. Prevedouros (with whom I seldom agree but did in this case), criticized its proceedings extensively in the Honolulu Star-Bulletin's April 17, 2008 edition, in a column titled "Transit panel selection was case study in manipulation." The EIS seems to "downplay" the impact the panel's selection had on subsequent events; for example, it does not provide the names of panel members. The names of the other four panelists must be added so that FTA and U.S. Department of Transportation officials can determine for themselves whether or not this group was objective—or was, in fact, made up of men with little knowledge of non-SWSR systems. Recommend the addition of their names: Chair Ron Tober, Ken Knight, Henry Kolesar, Steve Barsony, and Panos Prevedouros.

S-7 Noise and Vibration — A solid parapet wall...to reduce noise levels.

Change "...noise levels." to "...noise levels if a steel-wheel-on-steel-rail system is selected." Parapet walls and wheel skirts would not be required for the HSST urban magnetic levitation (mag-lev) system because of its much lower noise level. (I do not have noise data on the conventional monorail but it is also likely that such mitigation measures would not be needed.) It also should be noted that the City has never indicated what the (added) costs might be for mitigation measures.

AR00001817

Specific Comments on Draft Environmental Impact Statement - Frank Genadio

Page	Paragraph Title (abbreviated)	Statement on Which Comment is Based
	Comment and Rationale	
2-3	2.1.1 Screening of a Broad Range...	Emerging rail concepts were eliminated because they have never been proven in real-world use and would not meet the rapid implementation schedule for the project.

This statement should be reworded for clarity to "Emerging rail concepts, other than fixed guideway, were eliminated..." Emerging rail concepts are not defined.

2-7	Table 2-2 Alternatives...Rejected	Last three rows under technologies.

These three rows need to be removed because of the extremely weak rationale for rejection given in the table. There probably are proprietary aspects of every system being considered for Honolulu's transit project. Suppliers of these three rail technologies, if allowed to compete, would undoubtedly work with City officials to ease any proprietary concerns. The added statement for Magnetic Levitation, "unproven in U.S.," is ridiculous. The first use of a steam locomotive was in the United Kingdom in 1804, and the first commercial use in the United States was in 1829. If anything unproven in the U.S. cannot be considered, we would still be moving people and cargo in covered wagons. It should be noted that the Mitsubishi-Itochu HSST urban mag-lev is now approaching four years of extremely high reliability revenue service in Nagoya, Japan.

2-8	2.1.3 Alternatives Consideration...	Statement in discussion of panel selection that ends with "...none of the proprietary technologies offered substantial proven performance, cost, and reliability benefits compared to steel wheel operating on steel rail."

This is just another attempt in the document to justify SWSR systems, and is patently false concerning the HSST mag-lev. Compared to any steel wheels system's performance, the HSST is faster (at 62.5 miles per hour compared to 55), much quieter (in the range of an average television level in a home, or at least twice as quiet as noise-mitigated SWSR), and smoother riding because it is levitated above its guideway beam. As of late last year the HSST had carried more than 30 million passengers with a reliability rating of more than 99.9 percent; can any SWSR system match that? As for cost, the HSST supplier estimates that, at current costs, the 20-mile minimum operable segment (MOS) guideway could be built for $570 million less than SWSR. For operations and maintenance (O&M) costs, despite about ten percent electricity (needed to levitate the train), the HSST O&M costs would be considerably less per year than SWSR (see details for page 6-7 comment). These benefits are indeed substantial, and indicate that the panel's goal was to justify the City's choice, not perform a real evaluation of each of the suppliers that met the criteria in the Request for Information (RFI). The irrelevancy of the panel makes the remainder of the EIS incomplete because all of its analyses are based solely on SWSR systems. The last two paragraphs of this section (2.1.3) should be removed as the first step in the necessary re-write of this EIS.

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Specific Comments on Draft Environmental Impact Statement - Frank Genadio

Page	Paragraph Title (abbreviated)	Statement on Which Comment is Based
	Comment and Rationale	

2-9 2.2 Alternatives Evaluated in...EIS Last paragraph on "A connection to..."

Based on City Council action, reword this sentence to "A connection to a station along Salt Lake Boulevard could be built as a phasing option.....and Ala Moana Center along the route servicing the Honolulu International Airport." A global search of the document is recommended to change to the new primary option of servicing the airport.

2-9 2.2 Build Alternatives Sentence that states "The system would use steel wheel on steel rail technology."

Based on discussions above, change sentence to read "The system would use a form of fixed-rail technology." A "global" change throughout the document from "steel wheel on steel rail" to "fixed-rail" is recommended.

2-9 2.2.2 Build Alternatives Sentence that states "All parts of the guideway would be elevated, except near Leeward Community College, where it would be in exclusive right-of-way."

This presumes that it has already been determined that the maintenance and storage facility will be at LCC. Earlier in the document, it is indicated that the facility may instead be sited along Farrington Highway. A change from "Leeward Community College" to "the system's maintenance and storage facility" is suggested. A better solution might be a short extension (eventually part of the West Kapolei line) from the westernmost terminus of the MOS into Kalaeloa that could accommodate a facility sited on the flat land that is being acquired by the state. This could be cheaper to build and sooner to be in operation than a facility near LCC.

2-19 End of second paragraph on left Change "assumed in to be place" to "assumed to be in place"

Self-explanatory.

2-19 Transit Technology Replace first sentence with more general wording.

Recommend that first sentence read "The selected transit system will be a form of fixed-rail powered by electricity (Figures 2-9A through 2-9C depict the type of guideway required for each rail technology)."

2-20 Figure 2-9 Example Vehicle on Elevated Guideway

This figure's title should be changed to "Example Steel Wheel on Steel Rail or Rubber Tire on Concrete Vehicle on Elevated Guideway" and the graphic listed as Figure 2-9A. Figures 2-9B and 2-9C should be added and show the guideways for Conventional Monorail and Elevated Magnetic Levitation systems. If the EIS is left as is, and this graphic becomes part of the specifications in any bid or Request for Proposals—leaving suppliers required to build an elevated guideway of 28-32 feet wide—the monorail and mag-lev cost advantages are negated. These two systems are capable of operating on much narrower (and, therefore, less costly and obtrusive) guideways.

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Page	Paragraph Title (abbreviated)	Statement on Which Comment is Based
	Comment and Rationale	

2-38 Vehicle Maint. and Storage Facility — Discussion of LCC site.

It needs to be pointed out that a considerable amount of leveling is required to flatten the ground for a site adjacent to Leeward Community College. It should be noted that this will add to overall system costs.

3-27 Figure 3-9 — A.M. Peak-Period Transit Travel Times

The figure reflects times based on local operations (i.e., stops at every station). There must be thought given to some form of express service, and this must be done before the start of construction for the first segment of the MOS. Station bypasses by express trains, which would increase costs, are the best type of express service; however, consideration should at least be given to skip-station operations during rush hours. Every effort should be made to halve rush hour transit times in 2030 between West O'ahu and destinations in Downtown and Waikiki, to ensure that commuters will see substantial gains from transit use (including time from home to departure station and arrival station to destination) over operation of their privately owned vehicles.

3-39 Table 3-21 — Column Placement Effects on Streets and Highways

The figure title should be changed to "Column Placement Effects on Streets and Highways for the Steel Wheel on Steel Rail Bridge" and additional tables should be made for other rail forms. The summary is likely to be different, particularly for monorail and mag-lev guideways.

3-42 Table 3-23 — Potential Effects on Parking due to Fixed Guideway Column Placement

The figure title should be changed to "Potential Effects on Parking due to Fixed Guideway Column Placement for the Steel Wheel on Steel Rail Bridge" and additional tables should be made for other rail forms. The summary is likely to be different, particularly for monorail and mag-lev guideways.

3-50 Construction Phasing — Wording on phasing of construction

Reword to indicate airport routing first, based on City Council route change.

4-5 Table 4-1 — Acquisitions, Displacements, and Relocations

Identify this table as applying to SWSR systems, and add tables reflecting what the acquisitions and displacements numbers would be for other forms of rail.

4-5 Table 4-1 — Community Services and Facilities

Identify this table as applying to SWSR systems, and add tables reflecting what the partial acquisitions and displacements numbers would be for other forms of rail.

4-8 Table 4-1 — Noise and Vibration

Identify this table as applying only to SWSR and rubber tire on concrete systems, and make a statement that noise mitigation measures are not necessary for monorail and mag-lev systems.

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Page	Paragraph Title (abbreviated)	Statement on Which Comment is Based
	Comment and Rationale	

4-9 Table 4-1 Street Trees

Identify the numbers in this table as applying only to SWSR and rubber tire on concrete systems, and provide new calculations (which are likely to be fewer) for monorail and mag-lev systems.

4-33 Cemeteries Typo in second sentence.

Change "...Stadium-Cand.." to "...Stadium and..."

4-36 Airport Alternative Change "Airforce" to "Air Force"

Proper usage.

4-39 4.5.2 Affected Environment – Neighborhoods

In second paragraph, second sentence, change "White" to "Caucasian" as better usage.

4-42 Table 4-8 Year 2000 Demographic Characteristics...

Suggest heading changes from "White" to "Caucasian" and "Black" to "African-American" as better usage in table and accompanying text on page.

4-45 Ala Moana-Kaka'ako Change "...(TOD) is..." to "...(TOD) are..."

Self-explanatory.

4-47 Regulatory Context Change "...statues,..." to "...statutes,..."

Self-explanatory.

4-47 Defining Environmental Justice Areas Change "...Black,..." to "...African-American,..."

See above on usage; note how it fits better with other terms.

4-51 Table 4-9 Demographic Characteristics of O'ahuMPO...

Suggest heading changes from "White" to "Caucasian" and "Black" to "African-American" as better usage.

4-65	Figure 4-17	Viewpoint 1; and
4-66	Figure 4-18	Viewpoint 2; and
4-72	Figure 4-24	Viewpoint 8; and
4-75	Figure 4-27	Viewpoint 11; and
4-76	Figure 4-28	Viewpoint 12; and
4-80	Figure 4-32	Viewpoint 16; and
4-84	Figure 4-36	Viewpoint 20

These conceptual graphics do not appear to be in scale with the graphic in Figure 2-9, which indicates that the SWSR bridge will be 28-32 feet wide. These figures seem to indicate a guideway only slightly wider than the (5-foot wide) vehicles below. Note the relatively narrow shadow of the guideway in Figure 4-27. Viewpoint 20 seems a little closer to what is expected to be the guideway's

width, but still appears too narrow based on its shadow against the length of the vehicle below. These conceptual graphics need to be redone to more accurately reflect the width of the guideway; the addition of overhead views is suggested. Similar renderings will be needed for monorail and mag-lev guideways.

4-91 Salt Lake Alternative First full paragraph on right
Change "...views along the steam..." to "...views along the stream..."

4-95 4.8.2 Last two sentences of last paragraph.
Should "...Improvement Plan..." be "...Improvement Program...?"

4-97 Figure 4-37 Typical Sound Levels
The term "rail" in two places should be changed to "steel wheels on steel rails" and 50-foot readings should be added for the other three rail systems: rubber tires on concrete, monorail, and magnetic levitation. Discussion of the noise levels of these technologies should be added throughout the Section 4.9.1 discussion.

4-100 Table 4-15 Number of Residential Buildings, Parks, and Schools with Noise Impacts; and
4-101 Table 4-16 Noise Impacts
The term "Created by Steel Wheel on Steel Rail Systems" should be added to the title of both tables, as well as Figures 4-39, 4-40, 4-41, and 4-42 on subsequent pages. Further study should be initiated to create tables and figures for the other three rail technologies.

4-108 Electric and Magnetic Fields Effect of HSST mag-lev needs to be evaluated
Since magnetism is used to levitate the train, effects of the HSST mag-lev should be included in this specific area. The HSST supplier has testified to the Honolulu City Council that the system has no effect on passengers with pacemakers, so minimal impact is anticipated.

4-137 Table 4-29 Summary of Street Tree Effects/Transplanting...
The number of trees requiring removal or transplanting might be considerably less for the much narrower guideways needed for monorail and mag-lev systems; added tables are needed.

4-149 Table 4-32 Airport Alternative grouping; and
4-150 Table 4-32 Airport & Salt Lake Alternative grouping
Change "CINCPACFLT" and "CINCPAC" to "COMPACFLT" and "PACFLT" respectively in both places. The Commander of the U.S. Pacific Fleet is no longer referred to as a Commander in Chief.

4-166 4.18.2 Station Area Development
The first sentence needs to be updated relative to TOD ordinance in 2008.

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4-166 4.18.2 'Ewa Plain, East Kapolei, UH West O'ahu, and Ho'opili
The Hunt Development Group may have pulled out of its agreement with UH; paragraph needs update.

4-171 Table 4-36 First entry: Ka Makana Ali'i
May need an update; is DeBartolo still involved in this development?

5-3 5.2 Description of the Project
Change "...steel-wheel-steel-rail..." in the last sentence of the first paragraph to "...fixed-rail..." to ensure that a subsequent competition remains open to suppliers of all forms of rail that met the City's criteria in the RFI.

5-3 5.3 Next to last line on right side of page.
Change "...affects..." to "...effects..."

5-8 Table 5-2 Airport Alternative grouping; and
5-9 Table 5-2 Airport & Salt Lake Alternative grouping
Change "CINCPACFLT" and "CINCPAC" to "COMPACFLT" and "PACFLT" respectively in both places. The Commander of the U.S. Pacific Fleet is no longer referred to as a Commander in Chief.

5-24 Measures to Minimize Harm Guideway design as narrow as possible.
This statement must be challenged because earlier in the document it is specifically shown as 28-32 feet across. The City is well aware that narrower guideways can be used for both the monorail and mag-lev systems. Since width is a concern, the City must allow suppliers of all forms of fixed-rail to compete. This comment also applies to paragraphs of the same name on pages 5-25, 5-26, and 5-28.

6-3 Table 6-1 Capital Cost Estimates for the Build Alternatives...
This table, in fact, this whole chapter and tables reflect costs associated only with SWSR systems. Similar tables, along with discussion, must be developed for the other forms of fixed-rail transit.

6-4 General Excise and Use Surcharge Discussion of 0.5 percent surcharge
A sentence needs to be added at the end of this paragraph: "The amount collected through the GET surcharge currently is reduced by ten percent, which goes into the general fund handled by the State Legislature." No relief is anticipated; in fact, the legislature may consider moving all surcharge collections into the general fund for a period of time.

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6-7 Fare Revenues — Fare box recovery ratio

Operating and maintenance (O&M) costs for the HSST mag-lev are estimated to be considerably less than any SWSR system. Based on the City Council resolution for revenues to be maintained between 27 and 33 percent of annual O&M costs, the average fare for passengers will be less with the HSST. Conversely, increasing the percentage from the fare revenues—based on use of the HSST—to equal what would have been required with an SWSR system would reduce the transit subsidy. It should be noted that City O&M estimates seem to have increased considerably from earlier figures. The City's "Honolulu Rail Transit" brochure distributed throughout the (voting) community in 2008 indicated O&M at "about $60 million per year in today's dollars." Table 6-3 shows the following: for Salt Lake routing - $63 million in 2007, $123 million in YOE; for Airport routing - $68 million in 2007, $133 million in YOE; and for a combined Airport and Salt Lake alignment - $96 million in 2007, $187 million in YOE. HSST O&M is estimated between 20 and 30 percent less per year than SWSR; using 25 percent as an average, its advantage is as follows: for Salt Lake routing - $47.25 million in 2007, $92.25 million in YOE; for Airport routing - $51 million in 2007, $99.75 million in YOE; and for a combined Airport and Salt Lake alignment - $72 million in 2007, $140.25 million in YOE. Using YOE dollars for the now-selected Airport routing, 30-year savings with the HSST would be $997.5 million. If a dual Airport and Salt Lake alignment materializes, use of the HSST would save $1.4025 billion. O&M costs savings alone would enable guideway extension into Central O'ahu, a major ridership area.

6-11 System Operation — Project costs based on train operators

Perhaps all project costs should be recalculated based on fully automated train operations. No modern train system should be considered that requires train operators; there are enough necessary expenses, so the unnecessary expenses should be eliminated up front. Train operators in a grade-separated urban rail transit system are redundant in the 21st Century.

7-11 Important Trade-offs — Last paragraph

Needs to be rewritten, based on City Council action on the alignment.

541 Appendix C — Construction Process

This appendix needs to be rewritten to include construction processes for the non-SWSR fixed-rail systems.

596 Comment Sheet — From Hawaii Department of Transportation (DOT)

I strongly support DOT Comment Number 2 that elimination due to proprietary technology is not sufficient reason to eliminate alternatives to SWSR systems.

1045 D.R. Horton Schuler — Comments on scoping meetings.

The comment that "...Maglev systems are not only extravagantly expensive and untested in real-world public transit operational settings." is incorrect. Perhaps Mike Jones was referring to the high-speed mag-lev. The HSST urban mag-lev, compared to SWSR systems, is not only less expensive to build but also less expensive to operate and maintain. It also has been thoroughly tested in revenue service in Nagoya, Japan for almost four years. Renderings of the proposed Ho'opili development in

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West O'ahu show a train station inside a public (retail?) building. This is possible with the quiet mag-lev, but I would not recommend it for any SWSR system. Mr. Jones should reconsider his earlier comment.

1160 Frank Genadio — Start of my comments during scoping meetings.

I see nothing in these comments, covering the next three pages, that is contradictory to my current position on each subject. I see that at least a couple of state legislators recently brought up the issue of possibly taking a look at nuclear power. It is about time, and all forms of alternative energy should be "on the table" for powering the transit system.

1494 Fixed Guideway Alternatives — "Comments on reducing the range of technologies under consideration are encouraged."

Seeing this statement again, after reading through the comments in the scoping meetings, makes one believe that the City really had little interest in public input. Despite the supposed restriction on not expressing preferences, I noticed that a number of people mentioned technology and advocated monorail and mag-lev—but there was not much mention of SWSR systems. Several people stressed limiting system noise. I even noticed (early) preference for monorail or mag-lev from a couple of people who seem to have changed their minds later, probably to keep their jobs (i.e., after the City administration decided that SWSR is the system of choice). If public comments are really to be considered in making transit decisions, why is it not even possible for the non-SWSR systems to compete?

1502 Project Alternatives Analysis Report — "No information was received that would eliminate one or more of the transit technologies currently under consideration."

The statement above, in a report dated May 30, 2007, followed City policy throughout the years of 2005-2007. Within the first two months of 2008, this policy disappeared as the City pressed for selection of a SWSR system, even including the "charade" of the (so-called) expert panel of four steel wheels advocates.

1571 Transit Advisory Task Force — "...structure for the fixed guideway would be only 26 feet wide,..."

Two points to note from the guideway width given as 26 feet in this paper: 1) The EIS graphic mentioned above indicates an SWSR guideway of at least 28 feet; and 2) The guideway for the HSST mag-lev would be only 21 feet wide—including open space between the beams. (NOTE: I have no information for conventional monorail; presumably, its guideway also would be narrower than the steel wheels bridge.)

1571 Transit Advisory Task Force — Costs for the guideway

Apparently, the task force received data from the city to determine costs for extensions of the system. These costs are obviously based on SWSR systems—and are considerably higher than what would be needed for the HSST mag-lev guideway. Since the date of this report is December 11, 2006, why did this task force only show costs for SWSR, or why did DTS provide only such data?

Specific Comments on Draft Environmental Impact Statement - Frank Genadio

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1715 Transit Scoping Meeting Comments My personal comments

Pages 1715 (A210)-1718 (A213) are comments I made on the scoping meetings. At that time, I was fully supportive of the City's transit project and fully expected to see a fair and open competition among all forms of fixed-rail. Other than my disappointment at the City's (apparent) refusal to open the competition—with closing it obviously making my advocacy for the mag-lev irrelevant—I see nothing that I would wish to change in my comments. With added park-and-ride lot surface, the amount of solar power generated can be even greater than stated in these older comments.

App. E City Correspondence Letters to those who commented.

The City's standard response in letters to those who commented on technology during the scoping process states the following: "Vehicle and system technologies will not be selected prior to the draft Environmental Impact Statement. Comments about issues related to vehicle and system technologies will be considered when specifications are developed." Each of these letters was signed by Melvin N. Kaku, Director (at that time) of the Department of Transportation Services. In effect, the City has contradicted its own statements made in 2006 by eliminating non-SWSR system technologies long before publication of the draft EIS. If this does not violate the letter of FTA guidelines, it certainly violates the spirit. Basically, the City deferred any discussion relative to technology through 2007 as being too early for analysis. It then quickly convened an uncalled for (so-called) expert panel, which selected SWSR as the technology in a week that included only two public meetings, and then treated SWSR as the only technology to be considered—even though it never received more than four positive (of nine possible) votes in any meeting of the Honolulu City Council. The whole process has been tainted by maneuvering and insincerity by the City administration—and must be re-accomplished.

DEPARTMENT OF TRANSPORTATION SERVICES

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May 21, 2010

RT2/09-297854R

Mr. Frank Genadio
92-1370 Kikaha Street
Kapolei, Hawaii 96707

Dear Mr. Genadio:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address comments regarding the above-referenced submittal:

As stated in Section 2.2.3 of this Final EIS, the NEPA Notice of Intent requested input on five transit technologies. A technical review process that included the opportunity for public comment was used in parallel with the alignment analysis to select a transit technology. The process included a broad request for information that was publicized to the transit industry. Transit vehicle manufacturers submitted 12 responses covering all of the technologies listed in the Notice of Intent. Rubber tire on concrete systems, such as the Phileas system, were evaluated by a five-member panel appointed by the City Council that considered the performance, cost, and reliability of the proposed technologies. The panel accepted public comment twice as part of its review. By a four-to-one vote, the panel chose a steel wheel operating on steel rail system. The four panel members selected steel-wheel technology because it is mature, proven, safe, reliable, economical, and non-proprietary. Proprietary

technologies, meaning those technologies that would have required all future purchases of vehicles or equipment to be from a single manufacturer, were eliminated because none of the proprietary technologies offered substantial proven performance, cost, and reliability benefits compared to steel wheel operating on steel rail. Selecting a proprietary technology also would have precluded a competitive bidding process, likely resulting in increased overall project costs. The panel's findings were summarized in a report to the City Council dated February 22, 2008.

Magnetic levitation and monorail require a different guideway design that would have different impacts from a steel wheel on steel rail system. The guideway design and the impact analysis are being completed for the steel wheel on steel rail technology that will be used for the Project. As previously stated, other forms of fixed rail were eliminated in the scoping process and analysis of impacts to properties has been conducted for the steel wheel on steel rail technology chosen for the Project.

No comparative magnetic levitation project has ever been built within the U.S. Therefore, no data is available to support a cost estimate. Some of the savings recognized in other countries for beam-track vehicles would not apply in the U.S. because of requirements to include an emergency egress walkway. Also, the smaller structures proposed in the comment result in shorter span-lengths, which increases the number of columns required and the cost to construct both the additional foundations and columns.

The HSST system operators have declined to make operating expenses available. Thus, with no comparative data available to support an operating cost estimate, there is no means to verify this statement regarding maglev's operating and maintenance costs compared to steel wheel.

There is no plan to implement express service, but if future operations indicate that it would be beneficial, the system could operate in skip-stop service. With the Project, trains will operate every 3 minutes in each direction during peak periods. Once on the system, it will take 42 minutes to travel from East Kapolei to Ala Moana Center. Skip-stop service could decrease travel time by a few minutes. The system will be capable of fully automated operation.

The following paragraphs address your Specific Comments on the Draft EIS:

7 Purpose of the Draft EIS: DTS and FTA requested information during scoping that would inform the technology selection process. No new meaningful information was received. As discussed previously, an open technology selection process was conducted during development of the Draft EIS in February 2008 and multiple panel meetings were held that were open for public comment as part of the review. The Final EIS documented the selection in Section 2.2.3.

8 Purpose of the Draft EIS: The Final EIS has been revised to address the identification of the Airport Alternative as the preferred alternative, in particular see Section 2.4, Preferred Alternative Identification Process.

S-4 Alternatives Considered: The City Council never enacted a technology selection bill resulting in the City accepting the findings of the panel. The suggested text edit in this comment has not been deleted from the Final EIS.

S-7 Noise and Vibration: Noise impacts and mitigation are evaluated for the steel wheel on steel rail technology. Parapet walls, wheels skirts, and sound absorptive materials are included in the project costs in Chapter 6 of the Final EIS. The suggested text edit in this comment has not been incorporated into the Final EIS.

2-3 2.1.1 Screening: Fixed guideway is not an emerging rail concept. The proposed language was not added because it does not provide any additional clarity regarding the guideway as a rail concept.

2-7 Table 2-2 Alternatives: As stated previously, proprietary technologies, meaning that selecting one of those technologies would require all future purchases of vehicles or equipment to be from a single manufacturer, were eliminated for good cause. These were eliminated because none of the proprietary technologies offered proven performance, cost, and reliability benefits compared to steel wheel on steel rail. The text has not been revised in the Final EIS.

2-8 2.1.3 Alternatives Consideration: The single operating urban magnetic levitation system has a maximum speed of 100 kilometers per hour (62 miles per hour) which is similar to the maximum operating speeds of 50 to 60 miles per hour for steel wheel on steel rail systems. While the system is quieter, other systems may be designed to match the noise level of magnetic levitation when in operation. There is no safety improvement from the traction design. The assumed visual and cost savings benefits for beam-track vehicles would not apply in the U.S. because of requirements to include an emergency egress walkway. Also, the smaller structures result in shorter span-lengths, which increases the number of columns required and the percentage of views blocked by support structure. In addition, the greater number of columns required increases the cost to construct both the additional foundations and columns. No comparative project has ever been built within the U.S. Therefore, no data is available to support a cost estimate. With no comparative data available to support an operating cost estimate, there is no means to verify this statement. The HSST system operators have declined to make operating expenses available. Thus, with no comparative data available to support an operating cost estimate, there is no means to verify this statement.

2-9 2.2 Alternatives Evaluated in the EIS: The Final EIS has been revised to reflect the identification of the Airport Alternative as the Preferred Alternative.

2-9 2.2 Build Alternatives: The system will use steel wheel on steel rail technology. Therefore, the EIS will not be revised as requested.

2-9 2.2.2 Build Alternatives: The Leeward Community College Station will be at-grade independent of where the maintenance and storage facility site constructed.

2-19 End of second paragraph on left: The correction has been made in Chapter 2 of the Final EIS and the sentence now reads "...assumed to be in place...".

2-19 Transit Technology: The suggested wording was not changed because the steel wheel on steel rail is the technology analyzed in the Final EIS.

2-20 Figure 2-9: The suggested changes were not made because the steel wheel on steel rail is the technology analyzed in the Final EIS.

2-38 Vehicle Maintenance and Storage Facility: Earthwork is included in the project cost estimate that is in the basis for Chapter 6 of the Draft and Final EISs.

3-27 Figure 3-9: This figure has been revised and now appears as Figure 3-7, A.M. Peak-Period Transit Travel Times by Travel Market—Existing Conditions, No Build Alternative, and the Project, in this Final EIS. This figure shows that the fixed guideway system will provide travel time benefits during the a.m. two-hour peak period. This figure represents travel times from origin to destination. Station-to-station travel time is provided in Table 3-16, Fixed Guideway Station-to-Station Travel Times, in this Final EIS. Trains will operate every 3 minutes in each direction during peak periods. Once on the system, it will take 42 minutes to travel from East Kapolei to Ala Moana Center. All trains are anticipated to stop at all stations. Skip-stop service would not provide substantially improved travel times for most users and could be a source of confusion for some riders; however, skip-stop service could be implemented if warranted.

3-39 Table 3-21: The suggested changes for Table 3-21, Column Placement Effects on Streets and Highways, were not made because the steel wheel on steel rail is the technology analyzed in this Final EIS.

3-42 Table 3-23: The suggested changes for Table 3-23, Effects on Traffic near Park-and-Ride Facilities and Bus Transit Centers—Existing Conditions, No Build Alternative, and the Project (without and with mitigation), were not made because the steel wheel on steel rail is the technology analyzed in this Final EIS.

3-50 Construction Phasing: Section 3.5.7, Mitigation of Construction-Related Effects, was revised in the Final EIS to reflect the identification of the Airport Alternative as the Preferred Alternative.

4-5 Table 4-1: The suggested changes for acquisitions, displacements, and relocations (Table 4-1, Summary of Direct Environmental Effects and Mitigation Measures to Avoid, Minimize, or Reduce Impacts) were not made because the steel wheel on steel rail is the technology analyzed in this Final EIS.

4-5 Table 4-1: The impacts to community services and facilities were only analyzed for the technology of steel on steel rail. The suggested changes were not made to Table 4-1, Summary of Direct Environmental Effects and Mitigation Measures to Avoid, Minimize, or Reduce Impacts.

4-8 Table 4-1: The noise and vibration analysis conducted for this project only applies to steel on steel rail and were not conducted, nor will be conducted for other types of rail. The

suggested changes were not made to Table 4-1, Summary of Direct Environmental Effects and Mitigation Measures to Avoid, Minimize, or Reduce Impacts.

4-9 Table 4-1: Steel on steel technology is the chosen technology for this project. Impacts to street trees were only analyzed regarding the impacts from this technology. The suggested changes were not made to Table 4-1, Summary of Direct Environmental Effects and Mitigation Measures to Avoid, Minimize, or Reduce Impacts.

4-33 Cemeteries: The sentence under the Cemeteries heading in Section 4.5.2, Affected Environment [Community Services and Facilities] has been revised in this Final EIS to correctly state, "One cemetery near Aloha Stadium and one near Waimano Home Road are adjacent to the project alignment."

4-36 Airport Alternative: The correction for Hickam Air Force Base has been made in Section 4.5.3, Environmental Consequences and Mitigation [Community Services and Facilities] of this Final EIS.

4-39 4.5.2: The term "White" is used in the Final EIS, which is consistent with usage by the U.S. Department of Transportation's Order 5610.2 and the U.S. Census Bureau.

4-42 Table 4-8: The terms used in this Final EIS are consistent with usage by the U.S. Department of Transportation's Order 5610.2 and the U.S. Census Bureau.

4-45 Ala Moana-Kakaako: The sentence under Ala Moana-Kakaako heading in Section 4.6.3, Environmental Consequences and Mitigation [Neighborhoods], of this Final EIS has been revised to state, "Kakaako has been designated a redevelopment area, which may result in a change in character along the Project alignment. However, substantial development has recently occurred in the neighborhood; several high-rise condominium developments have been built, and additional residential and commercial developments are planned. The elevated transit structure will not create a barrier to pedestrian or other modes of travel."

4-47 Regulatory Context: In Section 4.7.1, Background and Methodology [Environmental Justice] of this Final EIS, under the heading Regulatory Context, the sentence has been revised to state, "Additional laws, statutes, guidelines, and regulations that relate to EJ issues include the following..."

4-47 Defining Environmental Justice Areas: The term "Black" is used, which is consistent with usage by the U.S. Department of Transportation's Order 5610.2 and the U.S. Census Bureau.

4-51 Table 4-9: The terms used in Chapter 4 of this Final EIS are consistent with those defined by the U.S. Department of Transportation's Order 5610.2 and the U.S. Census Bureau.

As stated in Section 4.8, Visual and Aesthetic Conditions, of this Final EIS, the simulations are intended to represent the scale and spatial relationships of project elements to other objects. These simulations serve several purposes: they were used to evaluate visual

and aesthetic consequences, demonstrate the potential for mitigation, and provide a means of communicating the findings of the analysis. The simulations generally depict that the guideway (technology) would have a comparatively greater visual effect on the visual environment. The stations that were simulated for the visual assessment generally depict those that are expected to have a comparatively greater visual effect (see Figure 4-31 for the Chinatown Station and Figure 4-34 for the Downtown Station). Figure 2.12, Example Vehicle on Elevated Guideway (Cross-section) in this Final EIS, Section 2.5.2, Transit Technology, is a cross-section view that is intended to more accurately show the guideway dimensions. DTS has considered your request for additional station simulations. However, it was determined that the existing simulations presented in the Final EIS adequately represent the Project.

4-91 Salt Lake Alternative: The text related to views along Moanalua Stream does not require a change in the Final EIS since the Salt Lake Boulevard Alternative is not discussed in the Final EIS.

4-95 4.8.2: In regards to Section 4.9.2, Affected Environment [Air Quality], in the Final EIS, "Transportation Improvement Plan" is appropriate because it is in reference to the plan and the text will not be revised to "Program" in the Final EIS.

4-97 Figure 4-37: Noise impacts and mitigation were evaluated for the technology of steel wheel on steel rail. Because this is the transit technology analyzed in the document, it is appropriate to use the term "Rail" in Figure 4-51 Typical Sound Levels in the Final EIS.

4-100 and 4-101 Tables 4-15 and 4-16: The other three rail technologies are not being studied in the Draft or Final EIS. Related tables and figures have not been revised.

4-108 Electric and Magnetic Fields: Because magnetic levitation technology is not being considered as part of the Draft or Final EISs, the suggested changes have not been incorporated into the document.

4-137 Table 4-29: Magnetic levitation and monorail require a different guideway design that would have different impacts from a steel wheel on steel rail system. The guideway design and the impact analysis are being completed only for the steel wheel on steel rail technology that will be used for the project.

4-149 and 4-150 Table 4-32: Property names in this table refer to the names of historic properties listed in or determined eligible for listing in the National Register of Historic Places as identified in the Honolulu High-Capacity Transit Corridor Project Historic Resources Technical Report (RTD 2008o). Names used to identify historic properties in the National Register or in Section 106 documentation may not correlate with current names. Names may reflect previous uses and/or owners, or may relate to the property's historic significance, such as the CINCPAC Headquarters building. Accordingly, neither edit has been made to this Final EIS.

4-166 4.18.2: The Final EIS has been updated to include the recent changes in the TOD ordinance. The TOD ordinance is discussed in Section 4.19.2, Indirect Effects, of this Final EIS.

4-166 4.18.2: Hunt Development Group was deleted from Section 4.19.2, Indirect Effects, of this Final EIS.

4-171 Table 4-36: Upon verification, Table 4-39, Planned and Foreseeable Actions in the Study Corridor, in the Final EIS has been updated and the reference DeBartolo has been deleted.

5-3 5.2: Section 2.1.3 of the Draft EIS explains that steel wheel on steel rail was the technology chosen for analysis. No other forms of rail are being analyzed in the Draft or Final EISs.

5-3 5.3: "Affects" has been changed to "effects" in the Final EIS, Section 5.4. The sentence now states, "....presents effects to these 81 historic resources, as established by current consultation."

5-8 and 5-9 Table 5-2: As discussed above, property names in this table refer to the names of historic properties listed in or determined eligible for listing in the National Register of Historic Places. "CINPACFLT" refers to the historic landmark. While the Commander may no longer be called, "Commander in Chief", the National Historic Landmark is listed as "CINCPAC".

5-24 Measures to Minimize Harm: The smaller structures proposed in the comment result in shorter span-lengths, which increases the number of columns required and the cost to construct both the additional foundations and columns. The proposed 120 to 150 foot span lengths would require a larger structure, similar to the steel wheel on steel rail system.

6-3 Table 6-1: Other technologies are not being studied in the Draft or Final EISs. Chapter 6 has not been revised to reflect other technologies.

6-4 General Excise and Use Surcharge: The amount of County General Excise and Use Tax (GET) Surcharge revenues withheld by the State has not been included in the revenue estimates. The surcharge collections are not being re-directed by the State. The Final EIS presents only information on funding that will go towards the Project.

6-7 Fare Revenues: The HSST technology was evaluated and rejected as expensive to build and costly to operate by a technical panel of experts in transit systems, as noted in Chapter 2 of the Draft EIS. The claims in the comment have not been substantiated by any revenue service operation. There are still too many elements of HSST technology that are not sufficiently developed or understood for the Honolulu community to adopt it as a primary transportation system. By contrast, steel wheel on steel rail technology is proven and cost-effective in today's transit industry.

6-11 System Operation: Comment noted. All operating costs include a driver, though the system will be designed to allow for automation. The decision to use an operator or not will be made at a later date.

7-11 Important Trade-offs: The chapter has been revised to reflect selection of the Airport Alternative as the preferred alternative.

541 Appendix C: The suggested changes were not made to Draft EIS Appendix C, Construction Approach (Final EIS Appendix E Construction Approach) because steel wheel on steel rail is the selected technology that is being analyzed in the Draft and Final EIS.

596 Comment Sheet: The comment from the Hawaii State Department of Transportation (HDOT) was in reference to phrasing in an early administrative draft of the EIS, which was changed in the Draft EIS. HDOT did not comment on the selection of a technology. As discussed in Section 2.2.3 of the Final EIS, a five-member panel appointed by the City Council and Mayor considered the performance, cost, and reliability of the proposed technologies. By a four-to-one vote, the panel selected steel wheel operating on steel rail as the technology for the Project because it is mature, proven, safe, reliable, economical, and non-proprietary. Technologies other than steel wheel on steel rail were eliminated for because they are proprietary technologies, meaning that selection of one of those technologies would require all future purchases of vehicles or equipment to be from a single manufacturer. These were eliminated because none of the proprietary technologies offered substantial proven performance, cost, and reliability benefits compared to steel wheel on steel rail.

1045 D.R. Horton Schuler: There is a single operating urban magnetic levitation system in the world, in Japan, and having opened for operation in 2004, has only five years of operating record. The technology is unproven.

1160 Frank Genadio: The energy mix for electricity generation of the system will depend on HECO's power production. As stated in Chapter 4, Section 4.11.3, Environmental Consequences and Mitigation [Energy and Electric and Magnetic Fields], the Project will consume approximately 1 to 2 percent of the total projected electricity generated on Oahu in 2030. The planned electricity generation capacity on Oahu will be sufficient to support the transit system, but the electricity distribution system will require various updates to support the system. Integration of photo-voltaic cells into project features could reduce net project electricity demand.

1494 Fixed Guideway Alternatives: DTS and FTA requested information during scoping that would inform the technology selection process. The information submitted was reviewed and incorporated into the selection process.

1502 Project Alternatives Analysis Report: Comments regarding the technology selection history are noted.

1571 Transit Advisory Task Force: The smaller structures proposed result in shorter span-lengths, which increases the number of columns required and the cost to construct both the additional foundations and columns. To match the Project's 120 to 150 foot span lengths and other requirements, such as an emergency walkway, the structure would be of similar size to the Project's.

1571 Transit Advisory Task Force: Comments regarding magnetic levitation are noted.

1715 Transit Scoping Meeting Comments: Surface park-and-ride lots could include covers that could be used for photovoltaic cells. This will be considered during final design of the Project.

Appendix E City Correspondence: Scoping for the Draft EIS in March of 2007 requested comments on technologies. Selection of technology occurred during the Draft EIS process; the selection was conducted as an open process with multiple panel meetings open to the public during February 2008, and the Draft EIS documented the selection.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Issuance of the Record of Decision under NEPA and acceptance of the Final EIS by the Governor of the State of Hawaii are the next anticipated actions and will conclude the environmental review process for this Project.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

General Growth Properties, Inc.

December 3, 2008

Mr. Ted Matley
FTA Region IX
201 Mission Street, Suite 1650
San Francisco, CA 94105

Mr. Wayne Y. Yoshioka, Director
Department of Transportation Services
City and County of Honolulu
650 South King Street, 3rd Floor
Honolulu, HI 96813

Dear Mr. Matley and Mr. Yoshioka,

General Growth Properties (GGP) has begun its review of the Honolulu High-Capacity Transit Corridor Project Draft Environmental Impact Statement/Section 4(f) Evaluation and is aware of the request for comments by January 7, 2009.

GGP's properties at Ward Centers and Ala Moana Center will both be impacted by the transit project. We request an extension of the comment deadline to allow us to fully study the impacts. An extension is needed to allow sufficient time to review all of the documents and secure the assistance of any necessary consultants. The current timeframe for review runs through a very busy holiday period, which will make it difficult for affected businesses and residents to provide meaningful input.

We respectfully request that the deadline for comments be extended by an additional 75 days to March 23, 2009. Thank you for your consideration of this request.

Sincerely,

Jan Yokota
Vice President-Development, Hawai'i Region

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DEPUTY DIRECTOR

June 11, 2010

RT12/08-290456R

Ms. Jan Yokota
General Growth Properties
1441 Kapiolani Boulevard
Suite 202
Honolulu, Hawaii 96814

Dear Ms. Yokota:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

The comment period duration was extended by 30 days to a total duration of 75 days. The regulations at 23 CFR 771.123(i) mandate a comment period of not less than 45 days. The 75-day period was longer than the 45- to 60-day periods typical for U.S. DOT Draft EIS documents and mandated regulations.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

GGP General Growth Properties, Inc.

February 5, 2009

Via Certified Mail - Return Receipt Requested and Commercial Delivery Service

Department of Transportation Services
City and County of Honolulu
650 South King Street, Third Floor
Honolulu, Hawai'i 96813

Re: Honolulu High-Capacity Transit Corridor Project Draft Environmental Impact Statement

Ladies and Gentlemen:

Thank you for the opportunity to submit comments on the above Draft Environmental Impact Statement ("EIS"). These comments are being submitted to you by General Growth Properties, Inc., on behalf of its affiliates with an ownership interest in property proposed to be included in or affected by the Honolulu High-Capacity Transit Corridor Project. These properties include Ala Moana Center, Ala Moana Plaza, Ala Moana Building, Ala Moana Pacific Center and the Ward properties.

First, we would appreciate copies of the following documents and reserve the right to submit further comments based upon these materials:

- The Real Estate Acquisition Management Plan described on page S-6 of the Executive Summary of the EIS; and
- More detailed plans relating to the proposed Kaka'ako (Ward) and Ala Moana Stations.

We have the following comments with respect to the plans labeled as follows:

- Appendix A - Conceptual Alignment Plans and Profiles, Plan and Profile, Sta 1340+00 to Sta 1370+00 (Sheet 25 of 32)
- Appendix A – Conceptual Alignment Plans and Profiles, Plan and Profile, Sta 1370+00 to Sta 1401+26 (Sheet 26 of 32)
- Appendix B – Conceptual Right-of-Way Plans, Right-of Way Plan & Property Tabulation, Sta 1338+00 to Sta 1362+00 (Sheet 45 of 59)

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- Appendix B – Conceptual Right-of-Way Plans, Right-of-Way Plan & Property Tabulation, Sta 1362+00 to Sta 1386+00 (Sheet 46 of 59)
- Appendix B – Conceptual Right-of-Way Plans, Right-of-Way Plan & Property Tabulation, Sta 1386+00 to Sta 1401+26 (Sheet 47 of 59)

Based upon our review of the above plans, we believe that there will be significant impacts to our properties. These include, but are not limited to:

- the loss of a material number of parking stalls, which would affect the parking requirements in the real estate agreements with a number of tenants and could result in lease terminations and/or significant expenditures to replace this parking, if it can be replaced;
- complete or partial loss of the use of several buildings and parking structures, with the attendant loss in gross leasable area and net operating income;
- the loss of several driveways leading to Queen Street;
- the loss of the mechanical room that services the building that houses Ross Dress for Less, The Sports Authority, Marukai 99 Cent Store and Pictures Plus; and
- impacts to the future development potential of our properties.

In addition, it appears that a vertical circulation system may be needed through several levels of the Ala Moana Center parking deck for access to the transit line. Please confirm if this is the case. If so, there may be additional costs to GGP for security, custodial, maintenance and other expenses associated with the operation of the Ala Moana station.

It also appears that columns required to support the transit line are proposed to be built through a number of buildings on our Ward properties, at Ala Moana Center and the recently built expansion area, the Ala Moana Center parking deck, and the Ala Moana Building parking deck.

As a general observation, as previously discussed with the City, our traffic consultants have proposed other alternative routes in the area that would better serve the totality of Kaka'ako and reduce the economic impact to our properties, as well as reduce the number of businesses affected. We would be pleased to share these plans with you and discuss them at your convenience.

The EIS indicates that plans are conceptual and subject to change. Accordingly, our comments are also of a general nature and subject to amendment as the plans are finalized. In addition, we would appreciate the opportunity to work with you with respect to the methods of construction, the construction timeline, staging areas, utility relocation and related matters so that the impact upon our properties and the business conducted thereon is minimized to the greatest extent possible.

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We also have the following specific comments.

- Table 4-20 on page 4-114 of Chapter 04 of the EIS indicates that there is an unidentified above ground storage tank (AST) at 404 Ward Avenue (TMK no. 21050062), which is slated for full acquisition. Please note that the tank is a grease receptor for the restaurant, which is regularly emptied and maintained. Therefore, this site should not be considered a hazardous materials site. Please amend this table in the EIS accordingly.
- Table 4-31 on page 4-145 of Chapter 04 of the EIS titled "Potential Long-term Adverse Effects on Cultural Resources Related to Act 50" indicates that practices at Tio's (which is now Kanpai Bar and Grill) and California Rock-N-Sushi restaurants will be displaced. Please explain the type of practices that you anticipate will be displaced.
- Table 4-32 on page 4-149 of Chapter 04 of the EIS and Table 5-2 on page 5-8 of Chapter 05 of the EIS indicate that the Ala Moana Building (TMK no. 23039001) is a historic building. All references to this historic designation should be deleted unless you can provide verification that this designation has been properly granted.
- Sheet 45 of 59 of Exhibit B lists the TMK for 534 Ko'ula Street as 2-1-52:16. Our records indicate that the correct number is 2-1-53:16.
- Sheet 46 of 59 of Exhibit B lists the TMK for 335, 345 Kamake'e Street as 2-3-5:23. Our records indicate that the correct number is 2-3-005:13.
- Sheet 46 of 59 of Exhibit B lists the uses for 1020, 1030, 1044 and 1060 Kamake'e Street as commercial. There is a mix of commercial and industrial uses.

Please note that the tenants and other occupants of our properties may have comments as well and we do not purport to speak on their behalf.

Finally, the purpose of this letter is to comment upon the EIS in general terms. We have not attempted to outline all of the effects that the proposed project will or may have upon our properties, both current and future uses, such as those envisioned in the recently approved Master Plan for the Ward properties. We also note that the EIS does not adequately detail the measures, if any, proposed to minimize adverse impacts of the project on the properties and businesses affected. We reserve all of our rights and remedies, at law and in equity, in connection with the project and its effect upon our properties and the businesses conducted therein.

Thank you for the opportunity to comment on the Draft Environmental Impact Statement for the Honolulu High-Capacity Transit Corridor Project. We look forward to meeting with you to discuss our comments in greater detail.

Sincerely,

Jan S. Yokota
Vice President – Development, Hawai'i Region

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DEPUTY DIRECTOR

June 11, 2010

RT2/09-299170R

Ms. Jan Yokota
General Growth Properties, Inc.
1585 Kapiolani Boulevard, Suite 800
Honolulu, Hawaii 96814

Dear Ms. Yokota:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address comments regarding the above-referenced submittal:

Ward Avenue

It is acknowledged that General Growth has significant plans for redevelopment of properties in the Ward Properties area. The City has discussed the Project with General Growth and will continue to work with General Growth as the Project moves forward. To a substantial degree, coordination of the General Growth plans with the Project on affected properties could help mitigate parking and access concerns in the vicinity of the Kakaako Station. Mitigation measures related to acquisitions, displacements, and relocations are presented in Section 4.4.3 of the Final EIS and for parking in Section 3.4.7. For partial acquisitions, defined in Section 4.4.1 of the Final EIS, "For commercial properties, including situations where the commercial property could lose its function, full acquisition will be considered." The City's right-of-way managers will work with individual property owners to provide relocation services, "...to all affected business and residential property owners and tenants without discrimination; persons, businesses, or organizations that are displaced as a result of the Project will be treated fairly and equitably" in accordance with the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (Section 4.4.3).

Regarding development potential of General Growth properties, the implementation of the Project is likely to have a positive effect by coordinating the General Growth plans and the rail project. The likely effect of the Project on economic activity near the stations is positive based on the experience in other cities. Table 4-38 in the Final EIS shows the effect of rail on property values in various U.S. cities related to rail. The key to success is to coordinate the plans for both the development and the Project so they work together.

Ala Moana Center

Vertical circulation elements will be needed for a station entrance through the parking deck of the Ala Moana Center, as shown on Drawing No. RP024 of Appendix B of the Final EIS. The station will be at about 35 feet above Kona Street. As indicated in Section 4.6.3 of the Final EIS, ongoing coordination efforts with the public will help develop design measures that will enhance the interface between the transit system and the surrounding community. The City will meet with property owners to discuss concerns that arise from the process.

It is possible that columns could affect existing buildings in the Ward properties area. Given the changes General Growth has proposed for that area, the Project team will work closely with General Growth to ensure the best possible coordination of design of the guideway and future Ward Neighborhood Master Plan development.

Construction planning and phasing will be coordinated with nearby property owners and businesses. The Project will continue its public involvement and education programs throughout construction. Project representatives will work with businesses that will be affected during design and construction, as well as ensure that businesses and the general public are fully informed of current and upcoming activities.

Storage Tank

Thank you for providing this information. Site No. 7, Tio's Mexican Restaurant, has been removed from Table 4-22 in the Final EIS.

Cultural/Historic Resources

The properties referenced in your letter (Tio's and California Rock-and-Sushi) are no longer identified in the Final EIS as traditional cultural practices.

Under Section 106 of the National Historic Preservation Act (as amended), the effects of Federal undertakings to historic properties must be considered by the lead Federal agency. Historic properties are properties listed in or determined eligible for listing in the National Register of Historic Places. The Ala Moana Building was determined eligible for listing in the National Register during consultation with the State Historic Preservation Division (SHPD) and was documented as such in revised material for the Honolulu High-Capacity Transit Corridor Project Historic Resources Technical Report. It is worth noting that eligibility does not mean the resource will be listed. (Please see regulation 36 CFR 60 which authorizes the NHRP and regulation 36 CFR 63 which discusses determination of historic places.) Potential project impacts to the Ala Moana Building were re-evaluated in the Honolulu High-Capacity Transit Corridor Project Historic Effects Report (April 2009). In this report, no adverse effects to the Ala Moana Building were identified. Following consultation, the SHPD concurred with this finding. These determinations of effect and the SHPD's concurrence are documented in Section 4.15 of the Final EIS.

Rights-of-Way

According to the City and County of Honolulu's property tax records, the TMK for Koula Street (2-1-52:16) is correct as shown in the Draft EIS. There was no record of 2-1-53:16 in the City's records as of February 24, 2010.

The parcel number for 335, 345 Kamakee Street has been corrected to 2-3-005:13 in Appendix C of the Final EIS on Sheet 48 of 48.

The use of 1023, 1030, 1044, and 1060 Auahi Street has been updated to state "commercial/industrial" use in Appendix C of the Final EIS.

The existing land uses were determined through a windshield survey of the project corridor and verification of the City and County of Honolulu's property tax records in February 2010. The right-of-way plans were revised and included in the Final EIS.

Mitigation measures related to acquisitions, displacements, and relocations are presented in Section 4.4.3 of the Final EIS. As stated previously in this response, the City's right-of-way managers will work with individual property owners to provide relocation services to all affected business and residential property owners and tenants. Specific mitigation measures for individual properties and businesses will be developed on a case-by-case basis as the design progresses and the number of partial and full acquisitions is refined. All acquisitions will follow the requirements of the Federal Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 and the USDOT's implementing regulations of 49 CFR Part 24.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
Creation Date :	1/25/2009
Creator Affiliation :	
First Name :	Melissa
Last Name :	Goo
Business/Organization :	Moanalua High School: School Community Council
Address :	2894 Ala Ilima Street
Alternative Preference :	
Apt./Suite No. :	
City :	Honolulu
State :	HI
Zip Code :	96818
Email :	melissa_goo@notes.k12.hi.us
Telephone :	
Telephone Extension :	
Add to Mailing List :	Both
Submission Method :	Website
Other Submission Method :	
Submission Date :	01/25/2009

Submission Content/Notes : COMMENTS OF MELISSA GOO
REPRESENTING THE MOANALUA HIGH SCHOOL
SCHOOL COMMUNITY COUNCIL
ON THE DRAFT ENVIRONMENTAL IMPACT STATEMENT
FOR THE HONOLULU RAIL TRANSIT PROJECT
January 13, 2008

Thank you for the opportunity to submit comments on the Draft Environmental Impact Statement (DEIS) for the Honolulu Rail Transit Project.

My name is Melissa Goo. I chair and am speaking on behalf of the Moanalua High School (MoHS) School Community Council (SCC). MoHS is located in the Salt Lake neighborhood of urban Honolulu at 2825 Ala Ilima Street, Honolulu, HI 96818. The school was established in 1972 and serves approximately 2,000 students in grades 9 through 12.

The MoHS SCC was established pursuant to Act 51, Session Laws of the State of Hawaii 2004, also known as the Reinventing Education Act of 2004. The MoHS SCC enables Moanalua High School administrators, teachers, parents, students and representatives of the surrounding neighborhood to participate in the decision-making processes of the school. It is comprised of individuals elected by their peers to represent the school community in the interest of improving student achievement. The roles and responsibilities of the SCC include defining the school's vision and mission, reviewing and evaluating the school's Academic and Financial Plans (AFP), requesting waivers as appropriate from policies of the Hawaii State Board of Education (BOE) and Department of Education (DOE), participating in the selection and evaluation of principals, and playing a role in the development and revision of school policies. Finally, the SCC reports to the community and gathers feedback at forums held twice during the school year.

With respect to the DEIS for the transit project, the SCC has identified several benefits to the Moanalua High School community of building the transit system along the proposed Salt Lake Boulevard alignment. In conjunction with its responsibility to report to the community, the SCC is communicating these benefits to the Department of Transportation Services for potential inclusion in the final Environmental Impact Statement. The benefits are as follows:

- Students with geographic exemptions, who comprise approximately 20% of the student body, could ride transit to school and back home each day.
- Teachers and administrators who reside close to a transit station could ride transit back and forth to work each day.
- Transit could provide a cost-effective means of transporting students on field trips to locations of educational interest, e.g. museums and historical sites downtown.
- Students qualified to take college-level courses could use transit to travel to Leeward Community College, Honolulu Community College, Hawaii Pacific University, UH West Oahu, and eventually UH Manoa.

Thank you again for the opportunity to comment.

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, 3RD FLOOR
HONOLULU, HAWAII 96813
Phone: (808) 768-8305 • Fax: (808) 768-4730 • Internet: www.honolulu.gov

MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-334297

Ms. Melissa Goo
2894 Ala Ilima Street
Honolulu, Hawaii 96818

Dear Ms. Goo:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraph addresses your comments regarding the above-referenced submittal:

While each of the alternatives discussed in the Draft EIS includes trade-offs between benefits and impacts, the Airport Alternative from East Kapolei to Ala Moana has been selected as the Preferred Alternative as described above. As compared to the alternatives discussed in the Draft EIS, the Airport Alternative will carry the most passengers, provide the greatest transit-user benefits, and result in the fewest vehicle hours of delay. It will provide access to employment centers at Pearl Harbor Naval Base and Honolulu International Airport and will serve the Salt Lake neighborhood with connecting bus service. Of the three Build Alternatives addressed in the Draft EIS, the Airport Alternative will have slightly less impacts to the natural and built environment analyzed in the Draft EIS. During the public comment period on the Draft EIS, the public overwhelmingly supported the Airport Alternative. Of the comments that specifically supported one of the alternatives, more than 75 percent were in support of the

Airport Alternative. For more information this selection is discussed in Section 2.4 of the Final EIS. Since publication of the Draft EIS, design has been advanced, further analysis has been completed, and information has been added in response to comments on the Draft EIS and agency coordination. The Final EIS discusses the process that was used to select the Preferred Alternative, how comments were considered in the decision-making process, impacts and mitigation commitments.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

GOOD SAMARITAN CHURCH
OF JESUS CHRIST
P.O. Box 31029 • Honolulu, Hawaii 96820-1029
Pastor Isakara "Ike" Sataraka • Phone: (808) 581-5695

297982

DTS
650 S. KING ST.
HONOLULU, HI 96813

Dear Mr. Wayne Y. Yoshioka,
Enclosed is the list of our church members in support of the RMIL System.

Sincerely,

Mata A. Sua / Secretary

RECEIVED
09 FEB 3 AM 9:49
DIRECTOR'S OFFICE
DEPT OF
TRANSPORTATION SERVICES

"Not by might, nor by power but by my Spirit"
Saith the Lord of hosts. *Zechariah 4:6*

AR00001849

GOOD SAMARITAN CHURCH – MEMBER **JAN 8, 2009**

1. Pastor Isakara 'Ike' Sataraka
2. Elizabeth Sataraka
3. Tanu Sataraka
4. Tracie Sataraka
5. Andrew Sataraka
6. Isaac Sataraka
7. Toreka Sataraka
8. Nathan Sataraka
9. Veronica Sataraka
10. Shekinah Sataraka
11. Zion Sataraka
12. Patboone Anderson
13. Lynnette Talaimatai
14. Troy Talaimatai
15. Shalom Talaimatai
16. Shadrace Talaimatai
17. Terrance Sataraka
18. Petina Sataraka
19. Telika Sataraka
20. Sabine Sataraka
21. Truce Sataraka
22. Thuddes Sataraka
23. Silafaga Faleafine
24. Sam Tapasa
25. Miriam Tapasa
26. Summer Tapasa
27. Shiloh Tapasa
28. Shaddai Tapasa
29. Miriam Faaliga
30. Glassy Faaliga
31. Leauma laulu
32. Fuaao Laulu
33. Leauma Laulu Jr.
34. Simaevaga Laulu
35. Sakiasi Laulu
36. Daisy Laulu
37. Deborah Laulu
38. Sila Laulu
39. Faaofo Laulu
40. Zianna Laulu
41. Stephen Laulu
42. Rebecca Laulu
43. Penaia Laulu
44. Atimua Tuumalo

45. Pogisa Tuumalo
46. Taulagi Leano
47. Naoia Leano
48. Faanati Leano
49. Fidellia Leano
50. Felicidee Leano
51. Faith Leano
52. Pone Tuia
53. Veronica Tuia
54. Johnny Tuia
55. Taimane Tuia
56. Dora Leano
57. Molimau Leano
58. Pepe Maulupe
59. Lance Maulupe
60. Olive Maulupe
61. Ariani Maulupe
62. Amani Maulupe
63. Vaovai Sua
64. Malo Sua
65. Adelina Sua
66. Kalala Sua
67. Puleao Lemau
68. Talaleu Lemau
69. Sam Ioane
70. Silafaga Ioane
71. Hans Sua
72. Gloria Sua
73. Kingsten Sua
74. Kobe Sua
75. Kaleb Sua
76. Piliota Failauga
77. Lili Tuia
78. Laavale Maulupe
79. Violini Maulupe
80. Maria Tuaoa
81. Shadrrac Maulupe
82. Manase Faualo
83. Esther Faualo
84. Margaret Faualo
85. Maverick Faualo
86. Emmanuel Faualo
87. Faausu Maeva
88. Jane Maeva
89. Lance Lagafuaina
90. Samson Maeva

137. Fia Jennings
138. Wanda Jennings
139. Faileaso Jennings
140. Iakopo Maileoi
141. Anita Maileoi
142. Richard Maileoi
143. Kiwi Mailcoi
144. Ryan Maileoi
145. Alavina Maileoi
146. Patboone Anderson
147. Susana Anderson
148. Diana Anderson
149. Sanele Anderson
150. Kaiserlyn Anderson
151. Faleniu Anderson
152. Rhonda Anderson
153. Bernadine Anderson
154. Arnie Anderson
155. Elizabeth Anderson
156. Tauvavae Noa
157. Victoria Noa
158. Lucy Noa
159. Vai Lualemaga
160. Evelyn Lualemaga
161. Rimoni Tuiasosopo
162. Ionatana Pei
163. Elizabeth Pei
164. Eliana Pei
165. Eleanor Pei
166. Ezra Pei
167. Eisha Pei
168. Ethen Pei
169. Timoteo Pei
170. Shari Pei
171. Skyson Pei
172. Tisha Pei
173. Crystal Scanlan*
174. Tofiga Pei
175. Malaea Pei
176. Teuila Fitiausi
177. Jr. Fitiausi
178. Cornelius Fitiausi
179. Courtney Fitiausi
180. Cortessa Fitiausi
181. Corianne Fitiausi
182. Corey Fitiausi

HONOLULU RAIL TRANSIT

AUALA U'AMEA MO HONOLUL

Matou te manaomia sou manatu i le Aiaia o Amataga o le Fuafuaina o le Laufanua ma or Si'omiaga mo le Auala U'amea i Honolulu ne

O le Auala U'amea o se ala maualuga lea e feso'ota'i ai le itu i Sisifo o Oahu ma le taulaga i Honolulu faapea le fefa'atauaiga i Ala Moana. Ma o aoga nei:

- o le a fa'aleleia ai ala o femalaga'iina
- e fa'aitiitia ai le tele naunau o ta'avale
- o le a fa'apu'upu'uina ai taimi o femalaga'iga
- ma lagolagoina ai le fa'aopoopoina pea o tagatanu'u i Oahu nei

E mafai ona aumai sou finagalo i le Amataga o Fuafuaga o le Si'osi'omiaga

O le masina o Novema 21, 2008, e amata ai ona talia aloaia ai finagalo lautele o tagatanu'u e le City ma le County o Honolulu faapea le Ofisa o le Feterale. O le a taga'i lelei i ai le aofiaga o le ofisa lea ua ta'ua o le Draft EIS (e pei ona ta'ua i luga) o fea le tulaga e manuia ai ala ia e tolu ua fuafuaina. Tatala atu le avanoa e talia ai sau fautuaga mo le 45 aso, amata ia Novema 21, 2008, ae fa'agata ia Ianuari 7, 2009.

O fea e maua ai sa'u pepa/kopi o ia aiaiga (Draft EIS) i le gagana Peretania?

E maua i so'o se faletusi a le Setete po'o le City, so'o se Univesete, Ofisa o Femalagaina o lo'o i le 650 South King St, fogafale tolu, po'o le internet i le website www.honolulutransit.org.

E mafai fo'i ona maua fua sau DVD, pe faatonu sau pepa/kopi tusitusia lelei i le $59 i le gagana Peretania lava. Vala'au le telefoni (808) 566-2299 po'o le Internet fo'i, website e pei ona taua i luga. Ia ta'u i ai lou suafa, tuatusi, lau telefoni, ma le gagana o lo'o mana'omia.

E fa'apefea ona fai sa'u manatu i lea tulaga fa'ata'atia?

E mafai ona e faia fa'apea:

1) [illegible]

2) E mafai ona fa'aleo sou manatu/taofi i se iloiloga a le aotelega le a saunia lea e le City. O aso o ia fono o le a fa'asilasila atu i l Honolulu Advertiser ma le Honolulu Star Bulletin, ma luga o l Inernet i le www.honolulutransit.org

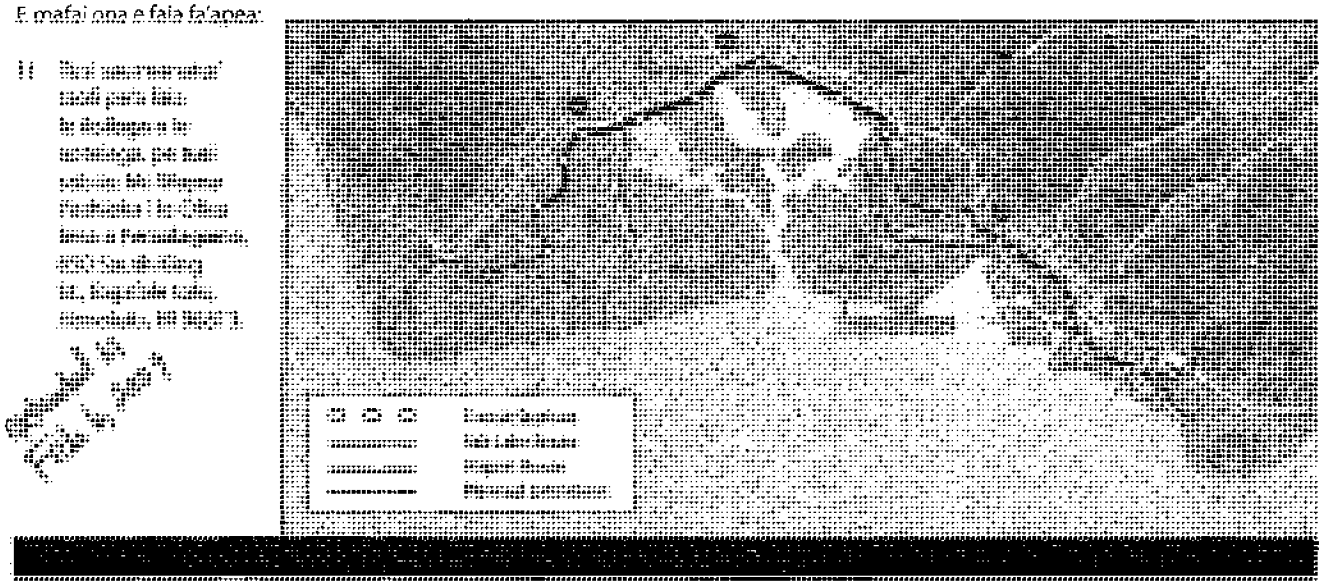
3) Va'ai le Internet lena i le website www.honolulutransit.org

E mafai ona ou vala'auina se tasi e fa'aliliu upu/ gagana i totonu o Fono o le aotelega o tagatanu'u?

Ioe. Vala'au le telefoni (808) 566-2299 i le ono aso a'o le'i o'o i le iloiloga. Ta'u i ai lou suafa, telefoni ma le gagana e mana'omia ai le fesoasoani.

Draft EIS Public Hearing Schedule

Date	Time	Area	Location
Saturday, Dec 6	9-11 am	Kapolei	Kapolei Hale 1000 Ulu'ohia St
Monday, Dec 8	6-8 pm	Ala Moana/ McCully	Blaisdell-Hawaii Suite 777 Ward Ave
Tuesday, Dec 9	6-8 pm	Salt Lake	Salt Lake District Park 1159 Ala Lilikoi Pl
Wednesday, Dec 10	6-8 pm	Waipahu	The Filipino Community C 94-428 Mokuola St
Thursday, Dec 11	6-8 pm	Kalihi	Bishop Museum 1525 Bernice St



DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, 3RD FLOOR
HONOLULU, HAWAII 96813
Phone: (808) 768-8305 • Fax: (808) 768-4730 • Internet: www.honolulu.gov

MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010 RT9/09-332979

Ms. Elizabeth Sataraka
Good Samaritan Church of Jesus Christ
99-545 Opukea Street
Aiea, Hawaii 96701

Dear Ms. Sataraka:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraph addresses your comments regarding the above-referenced submittal:

While each of the alternatives discussed in the Draft EIS includes trade-offs between benefits and impacts, the Airport Alternative from East Kapolei to Ala Moana has been selected as the Preferred Alternative as described above. As compared to the alternatives discussed in the Draft EIS, the Airport Alternative will carry the most passengers, provide the greatest transit-user benefits, and result in the fewest vehicle hours of delay. It will provide access to employment centers at Pearl Harbor Naval Base and Honolulu International Airport and will serve the Salt Lake neighborhood with connecting bus service. Of the three Build Alternatives addressed in the Draft EIS, the Airport Alternative will have slightly less impacts to the natural and built environment analyzed in the Draft EIS. During the public comment period on the Draft EIS, the public overwhelmingly supported the Airport Alternative. Of the comments that specifically supported one of the alternatives, more than 75 percent were in support of the Airport Alternative. For more information this selection is discussed in Section 2.4 of the Final

EIS. Since publication of the Draft EIS, design has been advanced, further analysis has been completed, and information has been added in response to comments on the Draft EIS and agency coordination. The Final EIS discusses the process that was used to select the Preferred Alternative, how comments were considered in the decision-making process, impacts and mitigation commitments.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Creation Date :	1/7/2009
Creator Affiliation :	
First Name :	Malo
Last Name :	Sua
Business/Organization :	Good Samaritan Church
Address :	P.O Box 31029
Alternative Preference :	
Apt./Suite No. :	
City :	Honolulu
State :	HI
Zip Code :	96820
Email :	
Telephone :	
Telephone Extension :	
Add to Mailing List :	Standard
Submission Method :	Website
Other Submission Method :	
Submission Date :	01/07/2009
Submission Content/Notes :	Thank you for thinking ahead to give the people a choice. Traffic is very bad from the Waianae Coast to Town.

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, 3RD FLOOR
HONOLULU, HAWAII 96813
Phone: (808) 768-8305 • Fax: (808) 768-4730 • Internet: www.honolulu.gov

MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT2/09-297988R

Mr. Malo A. Sua
P.O. Box 31029
Honolulu, Hawaii 96820-1029

Dear Mr. Sua:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraph addresses your comments regarding the above-referenced submittal:

Your preference for a Fixed Guideway Transit Alternative has been noted. While each of the alternatives discussed in the Draft EIS includes trade-offs between benefits and impacts, the Airport Alternative from East Kapolei to Ala Moana has been selected as the Preferred Alternative as described above. As compared to the alternatives discussed in the Draft EIS, the Airport Alternative will carry the most passengers, provide the greatest transit-user benefits, and result in the fewest vehicle hours of delay. It will provide access to employment centers at Pearl Harbor Naval Base and Honolulu International Airport and will serve the Salt Lake neighborhood with connecting bus service. Of the three Build Alternatives addressed in the Draft EIS, the Airport Alternative will have slightly less impacts to the natural and built environment analyzed in the Draft EIS. During the public comment period on the Draft EIS, the public overwhelmingly supported the Airport Alternative. Of the comments that specifically supported one of the alternatives, more than 75 percent were in support of the Airport Alternative. For more

information this selection is discussed in Section 2.4 of the Final EIS. Since publication of the Draft EIS, design has been advanced, further analysis has been completed, and information has been added in response to comments on the Draft EIS and agency coordination. The Final EIS discusses the process that was used to select the Preferred Alternative, how comments were considered in the decision-making process, impacts and mitigation commitments.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
Creation Date :	2/9/2009
Creator Affiliation :	
First Name :	Jamie
Last Name :	Story
Business/Organization :	Grassroot Institute of Hawaii
Address :	1314 South King Street
Alternative Preference :	
Apt./Suite No. :	Suite 1163
City :	Honolulu
State :	HI
Zip Code :	96814
Email :	jamie@grassrootinstitute.org
Telephone :	808-591-9193
Telephone Extension :	
Add to Mailing List :	None
Submission Method :	Letter
Other Submission Method :	DART #1/09-295335
Submission Date :	01/07/2009
Submission Content/Notes :	

295335

From: Jamie Story [mailto:jamiesue@clearwire.net]
Sent: Thursday, January 08, 2009 12:00 AM
To: Yoshioka, Wayne; ted.matley@fta.dot.gov
Cc: Governor.Lingle@hawaii.gov; Apo, Todd K; Dela Cruz, Donovan M; Marshall, Barbara; Djou, Charles; Bainum, Duke; Tam, Rod; Cachola, Romy; Okino, Gary; Garcia, Nestor
Subject: Grassroot Institute response to DEIS

Mr. Yoshioka and Mr. Matley,
Attached is the Grassroot Institute of Hawaii's response to the DEIS for the proposed Honolulu rail transit system. Please contact me if you have any follow-up questions. Thank you for your time!

Sincerely,

Jamie

Jamie Story, *President*
Grassroot Institute of Hawaii
jamie@grassrootinstitute.org
(808) 591-9193

The mission of the Grassroot Institute of Hawaii is to promote individual liberty, free market economic principles and limited, more accountable government. Please visit our website to make a tax-deductible donation or to learn more.

GRASSroot
Institute of Hawaii

January 7, 2009

Mr. Wayne Y. Yoshioka
Department of Transportation Services
City and County of Honolulu
650 South King Street, 3rd Floor
Honolulu, HI 96813

Mr. Ted Matley
FTA Region IX
201 Mission Street, Suite 1650
San Francisco, CA 94105

Mr. Yoshioka and Mr. Matley,

I am writing this letter out of concern regarding the proposed Honolulu rail transit system and the related Draft Environmental Impact Statement (DEIS).

Throughout 2008, the City and County of Honolulu made a number of claims, many of which are included in the DEIS, which cannot be substantiated by existing data. Our policy report, *Debunking Myths of Honolulu Rail Transit*, refutes many of these claims in detail. Below are just a few of these claims, along with brief explanations of the facts.

Claim: *Public transit ridership will increase with the addition of rail transit.*
Truth: Since 1960, Denver is the only city that has held onto a slight percentage increase in transit ridership after building rail. In metropolitan areas with high public transportation usage (Boston, Chicago, New York, and San Francisco), percentage of public transportation usage has decreased in all the cities following the implementation of rail systems. The same pattern is occurring for metropolitan areas with second tier public transportation usage (Detroit, Houston, Los Angeles, Phoenix, Portland, Sacramento, San Juan, San Diego), contrary to what the city's radio and TV ads would have one believe. (Decennial Census 1960-2000 and American Community Survey for 2007. US Census Bureau. http://factfinder.census.gov/servlet/DatasetMainPageServlet?_lang=en&_ts=240267317805&_ds_name=ACS_2006_EST_G00_&_program)

Claim: *Rail systems in cities such as Vancouver, Salt Lake City, Portland, and Washington, DC have been vital in reducing traffic.*
Truth: According to the Texas Transportation Institute's 2007 Urban Mobility Report, none of these cities have experienced a reduction in traffic, and traveling times for

commuters have increased even in spite of rail.
(http://mobility.tamu.edu/ums/congestion_data/tables/national/table_4.pdf)

Claim: *Rail uses less energy than automobiles or other commute options.*
Truth: According to the US Department of Energy, energy use per passenger mile (Btu) is 3,512 for cars, 4,235 for buses, and 2,784 for rail. Motorcycles clock in much lower at 1,855, while the Toyota Prius clocks in at only 1,659 (Transportation Data Book, Chapter 2, Table 2.12 Passenger Travel and Energy Use. 2006. US Department of Energy. www-cta.ornl.gov/data/chapter2.shtml; Greenhouse Gas Emissions per Passenger Mile, Public Transport & Personal Mobility in USA in 2005. www.demographia.com/db-ghg-carstr.pdf). Given rail transit's declining ridership and permanent dependence on fuel, the increasing popularity of fuel-efficient cars such as the Prius and newer models mean that energy efficiency is increasing for cars while it decreases for rail. Furthermore, the energy necessary to build a rail system offsets any estimated energy savings. Portland's environmental impact statements estimates the system would need 172 years of savings—moving commuters from cars to rail—in order to make up for construction.

Claim: *Rail reduces carbon emissions.*
Truth: The CO2 output of the light and heavy rail, buses and the average car are presently very nearly the same. With the advent of hybrid and other more efficient cars and the high turnover of cars, the average car will soon surpass all other commute options, including heavy rail. This argues for transit systems that allow for large numbers of increasingly energy efficient cars—not fixed rail systems that will soon become a thing of the past.

Claim: *A $6.5 billion train is cost-effective.*
Truth: According to the DEIS, the proposed rail system with both Airport and Salt Lake routes will cost $6.5 billion in capital costs alone, or more than $6,000 per Oahu resident. These numbers are excessively large, especially when more cost-effective traffic solutions exist. For example, the construction of HOT Lanes would cost just $0.9 billion, while shaving 40 minutes off of the commute time from Kapolei to Downtown as compared to rail. ("Transportation Alternatives Analysis for Mitigating Traffic Congestions between Leeward Oahu and Honolulu" directed by Professor Panos D. Prevedouros, of the University of Hawaii at Manoa.)

Thank you so much for taking the time to understand these concerns as expressed by the Grassroot Institute of Hawaii. Please don't hesitate to contact me if you need any further information.

Sincerely,

Jamie Story
President
Grassroot Institute of Hawaii
1314 S. King St. Suite 1163
Honolulu, Hawaii 96814
(808) 591-9193
www.grassrootinstitute.org

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

KENNETH TORU HAMAYASU
DEPUTY DIRECTOR

June 11, 2010

RT1/09-295335R

Ms. Jamie Story
Grassroot Institute of Hawaii
1314 South King Street, Suite 1163
Honolulu, Hawaii 96814

Dear Ms. Story:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address comments regarding the above-referenced submittal:

Public transit ridership

Table 3-18 of the Final EIS details the total 2030 weekday transit boardings for the Project at over 450,000 (bus and rail). This will be an increase of 80 percent over the 2007 reported weekday transit boardings for the 23-year period. This is a reasonable expectation given the substantially higher level of service to be provided with the Project. It is also on track with other locations that have implemented rail in critical travel corridors. Portland, OR, for example, experienced an increase in transit ridership of over 90 percent between 1987 and 2007 after the rail line was built. Overall transit boardings have increased 33 percent between 1999 and 2009 (TriMet Service and Ridership Information). Valley Metro ridership in Phoenix

increased 15 percent in one year following the opening of the rail line (Valley Metro press release, July 2009)

In addition, national trends show increasing transit ridership. 2008 recorded the highest demand for public transportation in 52 years (APTA 2008 Ridership Report). It is anticipated this demand for public transportation will increase in Honolulu. It is misleading to use "metro area" public transportation usage data over a time span of many decades since "metro area" has been redefined and enlarged in each census period to include low-density outer areas not served by rail, or even bus transit in some cases.

As noted above, in the 20-year period between 1987 and 2007, ridership grew 95.5 percent for the Tri-Met system in Portland, Oregon, as measured by annual unlinked passenger trips. In that same 20-year period, the transit system in Phoenix experienced 189.4 percent growth in passenger trips; Sacramento experienced 131.9 percent growth and San Diego's growth was 119.6 percent in unlinked passenger trips. Other systems, including those serving Houston, Los Angeles, Boston, New York, and San Francisco, have all experienced varying rates of growth as measured by unlinked passenger trips (APTA 2008 Ridership Report).

Traffic

In analyzing future traffic congestion and the impact of the Project, the key is to understand how bad traffic would be without rail. If all the people using the rail lines in those cities drove, conditions would be dramatically worse. A travel forecasting model was used to determine transit ridership and roadway conditions in 2030 with and without the Project. This model is used by the Oahu Metropolitan Transportation Organization (OahuMPO) for the Oahu Regional Transportation Plan 2030. The model is updated approximately every five years to reflect changes in land use, socio-economic conditions, and transportation network improvements. The model is approved by the OahuMPO Technical Advisory Committee. The OahuMPO model is based on "best practices" for urban travel models in the U.S. The model is consistent with consultation with FTA and required to meet FTA standards to qualify the Project for federal funding under the New Starts program. As stated in Table 3-14 of Chapter 3 of the Final EIS, the travel forecasting model predicts that Honolulu traffic in 2030 will be 18 percent better (in terms of delay) with the Project, compared to the No Build Alternative. Rail also provides a reliable, consistent alternative to the uncertainty of highway congestion.

Energy

Your comment correctly identifies the energy consumption use for the various modes of transportation, with rail being the most efficient of the major modes listed, as calculated for data collected for the year 2006. The same report referenced shows that between 1970 and 2006, highway transportation energy consumption has been growing at a rate of 1.8 percent per year. The assertion that highway transportation energy consumption will stop growing on an annual basis is not supported by data collected over the past 36 years.

Carbon emissions

Future analysis can only consider what is currently regulated. This includes future vehicle mix and available technologies. The analysis does not assume that future technologies will only affect private automobiles and not affect mass transit vehicles.

In addition, the direct comparison of carbon dioxide emissions between automobiles and transit rail cannot be made without knowing the energy sources providing the electricity. The utility (HECO) that will provide electricity for the Project primarily uses fuel oil to generate electricity, but the HECO grid is supplemented with independent power producers that generate electricity through renewable resources. As the percentage of energy produced from renewable resources increases over time, the electrically powered rail system will allow less of the island's transportation system to rely on oil. As noted in Section 4.9.3 of the Final EIS, the Project will result in a daily reduction of 171 metric tons of carbon dioxide when compared to the No Build Alternative. For an at-capacity system, approximately 25 grams of carbon dioxide are emitted per passenger mile. Approximately 150 grams of carbon dioxide are produced per 1/50th of a gallon of gasoline consumed.

As noted in Section 4.11.1 of the Final EIS, an average rail vehicle consumes 62,700 BTUs per vehicle mile of service. A single vehicle has a capacity of approximately 160 passengers. Therefore, approximately 390 BTUs are consumed per passenger mile at capacity. Consumption of 1/50th of a gallon of gasoline consumes 2,500 BTUs.

Cost-effectiveness

The cost of the Project is $5.5 billion in year of expenditure dollars. The cost-effectiveness index (CEI) calculation defined by FTA under the New Starts program requires that a project show that the CEI is less than a $24.99 per new rider threshold to qualify for federal funding. The Project CEI is $16.24 per rider, well below the threshold. Comments about the costs and effectiveness of HOT lanes are not consistent with the findings in the Alternatives Analysis. The Alternatives Analysis showed that the cost of the Managed Lane facility would have been at least $2.6 billion in 2006 dollars and the benefits in terms of reducing congestion would have been only slightly better than the No Build Alternative and substantially worse than the Fixed Guideway alternative.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
Creation Date :	11/20/2008
Creator Affiliation :	
First Name :	krista
Last Name :	groothuis
Business/Organization :	
Address :	91-1052 aeae st.
Apt./Suite No. :	
City :	ewa beach
State :	HI
Zip Code :	96706
Email :	krista.groothuis@gmail.com
Telephone :	
Telephone Extension :	
Add to Mailing List :	None
Submission Method :	Website
Other Submission Method :	
Submission Date :	11/20/2008
Submission Content/Notes :	It is important to route the rail through the airport up to University of Hawaii. As Tourism is one of the largest industries in Hawaii, the rail will reduce traffic and provide transportation for both visitors and residents/employees (of the airport). Also important is to route to UH. As a resident from the Leeward side of the island, I can confirm that traffic is alleviated when school is out of session. Therefore, I SUPPORT THE ROUTE TO THE AIRPORT. I don't believe there's enough demand to travel through Salt Lake.

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-330562

Ms. Krista Groothuis
91-1052 Aeae Street
Ewa Beach, Hawaii 96706

Dear Ms. Groothuis:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

While each of the alternatives discussed in the Draft EIS includes trade-offs between benefits and impacts, the Airport Alternative from East Kapolei to Ala Moana has been selected as the Preferred Alternative as described above. As compared to the alternatives discussed in the Draft EIS, the Airport Alternative will carry the most passengers, provide the greatest transit-user benefits, and result in the fewest vehicle hours of delay. It will provide access to employment centers at Pearl Harbor Naval Base and Honolulu International Airport and will serve the Salt Lake neighborhood with connecting bus service. Of the three Build Alternatives addressed in the Draft EIS, the Airport Alternative will have slightly less impacts to the natural and built environment analyzed in the Draft EIS. During the public comment period on the Draft EIS, the public overwhelmingly supported the Airport Alternative. Of the comments that specifically supported one of the alternatives, more than 75 percent were in support of the Airport Alternative. For more information this selection is discussed in Section 2.4 of the Final

EIS. Since publication of the Draft EIS, design has been advanced, further analysis has been completed, and information has been added in response to comments on the Draft EIS and agency coordination. The Final EIS discusses the process that was used to select the Preferred Alternative, how comments were considered in the decision-making process, impacts and mitigation commitments.

The Project has logical termini at East Kapolei and Ala Moana Center and independent utility from any extensions that may be constructed in the future. The proposed future extensions to West Kapolei, Salt Lake Boulevard, Waikiki, and UH Manoa are discussed in the cumulative impacts sections of Chapters 3 and 4 of this Final EIS. The future extensions are not part of this Project, thus they are not required to be evaluated under Chapter 343 of the Hawaii Revised Statutes and NEPA. Under NEPA, environmental analysis is only required when there is a proposed action by a Federal agency. Here, because the future extensions are not proposed for implementation at this time, they are not part of the Project studied in this Final EIS. It would be premature to undertake an environmental analysis of the extensions (beyond the cumulative impacts analysis) because they are not part of the proposed action to be taken by the City and FTA. If the future extensions are proposed for implementation in the future, environmental analysis of the extensions and appropriate alternatives will be undertaken at that time. Bus service between Ala Moana Center and UH Manoa and Waikiki will be enhanced until those extensions are built.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
Creation Date :	12/4/2008
Creator Affiliation :	
First Name :	Gene
Last Name :	Grounds
Business/Organization :	
Address :	245 Mahimahi Place
Alternative Preference :	
Apt./Suite No. :	
City :	Honolulu
State :	HI
Zip Code :	96821
Email :	groundsg001@hawaii.rr.com
Telephone :	808-377-5101
Telephone Extension :	
Add to Mailing List :	Both
Submission Method :	Website
Other Submission Method :	
Submission Date :	12/04/2008
Submission Content/Notes :	I fully support and accept this EIS. I prefer the airport route over the Salt Lake route.

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-331289

Mr. Gene Grounds
245 Mahimahi Place
Honolulu, Hawaii 96821

Dear Mr. Grounds:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall indentify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraph addresses your comments regarding the above-referenced submittal.

While each of the alternatives discussed in the Draft EIS includes trade-offs between benefits and impacts, the Airport Alternative from East Kapolei to Ala Moana has been selected as the Preferred Alternative as described above. As compared to the alternatives discussed in the Draft EIS, the Airport Alternative will carry the most passengers, provide the greatest transit-user benefits, and result in the fewest vehicle hours of delay. It will provide access to employment centers at Pearl Harbor Naval Base and Honolulu International Airport and will serve the Salt Lake neighborhood with connecting bus service. Of the three Build Alternatives addressed in the Draft EIS, the Airport Alternative will have slightly less impacts to the natural and built environment analyzed in the Draft EIS. During the public comment period on the Draft EIS, the public overwhelmingly supported the Airport Alternative. Of the comments that specifically supported one of the alternatives, more than 75 percent were in support of the

Airport Alternative. For more information this selection is discussed in Section 2.4 of the Final EIS. Since publication of the Draft EIS, design has been advanced, further analysis has been completed, and information has been added in response to comments on the Draft EIS and agency coordination. The Final EIS discusses the process that was used to select the Preferred Alternative, how comments were considered in the decision-making process, impacts and mitigation commitments.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
Creation Date :	12/27/2008
Creator Affiliation :	
First Name :	James
Last Name :	Ha
Business/Organization :	
Address :	1201 Liliha Street
Alternative Preference :	
Apt./Suite No. :	202
City :	Honolulu
State :	HI
Zip Code :	96817
Email :	hajames12@yahoo.com
Telephone :	
Telephone Extension :	
Add to Mailing List :	Both
Submission Method :	Website
Other Submission Method :	
Submission Date :	12/27/2008
Submission Content/Notes :	I live on Liliha Street, please make a stop near Liliha Street, thank you.

DEPARTMENT OF TRANSPORTATION SERVICES

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-332263

Mr. James Ha
1201 Liliha Street
Apartment 202
Honolulu, Hawaii 96817

Dear Mr. Ha:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraph addresses your comments regarding the above-referenced submittal:

Your request for a station near Liliha Street has been noted. As illustrated in Figure 2-32 of Chapter 2 of the Final EIS, the Iwilei Station is located at Kaaahi Street and Dillingham Boulevard, one block from Liliha Street.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
Creation Date :	2/3/2009
Creator Affiliation :	
First Name :	James
Last Name :	Ha
Business/Organization :	
Address :	1201 Liliha Street
Alternative Preference :	
Apt./Suite No. :	202
City :	Honolulu
State :	HI
Zip Code :	96817
Email :	jamesha@hawaii.edu
Telephone :	
Telephone Extension :	
Add to Mailing List :	Standard
Submission Method :	Website
Other Submission Method :	
Submission Date :	02/03/2009
Submission Content/Notes :	Hello, Please add an station on Liliha Street.

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

February 16, 2010

RT9/09-334420

Mr. James Ha
1201 Liliha Street, #202
Honolulu, Hawaii 96817

Dear Mr. Ha:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 C.F.R. § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address comments regarding the above-referenced submittal:

Your comment has been noted. As illustrated in Chapter 2 of the Final EIS, the Iwilei Station is located at Kaaahi Street and Dillingham Boulevard, one block from Liliha Street.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Issuance of the Record of Decision under NEPA and acceptance of the Final EIS by the Governor of the State of Hawaii are the next anticipated actions and will conclude the environmental review process for this Project.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
Creation Date :	12/24/2008
Creator Affiliation :	
First Name :	JOHN
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City :	KAILUA
State :	HI
Zip Code :	96734
Email :	JHACKNEY@CARLSONSATOTRAVEL.COM
Telephone :	808-261-9828
Telephone Extension :	
Add to Mailing List :	Email
Submission Method :	Website
Other Submission Method :	
Submission Date :	12/24/2008
Submission Content/Notes :	THIS WHOLE RAIL THING IS A HUGE BOONDOOGLE. IT WILL DO NOTHING TO EASE TRAFFIC. PLUS, THE WORST PART OF THE WHOLE THING IS THAT THE PROJECT IS UNAFFORDABLE. THE PEOPLE THAT MIGHT RIDE THE PROJECT ARE NOT THE ONES WHO WILL END OF PAYING FOR IT. BOTH YOU AND I KNOW THAT PROPERTY TAX PAYERS WILL END UP SHOULDERING A HUGE PERCENTAGE OF THE TOTAL COST.

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010 RT10/09-338268

Mr. John Hackney
JHACKNEY@CARLSONSATOTRAVEL.COM

Dear Mr. Hackney:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraph addresses your comments regarding the above-referenced submittal:

First, your opposition to the Project is noted.

With the Project, transportation benefits are expected to occur that will affect traffic conditions on Oahu. A Travel Demand Forecasting Model, based on guidelines established by the Federal Transit Administration, was used to determine traffic volumes in 2030 with and without the Project. With the fixed guideway system, total islandwide congestion (as measured by vehicle hours of delay) would decrease by 18 percent, compared to the No Build Alternative (Table 3-14 of the Final EIS). In addition, traffic volumes were studied at various screenlines in the study corridor, as shown in Tables 3-9 and 3-10 in the Final EIS. Analysis revealed that traffic volumes at these screenlines would decrease with the Project.

Section 6.3 of the Final EIS describes the funding sources anticipated to be used to pay for the capital cost of the Project and the City's overall public transportation system. Capital

costs of the Project, including finance charges, are expected to be fully paid for by a combination of FTA Section 5307 and FTA Section 5309 New Starts Funds from the Federal government and the revenues from the General Excise and Use Tax Surcharge revenues levied from 2007 through 2022. Section 6.4 of the Final EIS describes the funding sources to pay for ongoing operations and maintenance costs associated with maintaining the resulting transit system in state of good repair. Operating and maintenance costs will be paid for from the same sources currently used for TheBus: Federal funding, fare revenues, and subsidies from the City's General and Highway Funds.

The FTA and DTS appreciate your interest in the Project. The Final EIS has been issued in conjunction with the distribution of this letter. You may view the Final EIS on the Project website at www.honolulutransit.org. You may request a DVD of the Final EIS and additional content through the "Contact Us" tab on the website or by calling the Project hotline at 566-2299. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Status :	Initial Action Needed
Creation Date :	11/24/2008
Creator Affiliation :	
First Name :	Cary
Last Name :	Haitsuka
Business/Organization :	
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Alternative Preference :	Airport
Apt./Suite No. :	
City :	Mililani
State :	HI
Zip Code :	96789
Email :	haitsukac002@hawaii.rr.com
Telephone :	
Telephone Extension :	
Add to Mailing List :	Email
Submission Method :	Website
Other Submission Method :	
Submission Date :	11/24/2008
Submission Content/Notes :	I like to say I would prefer the rail go through the airport and to Waikiki and UH Manoa in the future. Thanks for letting us input our comments for the rail system. Cary

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, 3RD FLOOR
HONOLULU, HAWAII 96813
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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010 RT9/09-330796

Mr. Cary Haitsuka
95-1174 Anuanu Street
Mililani, Hawaii 96789

Dear Mr. Haitsuka:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

While each of the alternatives discussed in the Draft EIS includes trade-offs between benefits and impacts, the Airport Alternative from East Kapolei to Ala Moana has been selected as the Preferred Alternative as described above. As compared to the alternatives discussed in the Draft EIS, the Airport Alternative will carry the most passengers, provide the greatest transit-user benefits, and result in the fewest vehicle hours of delay. It will provide access to employment centers at Pearl Harbor Naval Base and Honolulu International Airport and will serve the Salt Lake neighborhood with connecting bus service. Of the three Build Alternatives addressed in the Draft EIS, the Airport Alternative will have slightly less impacts to the natural and built environment analyzed in the Draft EIS. During the public comment period on the Draft EIS, the public overwhelmingly supported the Airport Alternative. Of the comments that specifically supported one of the alternatives, more than 75 percent were in support of the Airport Alternative. For more information this selection is discussed in Section 2.4 of the Final

EIS. Since publication of the Draft EIS, design has been advanced, further analysis has been completed, and information has been added in response to comments on the Draft EIS and agency coordination. The Final EIS discusses the process that was used to select the Preferred Alternative, how comments were considered in the decision-making process, impacts and mitigation commitments.

UH Manoa and Waikiki will be served by enhanced bus service. Future bus routes, including frequencies, are shown in Appendix D of the Final EIS. The Project has logical termini at East Kapolei and Ala Moana Center and independent utility from any extensions that may be constructed in the future. The proposed future extensions to West Kapolei, Salt Lake Boulevard, Waikiki, and UH Manoa are discussed in the cumulative impacts sections of Chapters 3 and 4 of this Final EIS. Other extensions, such as Central Oahu, have been considered and may be undertaken at some point after the current Project. The future extensions are not part of this Project, thus they are not required to be evaluated under Chapter 343 of the Hawai'i Revised Statutes and NEPA. Under NEPA, environmental analysis is only required when there is a proposed action by a Federal agency. Here, because the future extensions are not proposed for implementation at this time, they are not part of the Project studied in this Final EIS. It would be premature to undertake an environmental analysis of the extensions (beyond the cumulative impacts analysis) because they are not part of the proposed action to be taken by the City and FTA. If the future extensions are proposed for implementation in the future, environmental analysis of the extensions and appropriate alternatives will be undertaken at that time.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

-----Original Message-----
From: Ted.Matley@dot.gov [mailto:Ted.Matley@dot.gov]
Sent: Thursday, January 22, 2009 1:40 PM
To: Miyamoto, Faith
Subject: FW: Rail

-----Original Message-----
From: Sally Hall [mailto:HALLS011@HAWAII.RR.COM]
Sent: Tuesday, December 23, 2008 7:54 PM
To: wyoshioka@honolulu.gov
Cc: Matley, Ted <FTA>; governor.lingle@hawaii.gov
Subject: Rail

Government by the People, for the People?

"Our government should work for us, not against us, help us, not hurt us." These words spoken by Barack Obama at the Democratic National Convention ring with truth. Unfortunately, though, in Honolulu they no not reflect the reality of city government. Our city officials, under the leadership of Mayor Mufi Hannemann, are refusing to stop a train that will carry us head on into economic and environmental disaster.

Trade unions and businesses which stand to benefit from the steel on steel rail support it, as do many city bureaucrats dependent on Mufi for their jobs. But there are 35,000 or 45,000 or 49,000 voters, depending on how one defines voter, who want alternatives. Their concerns should not be dismissed. Only after a protracted struggle by citizen groups did the city agree to a City and County of Honolulu question on the November 4th ballot asking, "Should the city build a steel wheel on steel rail transit system?" Nearly half of the citizens of Hawaii fully understood the dire consequences of such a system, and voted "No!"

The proposed steel on steel rail will be an elevated 20 to 40 foot high cement structure climbing to 70 feet at U.H. Manoa and 125 feet at Ala Moana Center, stretching from Kapolei to Ala Moana and U.H. Manoa with spurs to the airport and along the Ala Wai. On Nimitz Avenue between Ka'ai Street, Bishop Street, and Halekauwila, the 20 foot elevation will run along the water. Stations will be strategically placed at 32 sites, one 5 stories high across from Aloha Tower and one 12 stories tall at Ala Moana Center. No one along this route will be able to escape the racket of steel on steel trains roaring by. No one will be able to escape the blight on the aina.

The costs to the taxpayer are staggering. Some states have no sales tax; others have no property tax; some have no tax on food or medications; still other states have no income tax. But in Hawaii we have them all, except in place of a sales tax we have a more insidious tax, a 4% excise tax, a tax on business transactions at every level which is passed on to the consumer. Hannemann added a "county

AR00001882

surcharge" of .5% to the excise tax to help finance the rail, giving us a rate of 4.5%. If businesses choose to pass on their excise tax liability to the consumer, this tax can be as high as 4.712%.

Add this to our high cost of living, and the financial burden becomes untenable. The cost of the steel on steel rail, with inflation and cost overruns, is now projected to be about 7 billion dollars. With the burden of maintaining a corrosion prone steel on steel system, an impractical choice for an island surrounded by ocean, the costs go even higher. We will pay, our children will pay, and our grandchildren will pay for a system that with rapidly advancing technology will become obsolete as fast as it is built.

By not presenting alternatives to steel on steel rail technology, the mayor leads many voters to think the choice is rail or nothing. Yet there are alternatives to steel on steel rail, well integrated and carefully thought out systems that would ease the traffic nightmare at a fraction of the cost and environmental destruction. The coordination of ferries, high occupancy toll lanes, fleets of mini buses, traffic lights, contra flow lanes, bicycle routes, and the use of new underpasses while encouraging telecommunication and staggered work hours would be less invasive, less costly, and more flexible than a steel on steel rail system. There may even be another less invasive, less costly, and more flexible rapid transit system that would work for Oahu commuters.

Honolulu needs a mayor who works for all the people, not just those who contribute to his campaign or who will profit from the steel on steel rail system. An honest reappraisal of the rail issue would help citizens feel their government is working for them. An honest and effective mayor would look at the current economic recession and have the integrity to scrap a rail system that will bankrupt the future, become obsolete before it is finished, and wreak havoc on Oahu's fragile ecosystem.

AR00001883

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
MAYOR

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DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT12/08-292998R

Ms. Sally Hall
halls011@hawaii.rr.com

Dear Ms. Hall:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

Your comments have been noted. As discussed in Chapter 2 of the Final EIS, the fixed guideway system will travel from East Kapolei to Ala Moana Center via the Airport. The Project has logical termini at East Kapolei and Ala Moana Center and independent utility from any extensions that may be constructed in the future. The planned extensions are included in the Oahu Regional Transportation Plan as illustrative projects and are anticipated to be completed at some time prior to 2030. The future extensions to West Kapolei, Salt Lake Boulevard, Waikiki, and UH Manoa are discussed in the cumulative impacts sections of Chapters 3 and 4 of the Final EIS. However, the future extensions are not part of this Project; thus, they are not required to be evaluated under Chapter 343 of the Hawaii Revised Statutes and NEPA. Under NEPA, environmental analysis is only required when there is a proposed action by a Federal agency. Here, because the future extensions are not proposed for implementation at this time, they are not part of the Project studied in the Final EIS. It would be premature to undertake an environmental analysis of the extensions (beyond the cumulative impacts analysis) because

they are not part of the proposed action to be taken by the City and FTA. If the extensions are proposed for implementation in the future, environmental analysis of the extensions and appropriate alternatives will be undertaken at that time.

As stated in Section 4.10.3 of the Final EIS, the Project will cause no severe noise impacts. Moderate impacts will occur at upper floors of a few high-rise buildings (as shown in Table 4-18 in the Final EIS). With the recommended mitigation in place (parapet wall, sound absorbing material and wheel skirts), the noise analysis indicates that the new noise generated by the Project will be lower than the existing noise levels in most places.

The project design includes an integrated noise-blocking parapet wall at the edge of the guideway structure that extends 3 feet above the top of the rail. The parapet wall will substantially reduce ground-level noise.

The use of sound-absorptive materials below the tracks in the areas that will experience moderate noise impacts will reduce the Project noise levels from the upper floors to below the impact level. Wheel skirts will increase the benefit from the parapet wall at locations above the elevation of the track. Once the Project is operating, noise levels will be re-measured to confirm that there are no noise impacts from the Project.

The assessment of visual effect due to the Project as described in Section 4.8.3 of the Final EIS considers changes to the visual landscape and viewer responses to those changes. This includes the existing development along the Project alignment. Within the Project corridor the environment changes from rural at the Wai'anae end of the corridor to dense high-rise development at the Koko Head end.

As part of the design process, the City has developed design principles, which are identified in the Honolulu High-Capacity Transit Corridor Project Compendium of Design Criteria (RTD 2009m) that will be implemented in final design to minimize visual effects of the Project. For example, guideway materials and surface textures will be selected in accordance with generally accepted architectural principles to achieve effective integration between the guideway and its surrounding environment. Landscape and streetscape improvements will mitigate potential visual impacts, primarily for street-level views.

Other measures to address visual impacts of the Project are being developed through the station design and planning process. The initial station area plans and design guidelines were first developed with coordination between DTS and the Department of Planning and Permitting (DPP). The next level of transit station design focuses on integrating individual neighborhood characteristics of the communities served by the stations.

The following mitigation framework will be included in the Project to minimize negative visual effects and enhance the visual and aesthetic opportunities that it creates:

- *Develop and apply design guidelines that will establish a consistent design framework for the Project with consideration of local context.*
- *Coordinate the project design with City TOD planning and DPP.*
- *Consult with the communities surrounding each station for input on station design elements.*

- *Consider specific sites for landscaping and trees during the final design phase when plans for new plantings will be prepared by a landscape architect. Landscape and streetscape improvements will serve to mitigate potential visual impacts.*

Section 4.8.3 of the Final EIS, Design Principles and Mitigation includes information related to the mitigation framework described above. Specifically architecture and landscape design criteria include guidelines regarding site design, materials and finishes, and lighting, which apply to stations, station areas, and the guideway.

Chapter 6 of the Final EIS describes the financial resources anticipated to be needed to pay for the capital cost of the Project and for ongoing operating and maintenance costs. Capital costs, including finance charges, are expected to be fully paid for by a combination of FTA Section 5307 and FTA Section 5309 New Starts funds from the Federal government and the County General Excise and Use Tax (GET) surcharge levied from 2007 through 2022 on Oahu. Operating and maintenance costs include costs associated with maintaining the transit system in a state of good repair and will be paid for from the same sources currently used for TheBus: Federal funding, fare revenues, and subsidies from the City's General and Highway Funds.

The Mayor did not add a "county surcharge." The decision to add the GET surcharge of 0.5 percent was made by the City Council after authorization by the State legislature. The cost of the Project, with inflation, is forecast to be $5.5 billion, including finance charges. The steel used in rail systems is not prone to corrosion. With minimal maintenance, steel rails can last for decades.

Lastly, to address your comments regarding the alternatives evaluated for the Project, the Alternatives Analysis fairly addressed the types of alternatives presented in the comment. They did not perform at the level of the fixed guideway and were eliminated from further consideration, as noted in Chapter 2 of the Final EIS. As stated in Section 2.2.3 of this Final EIS, the NEPA Notice of Intent requested input on five transit technologies. A technical review process included the opportunity for public comment and was used in parallel with the alternatives analysis to select a transit technology. The process included a broad request for information that was publicized to the transit industry. Transit vehicle manufacturers submitted 12 responses covering all of the technologies listed in the Notice of Intent. An independent five-member technology panel composed of four transit experts and a transportation academic appointed by the City Council evaluated guided rubber-tire-on-concrete systems (e.g., Phileas bus system and VAL-type systems), monorail (which is a variation on rubber-tired technology), steel-wheel-on-steel-rail systems, (e.g., light rail and rapid rail), and magnetic levitation (MAGLEV) . The panel considered the performance, cost, and reliability of the proposed technologies.

Proprietary technologies, meaning those technologies that would have required all future purchases of vehicles or equipment to be from a single manufacturer, were eliminated because none of the proprietary technologies offered substantial proven performance, cost, and reliability benefits compared to steel wheel operating on steel rail.

The panel accepted public comment twice as part of its review. By a four-to-one vote, the panel chose a steel wheel vehicle operating on steel rail system because it was considered safe, reliable, economical, and non-proprietary. Those results are documented in the panel's

report to the City Council dated February 22, 2008 entitled "Independent Technology Selection Panel Report".

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

From: Ted.Matley@dot.gov [mailto:Ted.Matley@dot.gov]
Sent: Thursday, January 22, 2009 1:39 PM
To: Miyamoto, Faith
Subject: FW: Honolulu Rail System

From: Gerhard C. Hamm [mailto:gch.hawaii@hawaiiantel.net]
Sent: Wednesday, January 07, 2009 2:36 PM
To: Matley, Ted <FTA>
Subject: Honolulu Rail System

January 6, 2009

Dear Mr. Matley,

Phoenix just opened a new 20 mile light-rail train built for $1.4 billion.

Why does our Honolulu government project $5.3 billion for our 20 mile system? Are the Phoenicians that much smarter than us to elect a government that provides them with the same length system for almost $4 billion (Four Billion Dollars) less? Wow!

What could we taxpayers do with $4 billion in our own pockets? Think about it, seriously. Perhaps for the billion-dollar EPA-required sewage upgrade, and still have a few billions left?

Sincerely,
Gerhard C. Hamm
1930 Alaweo St.
Honolulu HI 96821-1304
(808) 373-1930
GCH.Hawaii@Hawaiiantel.net

1/23/2009

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

February 16, 2010

RT9/09-334331

Mr. Gerhard C. Hamm
1930 Alaweo Street
Honolulu, Hawaii 96821-1304

Dear Mr. Hamm:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 C.F.R. § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address comments regarding the above-referenced submittal:

The conditions between Phoenix and Honolulu are different. The systems are both 20 miles long, but the Phoenix line is estimated to carry less than half the riders of the Honolulu system and take more than twice as long to travel the 20 miles. Moreover, the Phoenix line removes two lanes of traffic along most of the route. There are numerous alternative routes available for motorists in the Phoenix metro area. The Honolulu Project will not remove any travel lanes. It will add to the capacity of the overall transportation system without reducing the existing, limited roadway supply. Phoenix did not need to preserve highway capacity; Honolulu must. To accomplish that, the system must be elevated (underground is more expensive). The cost of an elevated system is higher than an at-grade line such as the recently opened system in Phoenix, but the Honolulu service will have a much higher capacity and will be more reliable.

Lastly, the proposed capital funding sources for the Project cannot be used for non-public transportation projects such as a secondary wastewater treatment plant. Enabling legislation for the County General Excise and Use Tax surcharge and Ordinance 07-001 preclude the use of the collected funds for purposes other than a fixed-guideway transit system.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Issuance of the Record of Decision under NEPA and acceptance of the Final EIS by the Governor of the State of Hawaii are the next anticipated actions and will conclude the environmental review process for this Project.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
Creation Date :	11/20/2008
Creator Affiliation :	
First Name :	cameron
Last Name :	hamp
Business/Organization :	
Address :	
Apt./Suite No. :	
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State :	HI
Zip Code :	96789
Email :	cameron41085@yahoo.com
Telephone :	
Telephone Extension :	
Add to Mailing List :	Email
Submission Method :	Website
Other Submission Method :	
Submission Date :	11/20/2008
Submission Content/Notes :	I have a few questions the first being, What kind of security will be provided at the parking lots at the rail stops? If current "road work" creates congestion now, how much more would a full scale project affect traffic? And what hours would the labor be done? I have seen State "projects" and generally they take 2-3 more years than originally planned and fail to meet the budget consistently. Are there any guarantees that this project timeline would be met? All of this is built on the assumption that the train would be full? Again are there any guarantees, or incentives to use the train, otherwise I say this, oh someone else is going to take it I can drive. The idea that other people will say will someone else will do it similar to the philosophy of recycling...if i dont do it someone else will.

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010 RT9/09-330572

Mr. Cameron Hamp
cameron41085@yahoo.com

Dear Mr. Hamp:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

Regarding your question about how security will be provided at parking lots and stations, DTS, with assistance from the Honolulu Police Department, is developing a security plan for transit facilities, including park-and-ride lots. As discussed in the Final EIS Section 2.5.4 Safety and Security Measures, a project-specific Safety and Security Management Plan has been developed in accordance with FTA requirements to define the safety and security activities and methods for identifying, evaluating, and resolving potential safety hazards and security vulnerabilities of the system. It establishes responsibility and accountability for safety and security during the Preliminary Engineering, Final Design, construction, testing, and start-up phases of the Project. The Honolulu Police Department, the Honolulu Fire Department, the Honolulu Department of Emergency Management, and the Honolulu Emergency Services Department have been involved in preparing and will be part of implementing the plan. The plan addresses public safety and security concerns, including threats and hazards associated with

the Project, specific issues that were identified through community outreach efforts, and design and architectural details to enhance safety.

In response to your comments regarding construction effects on traffic, as discussed in Section 3.5 of the Final EIS, there will be some construction-related effects on traffic, such as lane closures, which may occur throughout the day, including peak travel periods. The extent and duration of lane closures will vary depending on location. A Maintenance of Traffic (MOT) Plan will be developed prior to construction and will describe construction methods, times, and resulting road closures. A Transit Mitigation Program will mitigate effects on transit service operating during project construction. As stated in Section 3.5.7 of the Final EIS, an extensive public information program will be implemented to provide motorists with a thorough understanding of the location and duration of construction activities, as well as anticipated traffic conditions.

Regarding your comments on the timeframe of construction activities, the anticipated project schedule is shown in Figure 2-42 of the Final EIS. The best incentive for a contractor to stay on schedule is that completing a project ahead of time generally results in a higher profit. Because of the tight timeline for completion, however, the City will impose penalties for late completion as part of the Project construction contracts. Construction of the Project will take approximately nine years to complete.

Regarding your comment on ridership, the primary quantitative method for evaluating the alternatives is a travel demand forecasting model used by the Oahu Metropolitan Planning Organization (OahuMPO) for the Oahu Regional Transportation Plan 2030 (ORTP) (OahuMPO 2007). The OahuMPO model is based on "best practices" for urban travel models in the U.S. and is consistent with consultation with the FTA. The model is updated approximately every five years to reflect changes in land use, socio-economic conditions, and transportation network improvements. The model is approved by the OahuMPO Technical Advisory Committee. This modeling approach has proven effective in estimating ridership levels in other areas such as Los Angeles County, Salt Lake City, Denver, and Phoenix in the last 10 years.

Ridership projections for the forecast year of 2030 have been developed using the travel demand model, which was calibrated against collected traffic and transit ridership information and then validated against recent counts to be sure it properly represents travel activity in the transportation system (Section 3.2.1 of the Final EIS). An on-board transit survey was completed in December 2005 and January 2006, and the latest socioeconomic information available as of October 2008 was incorporated. Traffic counts were collected in 2005, 2007, and 2008. The model is based upon a set of realistic input assumptions regarding land use and demographic changes between now and 2030 and expected transportation levels-of-service on both the highway and public transit system. Based upon the model and these key input assumptions, approximately 116,000 trips per day are expected to use the rapid transit system on an average weekday in 2030. Since the Draft EIS was published, the travel demand model has been refined by adding an updated air passenger model (which forecasts travel in the corridor related to passengers arriving or departing at Honolulu International Airport), defining more realistic drive access modes (driving alone or car pooling) to project stations and recognizing a more robust off-peak non-home-based direct demand element (trips that do not originate at home) based on travel surveys in Honolulu.

The Project is one of the first in the country to design and undertake an uncertainty analysis of this type of travel forecast. The uncertainty analysis evaluates the variability of the forecast by establishing likely upper and lower limits of ridership projections. FTA has worked closely with the City during this work effort. A variety of factors were considered in the uncertainty analysis, ranging from variations in assumptions regarding the magnitude and distribution patterns of future growth in the Ewa end of the corridor, to the impact of various levels of investment in highway infrastructure, to the expected frequency of service provided by the rapid transit system, to park-and-ride behavior with the new system in place, and to such things as the implications on ridership of vehicle and passenger amenities provided by the new guideway vehicles. Given all the factors considered, the anticipated limits for guideway ridership in 2030 is expected to be between 105,000 to 130,000 trips per day, bracketing the official forecast of 116,000 riders a day used for all calculations.

Chapter 3 of the Final EIS shows that the best incentive for use of the rail system is the fact that it will take less time than any alternative, including driving, for a large number of people. In addition, the policy to keep fares low with easy, free transfers will make it more cost-effective to use the rail system than driving a car, parking it, and paying for all other incidental costs of daily commuting by private vehicle. The travel forecasting work that forecasts the demand for the Project's services follows FTA requirements and is based on approved transportation and land use plans for the City. The guideway connects many of the major activities within the corridor and many of its neighborhoods and business/retail centers. Many cities in the U.S. and around the world have used this kind of planning approach, and experience shows that it provides a good basis for planning and designing the system and understanding its impacts.

The FTA and DTS appreciate your interest in the Project. The Final EIS has been issued in conjunction with the distribution of this letter. You may view the Final EIS on the Project website at www.honolulutransit.org. You may request a DVD of the Final EIS and additional content through the "Contact Us" tab on the website or by calling the Project hotline at 566-2299. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Status :	Initial Action Needed
Creation Date :	2/3/2009
Creator Affiliation :	
First Name :	Earl
Last Name :	Handy
Business/Organization :	
Address :	47-226 Iuiu Street
Alternative Preference :	
Apt./Suite No. :	
City :	Kaneohe
State :	Hi
Zip Code :	96744
Email :	ehandy@hotmail.com
Telephone :	808-239-8037
Telephone Extension :	
Add to Mailing List :	Standard
Submission Method :	Website
Other Submission Method :	
Submission Date :	02/03/2009
Submission Content/Notes :	I think the route on the city side of Oahu is well thought out. I would like to see a link to the windward side however. The best was to do that would be to seek funding from the federal goverment and connect Pearl Harbour with the Kaneohe Bay Marine Base following the H3 Highway. A station placed as close to the Windward shopping center near the Like Like Hwy would be best. I hope that all the trains acomodate bicycles is some way like the Bart trains in San Fransico where bikes can be taken aboard the last car.

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-334418

Mr. Earl Handy
47-226 Iuiu Street
Kaneohe, Hawaii 96744

Dear Mr. Handy:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

Your comments have been noted; however, the Project has been designed to serve the areas of greatest population and employment on the island most efficiently. A future project could connect to the Windward side, but no such connection is proposed at this time.

To answer your other question, bicycles will be allowed on the system and will be regulated by a bicycle policy. More information on bicycle allowances will be published in the future.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this

letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

01101

Shirley Hasenyager
235 Kuuhoa Place
Kailua, HI 96734-2734
shirleyinhi@aol.com
(808) 262-5069

January 27, 2009

Mr. Wayne Yoshioka
Director, Dept. of Transportation Services
City and County of Honolulu
650 South King Street, 3rd Floor
Honolulu HI 96813

Dear Mr. Yoshioka:

I have numerous concerns about the DEIS for the Honolulu City and County's proposed heavy rail transit system. A few of them are:

1. I do not feel the issue of property acquisition and adequate reimbursement has been fully addressed. What about loss of business during relocation and construction and decreased value already occurring due to anticipation of acquisition and/or lengthy disruption ?

2. The immense adverse visual impact to Honolulu has been minimized and not adequately described. We need to have good, easily understood descriptions of the many stations planned as they will impact a large area that includes schools, homes and businesses. The size of these stations needs to be explained in detail.....the footprint of the station, height and amount of land surrounding each one needed for parking, bus accommodation, etc. How are they to be protected from vandalism, graffiti, and criminal activity?

3. What happens when we have a power outage like the one during a recent storm. This is not something speculative. **This will happen**. How do you propose getting people off of the trains and out of the stations?

4. What accommodation is there for luggage (assuming an airport route) and other large items people will need to be able to carry on a train, either to a place of work or back to their cars after shopping.

There simply has not been an **honest** presentation of the impact of the proposed rail system on businesses and residences on the route, nor the disruption of traffic during a very lengthy construction period. What recourse does a resident of an apartment have when he finds he has a noisy train running in front of his lanai every few minutes, blocking his view, ruining his life and making his apartment worth zero? Is the city prepared to deal with the many law suits that are inevitable?

Yours truly,

Shirley Hasenyager

cc: Mr. Ted Matley
cc: Gov. Linda Lingle
cc: Honolulu City Council

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DIRECTOR'S OFFICE
DEPT OF
TRANSPORTATION SERVICES

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

February 16, 2010

RT10/09-335668

Ms. Shirley Hasenyager
235 Kuuhoa Place
Kailua, Hawaii 96734-2734

Dear Ms. Hasenyager:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 C.F.R. § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following addresses comments regarding the above-referenced submittal:

Your letter will be answered in the same manner as it was submitted.

1. *Section 4.4.3 of the Final EIS presents the mitigation associated with acquisitions, displacements, and relocations for full and partial property acquisitions. Section 4.18.1 of the Final EIS lists the proposed mitigation measures to reduce adverse economic hardships for existing businesses (including small businesses) along the project alignment during construction. The City has a right-of-way team that has contacted each potentially affected parcel owner to discuss potential project impacts on their respective property. All property acquisitions and relocations are subject to the Uniform Relocation Assistance and Real Property Acquisition Policies Act, and the City will follow those procedures. Where relocations will occur, compensation will be provided to affected property owners, businesses, or residents in compliance with all applicable Federal and State laws and will follow the Federal Uniform Relocation Assistance and Real Property Acquisition Policies Act.*

2. *Chapter 2 of the Final EIS shows the location and extent of all project stations in Figures 2-17 through 2-37. In addition, visual effects of the system are addressed in Section 4.8 of the Final EIS. As discussed in Section 8.4 of the Final EIS, the City is conducting workshops with communities that will have rail stations. The purpose of the workshops is to engage the public about rail stations and provide opportunities for residents to contribute ideas about the appearance of station entryways in their areas. Ideas generated at the workshops will be incorporated into the station planning process. For more information and to get involved in this process, please visit the project website at www.honolulutransit.org.*

   Stations will be patrolled and will be closed between midnight and 4:00 a.m. Materials and textures will be graffiti-resistant. Physical deterrents, such as plantings, will be used where appropriate. Graffiti removal is an anticipated maintenance activity.

3. *Since trains and rail stations will be electrically powered, the system's infrastructure is being designed to handle service disruptions. For example, trains will draw power from many points along the route, so an outage in a few areas should not disrupt service to the remainder of the system. If electrical power is lost system-wide, then train brakes are designed to stop the rail cars even without power. Lights will stay on in trains and stations; backup batteries will provide lighting for several hours. The train operations center will communicate with passengers via the public address system and intercom to provide guidance. If power is restored within a short time, service will resume. With a prolonged outage, the operations center will direct passengers to exit the trains and walk along a lighted emergency walkway on the guideway to the nearest station. For those unable to exit rail cars, help will be provided by emergency responders and transit staff. Passengers will be met at the train station by a coordinated response from emergency responders and City transportation workers.*

4. *The luggage policy for the system is not final, but the concept of the policy will be to allow luggage that does not interfere with the safety or comfort of other passengers.*

   The exact impact of construction activity on traffic is not yet known. As discussed in Section 3.5.6 of the Final EIS, a Maintenance of Traffic (MOT) Plan will be developed in advance by the contractor with approval from the City and the Hawaii Department of Transportation. The MOT Plan will identify measures to mitigate temporary construction-related effects on transportation and will address roadway closures for streets identified in Table 3-27 of the Final EIS. As stated in Section 4.18.1 of the Final EIS, several public involvement strategies will be used to inform businesses and the public about construction activities, including roadway detours.

As stated in Section 4.10.3 of the Final EIS, the Project will cause no severe noise impacts. Moderate impacts will occur at upper floors of a few high-rise buildings (as shown in Table 4-18 in the Final EIS). With the recommended mitigation in place (sound absorbing material and wheel skirts), the noise analysis indicates that the new noise generated by the Project will be lower than the existing noise levels in most places.

The project design includes an integrated noise-blocking parapet wall at the edge of the guideway structure that extends 3 feet above the top of the rail. The parapet wall will substantially reduce ground-level noise.

Wheel skirts will increase the benefit from the parapet wall at locations above the elevation of the track. The use of sound-absorptive materials below the tracks in the areas that will experience moderate noise impacts will reduce the Project noise levels from the upper floors to below the impact level. Once the Project is operating, noise levels will be re-measured to confirm that there are no noise impacts from the Project.

Section 4.8.3 of the Final EIS discusses the general consequence of the changes to visual conditions due to the presence of the elevated guideway and states that, "residents living in high-rise buildings adjacent to the project alignment will experience visual changes as a result of the Project."

The Economic Activity section of the Draft EIS (Section 4.2) did not evaluate the impact of the Project on property values because those values are subject to economic forces outside the direct control of the Project. However, as experienced in other cities, the value of properties with access to transit stations is substantially higher than for properties that are distant from the system. In addition, other development, including retail, businesses, schools, etc., could occur near transit stations.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Issuance of the Record of Decision under NEPA and acceptance of the Final EIS by the Governor of the State of Hawaii are the next anticipated actions and will conclude the environmental review process for this Project.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Hawaiian Electric Company, Inc. • PO Box 2750 • Honolulu, HI 96840-0001

EIS

February 6, 2009

Department of Transportation Services
650 South King Street, Third Floor
Honolulu, Hawaii 96813

Re: Honolulu High-Capacity Transit Corridor Project
City & County of Honolulu, Oahu

Thank you for the opportunity to comment on the draft environmental impact statement prepared for the above-referenced project. The following comments were received from the our Engineering and Power Supply Departments:

(1) Engineering/Project Management (Earlynne Oshiro, 543-7825). Numerous existing and planned HECO overhead and underground facilities will be affected by the project location and route. HECO will need continued access to our faculties for operation and maintenance purposes.

(2) Engineering/Substation, Protection & Telecommunications (David Arakaki, 543-7593). Transit facilities in the area of HECO's Iwilei 138 kV Substation may conflict with possible expansion plans for the substation.

(3) Power Supply/Power Plant Engineering (Michael Yuen, 543-7998).

(a) **Honolulu Power Plant.** The transit project proposes to use the Nimitz-Bishop corner of the Honolulu Power Plant for part of the transit station. This corner of the Honolulu Power Plant currently has a storage tank that provides propane for power plant operations. Area is limited at the Honolulu Power Plant, especially during major maintenance periods, so relocation of this tank and loss of the usable area would negatively impact HECO's operation and maintenance activities. HECO requests revision of the station design to avoid the use of the Honolulu Power Plant property.

(b) **Waiau Power Plant.** The proposed transit guideway is routed on Kamehameha Highway in front of the Waiau Power Plant. The plans presented to HECO last year proposed to eliminate the left turn into Kamehameha Highway coming out of the power plant because of guideway column placements. This turn is utilized by large Transmission and Distribution vehicles heading in the Ewa direction. These vehicles can not easily make U-turns so they would have to take a very circuitous route to head back toward the Ewa direction. HECO requests that the guideway column placement be relocated to avoid elimination of this turn.

(4) Engineering/Project Management (Rouen Liu, 543-7245). Please note that HECO's work and associated costs related to the transit project may be subject to approval by the Public Utilities Commission, State of Hawaii. For this and other planning reasons, HECO would prefer to coordinate and plan for electrical needs or relocations as soon as practical.

We appreciate your efforts to keep us apprised of the planning process. As the project progresses, please continue to keep us informed. We will be better able to evaluate any effects on our system facilities further along in the project's development. We request that development plans show all affected HECO facilities, and address any conflicts between the proposed plans and HECO's existing facilities. Please forward the pre-final development plans to HECO for review.

Should it become necessary to relocate HECO's facilities, please immediately submit a request in writing and we will work with you so that construction of the project may proceed as smoothly as possible. Please note that there may be costs associated with any relocation work, and that such costs may be borne by the requestor. Because any redesign or relocation of HECO's facilities may cause lengthy delays, upon determination that HECO facilities will need to be relocated, HECO should be notified immediately in order to minimize any delays in or impacts on the project schedule.

To coordinate HECO's continuing input in this project, I suggest dealing directly with the points of contact noted above. Thank you again for the opportunity to comment.

Sincerely,

Kirk S. Tomita
Senior Environmental Scientist

cc: Ms. Katherine P. Kealoha (OEQC)
E. Oshiro
D. Arakaki
M. Yuen
R. Liu

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

February 16, 2010 RT2/09-299027R

Mr. Kirk S. Tomita
Hawaiian Electric Company, Inc.
P.O. Box 2750
Honolulu, Hawaii 96840-0001

Dear Mr. Tomita:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 C.F.R. § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address comments regarding the above-referenced submittal:

(1) Engineering/Project Management: As presented in Section 4.18.2, Communities and Neighborhoods, of this Final EIS, "Design criteria will govern all new utility construction outside of buildings, as well as the support, maintenance, relocation, and restoration of utilities encountered or affected by project construction."

In addition, coordination will occur with property owners and will include, but not be limited to: underground utility service connections, access or driveway reconstruction, utility disruption, water service, grounding work, demolition, landscape protection, landscape restoration, fencing, mail delivery, and garbage collection. The vertical and lateral clearances of overhead and underground utility lines shall comply with the rules and regulations of the

appropriate utility agency and Hawaii Administrative Rules during final design and approved by the utility agencies. This coordination will include notifying and working with HECO regarding non-State roadways and roadway rights -of-way. Design refinements with all affected HECO facilities will be developed in close coordination with HECO and the design team as final design progresses. Access will be maintained to all HECO facilities, though it may be modified in some locations.

(2) Engineering/Substation, Protection & Telecommunications: Preliminary Engineering (PE) drawings for the Iwilei segment will be submitted to HECO for review and coordination by January 2010. Design coordination will continue through the final design of the Project.

(3) Power Supply/Power Plant Engineering:

(a) Honolulu Power Plant: Locating the Downtown Station at a different site would avoid use of the Honolulu Power Plant Property, and accordingly, alternative sites have been investigated, as was described in the HECO Downtown Plant and Leslie A. Hicks Building Avoidance Alternatives subsection in Section 5.5.2 Historic Sites of the Final EIS. Avoidance alternatives are limited by Honolulu Harbor and by the geometry of Nimitz Highway. Several alternative alignments were considered during the Alternatives Analysis phase, one of which included Queen Street. While this alternative would avoid the HECO property, it would have impacts on historic resources within the Hawaii Capital Historic District. Other small shifts of the station entrance were considered and are not feasible because they would require the demolition of one of the high-rise office buildings or impact Irwin Park. In addition to considering small shifts of the station entrance, two other practical avoidance alternatives were evaluated to relocate the Downtown Station to avoid this property. None of these were feasible design options. Therefore, the Project will use approximately .2 acres of the HECO property in the Ewa corner of the property near Bishop Street. PE drawings for the Downtown Station will be submitted to HECO for review and coordination by January 2010 and design coordination will continue through the final design of the Project.

(b) Waiau Power Plant: Column design along Kamehameha Highway has been revised and the left turn onto Kamehameha Highway from the Waiau Power Plant will be preserved.

(4) Engineering/Project Management: Coordination with HECO will be ongoing throughout the design and construction process. PE design drawings have been submitted to HECO for the First Construction Phase, East Kapolei to Pearl Highlands. The drawings included information showing the location of existing HECO facilities and identified relocation requirements. PE drawings for the Second, Third, and Final Construction Phases will be submitted to HECO in the schedule shown in Figure 2-43 of the Final EIS. DTS has also provided HECO with proposed electrical utility relocation plans and comments and suggestions provided by HECO have been incorporated. Design coordination will continue through the final design of the Project.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Issuance of the Record of Decision under NEPA and acceptance of the Final EIS by the Governor of the State of Hawaii are the next anticipated actions and will conclude the environmental review process for this Project.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Hawaii's Thousand Friends

25 Maluniu Ave., Suite 102., PMB 282 • Kailua, HI 96734 • Phone/Fax: (808) 262-0682 E-mail: htf@lava.net

February 2, 2009

Mr. Wayne Y. Yoshioka, Director
Department of Transportation Services
City and County of Honolulu
650 South King Street, 3rd Floor
Honolulu, Hawai`i 96813

Mr. Ted Matley
FTA Region IX
201 Mission Street, Suite 1650
San Francisco, California 94105

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DEPARTMENT OF THE
DEPT OF
TRANSPORTATION SERVICES

Regarding: Honolulu High-Capacity Transit Corridor Project Draft Environmental Impact Statement/Section 4(f) Evaluation

The DEIS preface states, "The purpose of this Draft Environmental Impact Statement (DEIS) is to provide.... information necessary to make an informed decision, based on a full and open analysis of costs, benefits, and environmental impacts of alternatives considered."

Unfortunately, the DEIS does not provide a full and open analysis of the short and long-term direct, indirect and cumulative social and environmental impacts from the various aspects of the fixed guideway system.

Chapter 1 Background, Purpose and Need

- When the Second City concept was introduced it was billed as a place where people would live and work thus avoiding the long commute into Downtown. Neither businesses nor jobs nor infrastructure have kept paee with housing development thus causing traffic congestion within Kapolei and Ewa and forcing people to still travel long distances to work.
- With more businesses including government offices relocating to Kapolei and a new large shopping center planned how would ridership on the fixed guideway rider ship be affected?
- Figure 1.8 Daily 2007 Transit Trips between Transportation Analysis Areas is totally useless. If this diagram is supposed to show all transit trips – car, bicycle, and bus it missed the point and is nothing but a bewildering maze of blue.

AR00001907

1.6 Potential Transit Markets

- "Despite the large growth of employment opportunities in the Kapolei area, population is projected to outpace and exceed the available employment in the area." "Additionally, there will be a bidirectional flow of traffic throughout the day as more City and State administrative offices move their daily operations to Kapolei and as other employment grows in the area."
- What are the direct and indirect impacts on residents who must travel further from Hawai'i Kai, Aina Haina and the Windward side to get to government operations that have moved from Downtown to Kapolei?
- What are the direct and impacts on the environment and air quality from the additional vehicle traffic traveling longer distances to Kapolei for government services?
- What are the time and cost impacts to residents who ride the bus from East Honolulu and Windward to government offices relocated from Downtown to Kapolei?
- Makakilo is expected to grow by 125%, which is 25% more than Ewa between 2000 and 2030 yet there is no transit system projected to connect to Makakilo. Why?

Chapter 2 Alternatives Considered

Operating Parameters

- This section states, "It is envisioned that bicycles would be allowed on trains."
  - At what point in process will the decision be made on whether to permit bicycles on each train?
  - Will the public have opportunities to comment on what types of bicycle facilities are needed?

Table 2-5 Fixed Guideway Operating Assumptions

- What is the "branch-line headway?"
- How many times along the entire fixed guideway route will trains reach 50 miles per hour or greater?
- At what points along the route will trains reach 50 miles per hour?
- At 50 miles an hour what is the distance needed for a train to stop?
- How many trains will be running to meet the 3 to 10 minute time schedule at each stop?
- What is the purpose of having both elevators and escalators at each station?
- What are the maintenance costs per year for all the proposed elevators and escalators?
- What is the yearly maintenance schedule for all elevators and escalators?
- Will bicycle parking be permitted at each station, train platform and train stop? How many spaces will be allotted for bicycle parking at each station?
- What measures will be used to prevent Hawaii's homeless from sleeping under the stations, platforms and overhead guideway?
- What measures will be used to prevent graffiti on the columns, stations, platforms and *
- What maintenance procedures will be to get ride of graffiti and stay on top of it so that the fixed guideway system does not become a glaring mess of spray paint?

Figure 2-19.

- What are the height, width and length of the Transit Center Bridge? Will there be 20 hour lighting and security?

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Figure 2-20 Pearl Highlands Station

- What are the dimensions of the station - height, width?
- How many cars will the parking garage hold?
- Will the garage be enclosed and have security and lighting?
- What hours will the garage be open?
- Will the parking garage be a shared use with Pearl Highlands Shopping Center? If so, will the Center contribute to the construction and maintenance costs?

Figure 2-22. Aloha Stadium Station

- What are the height, width and length of the Elevated Connecting Bridge? Will it be covered and have security and lighting?

Chapter 3 Transportation

3.2.1 Existing Travel Patterns

- What is the expected percentage of total daily trips of air passengers that now use ground transportation that will use the transit system to and from the airport?
- What percentage of those traveling in the corridor, and not originating or ending at work, will use the fixed guideway system?
- The DEIS is silent on what the public land under the fixed guideway system in between columns will be used for. Without information on specific uses at specific sites it is impossible to envision or assess direct or impacts of the proposed uses. The FEIS must provide information on the types of uses proposed for each column-to-column segment under the fixed guideway.

3.4. Future Conditions and Effects; Build Alternatives

Reverse Commute Markets

- The DEIS states that "Almost four-fold increase in employment is estimated by 2030 for Kapolei, the quick and direct access provided by the fixed guideway system from PUC Development Plan area locations would help address the demand of future reverse commute markets."
- How many new jobs does "four-fold" represent?
- What data was used to determine that there would be a "four-fold" employment increase in Kapolei by 2030?
- What is the estimated percentage of students and faculty living in Kapolei, Ewa, Waianae, Makakilo and North Shore that now attend UH Manoa are anticipated to attend the UH West Oahu campus?
- What is the estimated percentage of UH Manoa students and faculty that will travel to UH West Oahu for classes?
- What other government offices are planned for relocation to Kapolei or Ewa?
- What is "the sum of the travel times in between" East Kapolei and the Pearlridge Station?

Changes in Transit and Private Vehicle Demand

- What data was used to determine that the commute-to-work transit share of the Ewa to Downtown travel would increase from 23 % to between 54 and 56 percent?

Access to Fixed Guideway Stations

- Identify the ways that the 2030 No Build conditions would effect the "gradual

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deterioration of service reliability" of bus service to parts of the island outside of the study corridor?

- What data was used to determine that access to stations by bus or walking would be 85% of "total trips in the a.m. two-hour peak period?" If this is the case then why are large parking facilities and park-and-ride lots planned for only 15% of the projected ridership?

3.4.3 Effects on Streets and Highways

Table 3-21 Column Placement Effects on Streets and Highways

- What are the direct and indirect impacts on travel time by drivers at the sites where median strips will be expanded and travel lanes reduced?
- What are the direct and indirect impacts on pedestrians at locations where sidewalks will be eliminated??

3.4.4 Effects on Parking, Bicycle and Pedestrian Facilities and Freight

Effects on Parking Supply

- The DEIS states that an "Estimated 820 to 960 off-street and 230 to 250 on-street parking spaces would be removed as result of Build Alternatives..."
- The DEIS further states that, "Future development around station areas-new land uses near stations could change the demand for and supply of parking. These factors could influence how people choose to access the stations and where they would park."
- While acknowledging the loss of parking and spill over parking into neighborhoods there is no information on short and long term effects on residents and neighborhoods impacted by spill over and construction parking or businesses that depend on street parking.
- What are the direct and indirect impacts to neighborhoods and businesses near and adjacent to the fixed guideway from spill over and construction?
- Identify the areas that will loose off-street parking and how many parking spaces will be lost at each location?
- Identify the areas that will lose on-street parking and how many spaces will be lost at each location?
- Will any of the removed off-street and on-street parking spaces be replaced? If so how many and where?
- What are the direct, indirect and cumulative impacts of removing on and off street on people attending community events and facilities such as parks, libraries, and schools?

Table 3-24

- What is the safety risks to bike riders when shared roadways are reduced from 16 to 14 feet and from 14 feet to 13 feet?
- If the city wants to encourage bicycle riding as a mode of transportation throughout the island and to and from transit then bike riding should be made safer and not more dangerous as the proposed lane reductions seem to be doing.

3.4.5 Mitigation of Long-term Transportation Effects

- Stating that "there is available parking on nearby side streets to accommodate people currently using parking spaces that be lost to guideway construction" only increases

crowding of neighborhoods and is not an acceptable mitigation measure. Neighborhood overcrowding from parking is a serious safety and aesthetic problem so the issue should not be casually brushed aside but must resolved through community involvement.

- Information from the "detailed surveys for the affected areas" regarding necessary parking placement should have been included in this DEIS so that the direct, indirect and cumulative impacts from loss of parking, construction and spill over parking could have been evaluated.

3.5 Construction-related Effects on Transportation

3.5.1 Construction Staging Plans

- Construction staging areas and plans should have been identified and the locations included in this DEIS. Without information on staging sites it is impossible to assess the direct, indirect and cumulative social and environmental impacts of each site.
- It is unacceptable to state that "Staging areas are not expected to cause a substantial effect" when locations are not known and environmental, social and cultural impacts have not been evaluated.
- Will there be a public involvement component within each effected community in the selection of construction staging site?
- In Kailua unbeknown to the community, a contractor contracted with a private landowner to use a parcel of land, adjacent to a wetland, for a construction staging. While using the site the contractor placed fill in a portion of the wetland. Vigilant residents spent several years documenting the infraction, which resulted in fines to the landowner and contractor, and partial restoration of the wetland. Play this scenario out over the length of the 20-mile fixed guiderail system and years of delay and trashed environmental resources could be the result of not identifying and evaluating construction sites in this disclosure document.

3.5.2 Construction-related Effects on Transit Service

- The DEIS fails to evaluate the direct, indirect and cumulative impacts on Handi-Van services and residents when bus stops are relocated and bus routes are changed during construction at all segments of the 20-mile fixed guideway system.

3.5.4 Construction-related Effects on Parking

- It is unsatisfactory that the "precise effects on parking during construction" will be left to the individual contractors to handle. Data on construction site selection, construction and community parking needs and mitigation measures should have been included in this DEIS so that social, environmental and cumulative impacts could be evaluated in a comprehensive manner.

3.5.7 Mitigation of Construction-related Effects

Maintenance of Traffic Plan

- Will the proposed "extensive public information program" include a public involvement component or will it just consist of information distribution?

Chapter 4 Environmental Analysis, Consequences, and Mitigation

AR00001911

4.1 Land Use

- This section touts all the proposed and anticipated development projects but fails to mention that not all permits for development have been sought or received.
- This is the built it and they will come scenario. As pointed out the fixed guideway system begins and ends in an empty field.
- Why the fixed guideway didn't begin in Downtown and work outwards is a mystery. One key reason, we believe, is that it would have been much harder sell but would have provided a meaningful transportation option in traffic congested areas. Beginning in an open field surrounded with compliant and willing landowners is a much easier sell.
- The undeveloped field where the fixed guideway system begins is far from most residential areas in Kapolei so people wanting to use the rail system will need to use their cars to reach the station. The DEIS is silent on whether new bus routes will be added to accommodate people who want to take the train or where the bus stops will be located.
- Because the Kapolei station is far away from the Kapolei business district people traveling to work in Kapolei will need to use buses to get to work once in Kapolei. We assume that new bus routes will be created so that people can get to their jobs but the DEIS does not provide information on bus routes or the time it will take to get to the Kapolei business district in the traffic congested Kapolei from the Kapolei station. If the bus travel time combined with the rail travel time is to long or comparable to travel by car people could opt to drive from other destinations instead of using the rail system thus negating the purpose(s) of building the rail.
- The FEIS must provide car and bus travel route and time information to and from the Kapolei station for residents living in Kapolei and information on travel time from various locations along the fixed guideway route for people traveling to the business district for work.
- What is meant by the statement "An assessment of potential changes in land use that could result from the improved mobility that would be provided by the long-term operation of the Project?"
- The DEIS states that the "Waianae end of the project that would serve the area where both population and employment are forecasted to grow by approx 400% area ineludes West Oahu campus, Salvation Army Kroc Center and a master-planned development Ho'opili. All are planned to open between 2009 and 2012. With commercial space envisioned to grow to 7.1 million sq ft compared to 8.4 million sq ft in Honolulu today."
- What are the direct, indirect and cumulative impacts of all the above increased population on the rail system and traffic congestion within Kapolei?
- What percentage of the 7.1 million sq ft of commercial space will be new space, what percentage exists and what percentage is proposed developments that have received permits to build? What are the direct and indirect impacts on commercial businesses in Honolulu from the projected commercial growth in Ewa and Kapolei?
- With the West Oahu campus projected to have 7,600 students and 800 staff and faculty by 2020 what are the impacts on UH Manoa student enrollment?
- The DEIS failed to identify when each of the proposed developments - West Oahu campus, Kroc Center, Ho'opili and new shopping center on Hawaiian Home lands, is projected to be developed in relation to construction of the Kapolei transit station. Without this information it is impossible to evaluate that direct, indirect and cumulative impacts on the environment, water resources, public facilities and traffic. This information must be in

the FEIS.

- It is contradictory to say that TOD special districts within Ewa and Kapolei "would restrict development in agriculture and open space areas" when the Kapolei station, West Hawaii Oahu Campus, Kroc Center and Ho'opili development are all projected to be built on land current designated agriculture.
- If TOD "could occur before the fixed guideway stations are constructed" how does the creation of TOD special districts prevent the conversion of agricultural land to urban uses?
- The DEIS states that approximately 80 acres of prime farmland and 8 acres of statewide important farmlands would be acquired but does not identify where these lands are located and present uses. What is the county zoning for the 88 aces of agricultural land? This information must be provided in the FEIS.
- The DEIS identifies the highly successful Aloun Farm as the largest property facing displacement through acquisition for the 45 acre maintenance facility. How much of the Aloun Farm is prime and/or statewide important agricultural land?
- What is the City zoning for the Aloun farm?
- The DEIS states "Considering that the amount of affected farmland is such a small proportion of all agricultural land on Oahu, the effect would not be significant and no mitigation would be required." What an insensitive statement. The farm is significant to the operators, workers and general public who enjoy the fresh produce and picking pumpkins in the pumpkin patch, the only place on Oahu where that is possible.
- Does the statement that no mitigation is required mean that the Aloun Farm operators, who we assume lease the land although that information is not in the DEIS, will not be compensated for financial losses once the land is no longer available for farming?
- While the DEIS states that land will be acquired for transportation use the DEIS is silent on whether changes in zoning and land use designations and what types of zoning and designation changes will be sought. This information must be provided in the FEIS.
- What is the present zoning for each parcel that will be acquired?
- How many zoning changes and land use designation changes are anticipated for the entire 20-mile fixed guideway system?
- At what point(s) in the process will zoning and land use designations be sought?
- While the Ewa Development Plan is cited as pomoting "higher-density residential and commercial uses along a major rapid transit corridor linking Kapolei with the PUC" this disclosure document does not provide data on what that would look like. Nor does this disclosure document analyze the direct, indirect and cumulative impacts on public facilities, utilities, communities and neighborhoods, population shift, traffic and businesses along the corridor from higher and more concentrated development. The FEIS must provide that information.

Mitigation

- The DEIS states that, "Based on the relatively small number of parcels affected by full acquisitions, the effects on different types of land uses in the study corridor would be minimal."
- We would not know if the "effects" "would be minimal" because precise information on each parcel that will be partially or totally acquired was not given in this disclosure document. Thus, making it impossible to comment on any impact, direct, indirect or

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cumulative, on neighborhoods, communities, businesses, environmental and natural resources and land use patterns.

4.3 Acquisitions, Displacement, and Relocation

The DEIS provides no information on public facility sites land acquisitions. The exact location is not identified nor is information provided on the present use of the land. It is hard to imagine that there will not be impacts by the land acquisition yet without information it is impossible to evaluate the direct, indirect and cumulative impacts.

- Honolulu Community College (0.18 acres)
  - What are the direct and indirect impacts to the College from removing 0.18 acres?
  - Will buildings and students be affected?
  - What purpose is the land being acquired for and how will that use impact the college?
- Waipahu High
  - The DEIS states that acquisition of 0.16 acres effects a "small number of temporary or permanent buildings may be displaced or may require minor modification."
  - What are the direct and indirect impacts from either displacement or modifications to the school, students and faculty?
  - How many temporary and/or permanent buildings will be displaced or modified?
  - Are there sufficient classrooms or other buildings to accommodate the students, uses or faultily that will be displaced by the land acquisition?
  - What will the acquired land be used for and how will that use impact classrooms, students or other school facilities?
- Leeward Community College (3.94 acres)
  - What are the direct and indirect impacts to the college, students and faculty from the acquisition of 3.94 acres?
  - What will the acquired land be used for? How will that use impact surrounding buildings, classrooms and open space?
  - Does the acquisition leave the area unusable?
- UH Manoa Urban Garden Center (.16 acre)
  - What are the direct and indirect impacts of acquiring 0.16 acres of the Urban Garden Center?
  - Will the Center still be viable, will programs and opportunities be lost or will the garden have to be relocated because of the acquisition?
  - What will the acquired land be used for and how will that use impact the garden?

Affected Community facilities

- Bethesda Temple Apostolic Church (.05 partial acquisition of land)
- Alpha Omega Christian Fellowship (displaced as part of full acquisition of commercial building where church is located)
- Nimitz Field (.58 acres
- Richardson Field (.05)
- Ke'ehi Lagoon (2.88 acres)
- Aloha Stadium (.08 acres)
- Pearl City Post Office (.06 acres)

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- Federal Building 300 Ala Moana (.34 acres)
- Oahu Correctional Facility (.21 acres)
- City office building (not identified)
- Fort Shafter Army Reservation (acreage and location not given)
  - "Military properties include lands used for military operations as well as residential accommodations for enlisted personnel and their families"
- Makalapa Naval Housing (acreage and location not given)
- Pearl Harbor Complex (acreage and location not given)
- Naval reservation (acreage and location not given)

- The DEIS states that "measures to reduce adverse effects on community facilities would be evaluated during future design. Mitigation efforts would involve coordination with individual property owners as necessary."
  - Will there be opportunities for community discussions on the impacts of public land acquisition? If so, identify the opportunities for public involvement.
- While land acquisition may be within the law residents, businesses and public institutions should be given greater respect than to just be identified and mediated. After all these are people, lively hoods, and places where are children learn and play. In some cases, as with the Banana Patch, a whole community will be displaced. Will they ever get back the lifestyle they have now - don't know and we don't think anyone will ever know because mediation will happen behind closed doors.
- If the parcels slated for parcel or full acquisition were only identified "based on conceptual engineering drawings" when will the actual acquisitions be known? Without accurate acquisition data it is impossible to analyze the direct, indirect and cumulative impacts on public facilities, traffic, communities, neighborhoods and environmental and natural resources.
- Where will property owners, public and private, be officially notified that their property will be partially or fully acquired? How much time notice will they be given?
- What policies and procedures are in place to ensure that people and businesses that are displaced will have "comparable housing that is decent, safe and sanitary…and affordable" and that businesses will have equivalent commercial spaces?
- The DEIS states that "Once it was determined that a parcel would be acquired, the displacement and relocation of residences, businesses and uses were analyzed." What are the results the investigation? Why weren't the results put into this disclosure document so that the direct, indirect and cumulative impacts from full and partial acquisition could be evaluated? That information must be provided in the FEIS.

4.4 Community Services and facilities

Public and community services within ½ mile of project alignment

- The DEIS states that "Countless community facilities, schools, churches, parks and utilities, listed below, have been identified as being within ½ a mile of the fixed guideway."
- Other than a list of affected facilities no information is provided on how properties and/or services will be directly or indirectly impacted.
- How was the use of a ½ mile as a measurement determined?
- At what point(s) within the 26-foot wide fixed guideway system is the ½ mile measured from?

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- Without information on where the ½ mile begins and ends at each point in the 20-mile and without showing exact location of properties within the1/2 mile it is impossible to evaluate direct impacts on buildings, residents, businesses and communities. That information must be provided in the DEIS.
- The DEIS does not provide any information on how many school within a ½ mile of the fixed guideway will be impacted by noise and at what level. This is critical because if the noise is severe then classrooms and other school facilities might require air conditioning, which will be a huge purchase and installation cost as well as yearly maintenance and electrical costs. This information must be presented in the FEIS.
- How many schools will be impacted by noise from the fixed guideway system and what will that impact be to each school?
- Since school facilities are owned by the state but will be impacted by a city project which arm of government will pay for the costs associated with air conditioning?
- What are the noise impacts from the fixed guideway system on outside events held at schools and other public facilities along the 20-mile fixed guideway route?
- The DEIS identified 58 schools within ½ mile of project alignment
- The following schools are adjacent to alignment and directly impacted
    - Honolulu Community College (0.18 acres all alternatives)
    - Kalakaua Middle School
    - Kalihi Kai Elementary School
    - Makalapa Elementary
    - Moanalua High
    - Pearl City elementary
    - St. Joseph Elementary (private)
    - Waipahu High (.16 acres a small # of temporary or permanent buildings may be displaced or may require minor modification in addition to the required purchase of narrow strip of land all alternatives)
    - Waipahu Intermediate
    - Leeward Community College (3.94 acres all)
    - Maoanlua/Aiea community School
    - UH Manoa Urban Garden Center (.16 acre All)
    - Holy Family Catholic Academy (private)
    - Joy of Christ Preschool (private)

The DEIS identified the following community facilities as being directly affected

- Bethesda Temple Apostolic Church (partial acquisition of land (.05)
- Alpha Omega Christian Fellowship (displacement)
- Nimitz Field (.58 acres)
- Richardson Field (.05)
- Ke`ehi Lagoon (2.88 acres)
- Aloha Stadium (.08)
- Pearl City Post Office (.06 acres)
- Federal Building 300 Ala Moana (.34 acres)
- Oahu Correctional Facility (.21 acres)
- City office building (not identified)
- Fort Shafter Army Reservation (location not given)
    - "Military properties include lands used for military operations as well as

residential accommodations for enlisted personnel and their families"

- Makalapa Naval Housing (acreage and location not given)
- Pearl Harbor Complex (acreage and location not given)
- Naval reservation (acreage location not given)

The DEIS identified 93 religious institutions and being within ½ mile with 19 being adjacent

The DEIS identified 5 cemeteries within ½ mile, with 2 adjacent

The DEIS identified 6 libraries, 5 police stations, 3 fire stations and 6 medical facilities within ½ mile of project the alignment.

The DEIS identified 64 parklands and recreation facilities with ½ mile

- Irwin Memorial Park (public)
- Mother Waldron Park (public)

  The Hawai`i Community Development Authority's Master Plan identifies this park as a major community amenity that is crucial open park space as Kaka`ako redevelops into a dense residential area. Since the fixed guideway skirts the mauka boundary of the park what are the direct and indirect impacts on the park and people visiting the park from having an elevated rail system so close?
- Aiea Bay State Recreational Area which received Water and Land Funding are Sec 6(f) resources
- Aloha Stadium
- Navy Housing Community Park (private)
- Navy-Marine Golf Course (military)
- Richardson Field (military)
- Neal S. Blaisdell Park (public) *Received Water and Land Funding are Sec 6(f)
- West Loch Golf Course (public)
- Walker Park (public)
- Future Queen Street park (public)
- Ke`ehi Lagoon Park

- The above lists show that a lot of properties, both public and private, will be impacted by the 20-mile fixed guideway system. This is a huge unprecedented undertaking for our island with unknown implications and ramifications all along the route. Yet, neither data on each property nor a cumulative effects analysis was provided in this disclosure document. Thus, making it impossible to understand or asses direct, indirect or cumulative impacts to the direct properties, public facilities, utilities, communities, neighborhoods and environmental or natural resources.
- While identification of social, recreational, and public facilities is critical lists by themselves are meaningless. There is absolutely no way to evaluate direct, indirect and cumulative impacts to a particular site or collectively when information is not provided.
- The DEIS does not provide information on why the office building that houses the Alpha Church will be purchased. That information must be provided in the FEIS.
- What are the direct and indirect impacts to the vendors at the Aloha Stadium swap meet from the fixed guideway system and station planned for the stadium?
- It is unacceptable to state in this disclosure document that, "Measures to reduce the adverse effects on individual community facilities would be evaluated during preliminary and final engineering design." The time to "evaluate effects" is during the disclosure phase not after.

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- What measures that will be used "to reduce the adverse effects on individual community facilities" must be provided in the FEIS.
- Since this avoidance to detail path has been chosen we predict that there will be countless delays when residents become aware of the threats to their schools, community facilities and neighborhoods.

4.4.3 Environmental Consequences and Mitigation

- While the DEIS states that properties that meet the Federal criteria under Section 4(f) resource have been evaluated that evaluation information is not in this disclosure document.
- Why weren't the evaluation findings published in this disclosure document so that reviewers could comment on possible direct, indirect and cumulative impacts on the resource and surrounding environment?
- That information must be provided in the FEIS.

Public Services Common to all Build Alternatives

- The DEIS mentions that a Maintenance Traffic Plan will be developed during final design to manage traffic and emergency services during construction.
- Since traffic and availability of emergency services will be major problems during all phases of construction and after completion of the 20-mile fixed guideway system why wasn't a Maintenance Traffic Plan developed and included in this disclosure document? That information must be provided in the FEIS.

4.5 Neighborhoods

- The DEIS states that the "Project transects 9 city-designated neighborhoods." "How is a "designated neighborhood" defined and where are the nine neighborhoods located?
- What approvals will the City need from the Hawai`i Community Development Authority (HCDA) before construction of the fixed guideway can begin in Kaka`ako?
- What is the meaning of "projects life cycle?"
- The DEIS states that "The transit agency could experience 3 types of crimes; crimes against persons, crimes involving transit property and other crimes committed on transit property." What are the other crimes that are anticipated to occur on transit property?
- How many security guards will be hired? How many will be stationed at each station? Will there be security personnel at each station and platform the 20 hours of operation? Will there be security personnel on each train?
- Will there be surveillance cameras at each station and platform?
- Transit Oriented Development is being encouraged around transit stations yet there is no information about the types of zoning changes that will be sought at each location to allow for higher density development. Without location and zoning information it is impossible to evaluate the indirect and cumulative impacts of higher density on infrastructure, traffic, businesses, public and community facilities and adjacent communities. Information on zoning and stations identified for TOD must be provided in the FEIS.
- The DEIS states that "There is a public perception that community cohesion would be adversely affected by the Project. Because the Project would be constructed primarily

within an existing transportation corridor in developed areas, it would not divide or bisect any communities beyond existing conditions."

4.5.3 Environmental Consequences and Mitigation

- It is not satisfactory to say that "potential new development and redevelopment along the project alignment, as well as the scale of the transit system itself, **may** affect the character of development along the alignment" or that "This change in character **would not have a substantial effect** on the existing development pattern or community character within the surround neighborhoods?" (Emphasis added)
- Substantial is in the eyes of the beholder. It is obvious that the fixed guideway system 30-40 feet in the air will impact residents and businesses in affected areas so they deserve to know how their community, businesses and neighborhood will be impacted. Instead, this document just gives out platitudes.
- What data and measurements were used to determine that changes to the character of a community and surrounding neighborhoods would not be substantial?
- Residents need information and must have the ability to be directly involved in decision making before staging sites are selected, parking spaces removed, lanes closed, bus routes closed or changed etc
- This DEIS was supposed to provide in-depth information on the economic, social welfare, and public health of each community along the 20-mile fixed guideway route yet that information is non-existent.
- What factors were considered in reaching the conclusion that though "...there would be adverse effects to these neighborhoods" "no mitigation is required?"

Mitigation

- The DEIS states that "Ongoing coordination efforts with the public will help develop design measures that would enhance the interface between the transit system and the surrounding community" but does not state what the coordination efforts will be nor does the DEIS define what represents the "surrounding community." Outreach and coordination must be broad so that information dissemination, conversations and decision-making encompasses neighborhoods that may be affected by secondary impacts.
- What out reach techniques will be used to contact business owners and residents to ensure that those directly and indirectly affected will be informed about construction projects?
- What types of "design measures" will enhance the columns as they run through communities?
- What types of "design measures" will soften the columns, the elevated concrete structures containing the rail tracks and steel-on-steel noises as the train travels through communities every 3-10 minutes?
- What "design measures" will alleviate the noise from construction?
- What "design measures" will alleviate parking and traffic problems when parking spaces and parking for construction workers, transit riders and others move into adjacent neighborhoods?
- What "design measures" will alleviate the inconvenience and disruption when sidewalks and travel lanes are closed, bus stops moved and bus routes changed?

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- The more important question is why are these critical decisions being put off until the design phase and not brought forward in this disclosure document for comprehensive evaluation of direct, indirect, cumulative and secondary impacts on neighborhoods, residents and businesses?

4.6 Environmental Justice

4.6.2 Affected Environment

- The list below identifies some of the social and community resources in OMPO EJ area but no information is provided on each facility or how it will be impacted by the fixed guideway system.
  - Goodwill
  - Pu`u wai Momi
  - Pu`uwai Momi Housing Complex Teen Center
  - Salt Lake Apartments
  - Institute for Human Services.
- It is interesting that the most impacted minority community – the Banana Patch was not identified when the OMPO method was used to identify Environmental Justice communities. The Banana Patch was only identified as a 100% minority EJ community after public outreach identified the community as an EJ area of concern.
- What mitigation measures will be used to move families living in the Banana Patch to comparable multi-generational living spaces and conditions, which is an agricultural subsistence lifestyle within an urban setting?
- Because of the broader communities involvement a community meeting, including the participation of a FTA Civil Rights Officer, will be held in the Banana Patch
- What other EJ communities did the OMPO EJ technique miss?
- Generally, environmental justice has to do with the disproportionately negative and heavy impact of activities involving the environment on the health and living conditions of communities of color and low-income communities. Environmental justice revolves around not only who is disproportionately affected by an environmental activity, but also WHO DECIDES? Typically the decision-makers do not reflect the groups who will be affected by their decisions.
- Usually residents in the underserved and poorer communities are unaware of issues and do not participate in government actions. This could be for many reasons: financial, non-English speaking. What efforts will be made to inform residents from EJ communities of pending changes and impacts on their community from the fixed guideway?
- The DEIS did not give any consideration to the higher occupancy density in home residences that's common in the identified communities and the anticipated and unanticipated impacts of the guideway transit system affect on environmental and social health. This information and analysis must be done before the DEIS is accepted.
- To elevate undue strain on identified EJ low-income and minority communities residents must provided information and included in decision-making. Translated information informing affected communities about impacts from construction and a whole host of other changes must be distributed in a way that will encourage and attract participation.
- From the conclusion made in the DEIS "That ....it has been determined that here are equal effects on the OMPO EJ areas and non-EJ areas" and "there are no disproportionately high or adverse effects on OMPO EJ areas" it seems that EJ

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communities will be left out of the decision making process once again. Is that what is meant by this statement?

- The DEIS states that there will be impacts, as shown below, but does not identify the direct, indirect or cumulative effect of each of the impacts on the community or neighborhood. Such information must be provided in the FEIS.
  - Impacts from right-of-way acquisition
  - Impacts to community cohesion
  - Impacts to social and cultural resources
  - Visual quality impacts
  - Noise and air quality impacts
  - Traffic and transportation impacts
  - Short-term construction impacts
- There is no information in the DEIS about the Section 8 low-income housing that will be displaced in Waipahu by the fixed guideway system. This too, like the Banana Patch, seems to have escaped OMPOs EJ guidelines?
- What are the direct, indirect and cumulative impacts of displacing people living in Section 8 housing? Will the city assist residents in finding comparable housing?

4.6.4 Public Outreach

- While "Important project notifications" were placed in various ethnic and cultural newspapers it is unclear if information was translated into the languages of people reading those publications? If not, will future notifications be translated into the languages of the people in the effected communities?
- Were public reading materials placed on the website and handed out at community events translated into common languages within the identified communities?
- How much community participation was there from the various EJ communities and how many comments were received from non-English speaking community members?
- It is disconcerting to read at this stage in the process that, "Efforts will be made to identify and coordinate with EJ populations to actively solicit their input." This statement tells the reader that so far the outreach does not seem to have been garnered much participation by the most vulnerable and less active members in a community and who do not attend Neighborhood Board meetings, call a hotline or post comments on the website.

4.7. Visual and Aesthetic Conditions

4.7.2 Affected Environment

- Visual resources in the project corridor include landmarks, significant and majestic mauka and makai vistas, historic and cultural sites, parks, open spaces and trees and there is no way to mitigate the visual impact of the 30 to 40 foot high elevated 26 feet wide concrete fixed guideway system.
- No amount of designing, paint color or pretending that it won't be as obtrusive as we all know it will be there is no way to mitigate the impact of the elevated fixed guideway, elevated stations with lights that will cast off glare into the nigh sky and will forever mar our visual horizons.
- The only thing that *might* disrupt the intrusion of the fixed guideway system in some places are tall very tall trees, 30 to 40 feet tall trees. But whether planting trees of that

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height to block the bleak starkness of the 26-foot wide guideway has been considered is not known because that information has not been provided in this disclosure document.

- What are the "policy documents" that identified significant views and vistas and will govern the project corridor? Why weren't these documents included in the DEIS?
- What are the mitigation measures that would alleviate the obvious intrusion, loss of property values and views when the 30-40 foot guideway comes "within 10 feet of some facades along Dillingham Boulevard?"
- The fixed guideway system and Chinatown Station 30 feet above Nimitz will be a dominant visual element and bifurcate historical Chinatown from its historical connection to the Honolulu waterfront. Some things can't be mitigated and this is one of them.
- In downtown views from the 4th and 5th floors would be blocked and trains would create light and glare and stations would increase this effect. The guideway and columns would change the visual character of the streetscape and the historical disconnection between downtown and the waterfront. There are no mitigation measures that can mitigate these impacts.
- On Halekauwila Street the guideway and columns would also block views from the 4th and 5th floors and increase light and glare on upper stories. Visual effects would be high and property values would be low. Can't have an elevated train whizzing by outside your window and expect peace and quiet, fresh air and breezes and reasonable value for your property should it need to be sold.
- What changes are proposed for historic Halawa Bridge that will substantially change its appearance?

4.9 Noise and Vibrations

- The DEIS identified the properties, listed below, as being affected by noise.
- Over a 26-mile route it cannot be that just these properties will be affected by noise. The FEIS must identify all other properties that will be impacted by noise.
  - 94-340 Pupumomi St – moderate impact to 5th floor and above
  - 1000 Kamehameha at Kauhale St: 14 buildings with moderate impact at ground level
  - 860 Halekauwila: moderate impacts to 6th floor and above
  - 113 Waimanu: moderate impacts to 7th through 9th floors
- One direct impact will be the loss of property value due to noise from the fixed guideway system traveling 30-40 feet past residential and business windows.
- What are the direct, indirect and cumulative impacts from loss of property value for properties affected by noise from the fixed guideway system?
- One direct effect on individual effect will be the loss of breezes and fresh air as residents adjacent to the fixed guideway system will be forced to close their windows and air condition their home. In this age of reducing energy use to eliminate green house gases it is ironic that more people will be resorting to air conditioning due to the fixed guideway system and this can only be expected to get worse as Transient Oriented Developments are build along the 26-mile fixed guideway system.
- It is interesting that the DEIS points out that "Severe noise impacts are considered significant within the context of NEPA and HRS 343." Yet, the DEIS does not consider noise to be significant since it states that "It is not practical to avoid severe impacts by

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changing the location of the project, mitigation measures must be considered and incorporated into the project unless there are truly extenuating circumstances that prevent it." Without moving the alignment away from buildings the only remedies that come to mind to block out noise from a steel-on-steel train whizzing by 30-40 feet in the air is to close the windows and air condition your home. What a shame.

- Identify the locations where "project noise level would be equal to or above the severe impact level" and "a sever impact would occur."
- What constitutes a "sever impact" and what, if any, mitigation measures would be used to moderate noise levels?

4.12 Ecosystems

Migratory Waterbirds

- The DEIS states that "the only protected waterbird that nests in Hawaii is the black-crowned night heron." That is incorrect.
- There are many species of waterbirds in Hawai`i, including the endangered Hawaiian duck, endangered Hawaiian stilt, endangered Hawaiian coot, and endangered Hawaiian gallinule. All are endemic to Hawai`i. The 'auku`u, or heron, is indigenous. All of them nest in Hawai`i, although not all on all islands. There are also a number of migratory waterfowl, and ducks, such as the mallards, and shorebirds.
- The statement that "Over time, the waterbirds would adjust to new structures built for the Project...and avoid the structures" is probably true but Hawaii's water and migratory birds have never had to compete with a fast moving unyielding object 30 to 40 feet in the air before.
- Unfortunately, the Ecosystems and Natural Resources Technical Report didn't discuss what will happen when water and migratory birds encounter a train high traveling 30 to 40 feet through the night sky other than to say "over the long term these birds are expected to adapt to the new elevated guideway structure and the presence of the trains, as they have adapted to the presence of highway traffic." A train traveling high in the sky is different from many lanes of cars. The potential impacts on water and migratory birds should not be so summarily dismissed but data should have been provided and direct, indirect and cumulative impacts on water and migratory birds should have been analyzed. Until all impacts are analyzed and understood this DEIS should not be approved.
- The Technical Report also did not address the effects a constant stream of lights in the cars and on the trains traveling up to 50 miles an hour 20 hours a day would have on water and migratory birds. Information on the impacts must also be analyzed and understood before this DEIS is accepted.
- While the Technical Report acknowledged that, "Construction activities adjacent to the springs and other water bodies where the waterbirds were observed may temporarily affect their feeding habitats" the short and long-term impacts on individual water and migratory birds and cumulative impacts on the species was not analyzed.
- During the observation for the Report several federally listed endangered stilts were present along the alignment and inhabit Waiau and Kalauao Springs (Sumida Watercress Farm). The federally listed endangered common moorhen has been recorded at the Sumida Watercress Farm. The federally protected migratory native black-crowned night heron have been seen at Moanalua Stream, Kalauao Spring and at

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a drainage canal near the Honolulu Airport near Ke'ehi Lagoon.

- Hawaii's federally listed endangered birds are present along the rail alignment and before this DEIS is accepted the direct, indirect short and long-term and cumulative effects of construction activities, lights on the trains and at the stations, train speed, hours of travel, and height of the rail system on Hawaii's water and migratory birds must be investigated, reviewed, evaluated and incorporated into a technical document.
- The Technical Report stated without providing any substantiating data or analysis that, "The Project would not affect wetland sites such as spring-fed wetlands along the route because with few exceptions, the proposed corridor would use existing roadways." The report did acknowledge that "There may be temporary disturbance of endangered and protected waterbirds when construction activities are in proximity to some of the spring-fed wetland sites, in particular the Sumida Watercress Farm (Kalauao Spring) and Waiau Spring" but then the Report proceeded to say "However, construction is anticipated to be no more than a minor distraction to these birds because they continue to inhabit these wetlands even though they are adjacent to highways that are heavily traveled by vehicles, trucks, and buses, and even though the general area has gradually become more densely developed. Over time, the waterbirds are expected to adjust to new structures built for the Project." While waterbirds may exist at Sumida Watercress Farm and Waiau Spring they are currently not being disturbed by daily noise and other disturbances from construction activities.
- The above conclusions reveal another reason why this DEIS cannot be approved until in-depth analysis of construction activities on water and migratory birds within the corridor is reviewed, understood and measures in place to ensure that the fragile bird population does not collapse from the urbanization of their habitat.
- In addition the Report states that "Construction activities over Moanalua Stream may temporarily affect the availability of foraging sites for black-crowned night herons, but this species is highly adaptable to altered environments and would adapt to new structures built over the stream." It appears that this conclusion was reached without analyzing the direct, indirect and cumulative impacts of the loss of foraging sites would have on black-crowned night herons. Black-crowned night herons may be adaptable but loss of foraging sites may force them to abandon this foraging area and no data or analysis was provided in this DEIS to indicate that they would ever return.

4.13 Water

Wetlands and Streams

- While the DEIS and Technical Report state that no direct impact to Waiau and Kalauao Springs, such as placing piers in either spring, is anticipated neither report analyzed short and long-term direct, indirect impacts and cumulative affects to both springs that might occur during construction such as dewatering.
- Neither report analyzed direct or indirect impacts to the Sumida Watercress Farm operations from construction and the completed guideway system other than to note that the shadow from the elevated guideway system might affect water quality. Even that impact was not evaluated or analyzed.
- The DEIS states that, "Some stream crossings would be required along the alignment. In some instances, the discharge of stormwater from the guideway may increase stromwater inflow to some of these waters. However, because stormwater quality is not

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expected to be adversely affected, no streams or downstream marine waters are expected to experience negative effects." The DEIS does not provide any data or analysis to back up that statement. The DEIS also does not provide data or analysis on the cumulative impacts from roadway runoff and rail runoff on streams.

- The Technical Report noted that the endemic listed 'o'opu nakea while uncommon was present in Waikele and Waimalu Streams. This is good news. The bad news is that the 'o'opu nakea inhabit streams that are within the fixed guideway alignment and so far data and analysis on direct, indirect and cumulative short and long-term impacts to native species within the alignment is not in the DEIS or Technical Report.
- The Technical Report states "Bridge support piers that are 6 to 10 feet in diameter would not inhibit 'o'opu nakea from traversing to the ocean during the twice-a-year spawning period." This leads us to believe that piers will be placed in both streams. Is that true? If so, how many piers will be placed in each stream?
- Unfortunately, the Technical Report does not identify what the impacts to the 'o'opu nakea would be during construction or the length of construction activities in and around the streams. That information is crucial to understanding what is needed to protect the o'opu nakea as it migrates to and from the ocean.
- A positive mitigation measure would be to avoid any construction activities in and around Waikele and Waimalu Streams during 'o'opu nakea spawning periods.
- Does the alignment go over Pu'o'hala Marsh that has been identified as of critical importance to Hawaii's endangered waterbirds? If so, will any structures be placed in the marsh? What are the short and long-term impacts of construction activities to the marsh, waterbird habitat and the water and migratory birds that forage in the marsh?
- All temporary and permanent proposed and potential stream diversions for bridges, park-and-ride lots, parking structures and garages, rail stations and platforms were not identified in the DEIS. The locations must be documented in the FEIS.
- It is unsatisfactory to state that, "Detailed delineation would therefore be a future task to be coordinated during the Project's design phase." While some aspects of the fixed guideway can be put off to the design phase evaluating temporary and permanent impacts to Hawaii's streams and wetlands is one of them. This fixed guideway system is not a surprise. It is not something that was sprung on people a few months ago. To not be prepared to provide data and analysis of impacts, direct and indirect of construction and other activities in and around streams and wetlands within the alignment because "insufficient design information at the planning stage (e.g., the exact location of bridge crossings)" was not known or available is unacceptable. This is another good example of why this DEIS cannot be accepted.
- What is meant by the statement in the Technical Report that "Inspection of streams was limited to the location of specific crossings?" Does it mean that not all streams were evaluated?
- The Technical Report provides a litany of information on the Sumida Watercress Farm including that for approximately 530 feet the proposed guideway would be adjacent to the watercress farm. What the report doesn't say is how close the guideway will be to the farm and what short and long-term impacts a noisy train roaring overhead would have on water and migratory birds who forage and inhabit the farm.
- The Technical Report states that "One major spring-fed wetland system in Kalauao (Sumida Watercress Farm) and an unutilized spring-fed wetland at Waiau" located

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adjacent to the guideway structure "would not cause a direct impact to these wetlands, but shadows cast by the elevated structure may slightly affect water temperatures and affect watercress growth" because the guideway system is within the median of Kamehameha Highway. The Report goes on to say that, "These consequences are anticipated to be very slight to non-existent, based on the proposed guideway's distance from open water and watercress farming areas. Shade would only reach open water and watercress in the late afternoon." What is an "unutilized spring-fed wetland?" Where are the data and analysis of direct and indirect and cumulative impacts to the Sumida Watercress Farm from the daily shadow? Where is the data and analysis of direct, indirect and cumulative impacts to the underutilized spring-fed wetland at Waiau?

- The Technical Report mentions that the alignment would cross Moanalua Stream but doesn't provide any data on how the alignment will or will not temporarily or permanently impact the stream. Later in the Report it is noted that "Construction activities over Moanalua Stream may temporarily affect the availability of foraging sites for black-crowned night herons, but this species is highly adaptable to altered environments and would adapt to new structures built over the stream." Where is the data and analysis that identify the temporary and permanent impacts to the stream and evaluates impacts to the foraging site and direct and indirect impacts to the black-crowned night heron? Black-crowned night herons may be adaptable but they cannot afford to keep loosing their foraging grounds.
- It is unsatisfactory to state that, "Only some sites proposed for maintenance, storage, and other facilities provide this type of habitat, which would be disturbed and eliminated by the facilities required for the Project" without identifying the sites and providing data and analysis on the temporary and/or permanent direct, indirect and cumulative impacts from disturbing or eliminating these sites. The sites must be identified and information and analysis provided in the FEIS.
- The Technical Report states that the "The Project would not affect wetland sites such as spring-fed wetlands along the route because with few exceptions, the proposed corridor would use existing roadways." What are the "few exceptions" located and where is the data and analysis to back up this statement?
- It is unacceptable to state in the Technical Report that "There may be temporary disturbance of endangered and protected waterbirds when construction activities are in proximity to some of the spring-fed wetland sites, in particular the Sumida Watercress Farm (Kalauao Spring) and Waiau Spring. However, construction is anticipated to be no more than a minor distraction to these birds because they continue to inhabit these wetlands even though they are adjacent to highways that are heavily traveled by vehicles, trucks, and buses, and even though the general area has gradually become more densely developed." Where is the data and analysis to substantiate the claim that construction will only be "a minor distraction" and will cause no harm to the waterbirds or their habitat?
- The Technical Report notes that, "Streams that are over 150 feet wide may require in-water piers to support the guideway. These include Waimalu Stream (140 feet), Halawa Stream (225 feet), Moanalua Stream at Nimitz Highway (270 feet), and Ala Wai Canal (160 feet). An in-water supporting pier with a diameter of 6 to 10 feet maybe required to-span these streams." Why isn't data available on whether in-water

piers **will** be required for Waimalu Stream, Halawa Stream, Moanalua Stream and Ala Wai Canal? When will the data and analysis be available? Once again it is unacceptable for information to be missing from this environmental impact disclosure document.

- Is construction activity in the Ala Wai Canal associated with the first 26-miles of the fixed guideway system or with the Waikiki extension? What type of "Accommodations" will be made for paddlers in the Ala Way Canal during construction?
- And finally the Technical Report states that, "Because the Project would avoid all wetlands in the study corridor, no effects on wetlands are anticipated and no mitigation would be necessary." We guess that all that stuff about shadows over Sumida Watercress farm, possible alignment over or near Pu`o`hala Marsh or disturbing waterbirds "when construction activities are in proximity to some of the spring-fed wetland sites" doesn't mean anything.
- In summary, the DEIS lacks sufficient data and analysis needed to make informed evaluations on direct, indirect and cumulative short and long-term impacts from construction projects in or near streams, wetlands, and underground springs and not to mention the perpetual impacts once the fixed guideway is completed. Until data and analysis is provided, reviewed and incorporated into technical documents this DEIS should not be accepted.

Groundwater

- While the DEIS notes that drilled shafts will break through the basalt aquifer in several locations information on how severe the breaks will be or analysis of direct, indirect and cumulative impacts at each site on the aquifer is not provided. This information must be provided reviewed, evaluated, analyzed and incorporated into a technical document before this DEIS can be accepted.
- Has data been collected and analyzed for long and short-term and cumulative impacts on the aquifer from the proposed redirecting of current water runoff patterns at several locations along the alignment? If so, what does the data show?
- The DEIS notes that at each diversion site "There would be no long-term changes to groundwater levels, including artesian conditions, as a result of the fixed guideway system." What data and analysis supports that statement?
- The Technical report states that, "Runoff from the guideway would not likely contaminate groundwater." What data and analysis substantiates this statement?
- Interestingly in another section of the Technical Report it is stated that, "Groundwater encountered by excavations for pile caps that need to be removed is likely to be contaminated with petroleum products at several locations where excavations are required." This is where information and analysis would come in handy.
- The Technical Report acknowledges that "places along the Airport alignment where depths to groundwater would be approximately 10 feet below the surface" and for "the remainder of the First Project alignment, groundwater may be encountered at about 10 feet below the surface." So while it is known that Oahu's sole source aquifer will be breached a cumulative effects analysis has not been conducted. Until relevant quantitative information is provided and analyzed this DEIS cannot be accepted.
- The Technical Report states that, "Dewatering may be required where groundwater is at levels above the base of the pile caps" but there is no data or analysis of impacts of

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dewatering at each site or how will dewatering impact the aquifer?

- Working over Oahu's sole source of drinking water for 26-miles is serious business and cannot be easily dismissed with comments like "No long-term impacts on the SOBA are anticipated." Until **all** short and long-term direct, indirect and cumulative impacts are known, evaluated, analyzed and incorporated into a technical document this DEIS should not be approved.

VIOLATION OF CHAPTER 6E, HAWAII REVISED STATUTES

The Draft Environmental Impact Statement ("DEIS") contains a copy of a letter dated January 10, 2008, from Donna Wong, Executive Director of Hawaii's Thousand Friends ("HTF"), to Wayne Yoshioka. DEIS, App. D, pp. 325-326. In that letter, HTF requested that, with regard to the compliance of the proposed Honolulu Mass Transit Project with the provisions of Chapter 6E, Hawaii Revised Statutes, "it be regarded as an "Interested person" as that term is defined in Section 13-275-2, Hawaii Administrative Rules (HAR) and be accorded all the rights of such persons under Chapter 6E, applicable administrative rules, and all other provisions of law." The letter then described the rights of "Interested persons" and the obligations of the City and County Department of Transportation Services under HAR Chapter 13-275. These provisions afford Interested persons, including HTF, various rights to be consulted during the historic preservation review process conducted by the Department of Land and Natural Resources, State Historic Preservation Division ("SHPD"), that in general parallel the rights of "consulted parties" under Section 106 of the National Historic Preservation Act ("NHPA"). Specific rights include the right to receive SHPD written comments on the proposal and to have HTF's comments on any submittal be considered by SHPD in its review of the Project. Furthermore, SHPD must publish notice of its determinations, and interested persons may appeal SHPD's determinations to the Hawaii Historic Places Review Board.

The DEIS shows that various entities were treated as "consulted parties" under the NHPA and, in September 2008, were sent "one (1) DVD copy of the documents that have been sent to the SHPD as part of our coordination under the National Environmental Policy Act of 1966, as amended and Section 106 of the National Historic Preservation Act. The DVD includes the Purpose and Need and Alternatives chapters of the Draft Environmental Impact Statement (EIS), along with electronic copies of the Archaeological Resources, Cultural Resources, and Historical Resources Technical Reports." See, e.g., Letter Dated September 29, 2008, from Wayne Y. Yoshioka to Ms. Elizabeth S. Merritt, Deputy General Counsel, Law Department, National Trust for Historic Preservation, DEIS App. D, p. 330.

HTF never received a response to its January 10, 2008, letter, and HTF never received the documents sent to "consulted parties" such as the National Trust for Historic Preservation. Accordingly, **HTF has been deprived of its legal rights as an interested person under Chapter 6E.**

The City and County of Honolulu is bound by Chapter 6E, and compliance with the consultation requirements of the NHPA (if such exists) does not obviate the need to comply with the

applicable provisions of Chapter 6E, including the granting to HTF of all of the rights of "interested persons."

A review of SHPD's webpage and its "on-line posting of current compliance reviews" shows that, as of February 4, 2009, no postings have been made since July 25, 2008. SHPD's "archive of past reports" shows no postings for determinations and reviews after 2005. **It thus appears that SHPD has failed to comply with its statutory duty to give public notice of its determinations. Because notice was never given, the 30-day clock for the deadline to appeal SHPD's determinations has not begun to run.**

HTF requests that it now be sent copies of the same documents made available to "consulted parties" (but NOT to HTF) in September 2008 (i.e., the DVD and copies of the Archaeological Resources, Cultural Resources, and Historical Resources Technical Reports) so that it may exercise its rights as an interested party under Chapter 6E. Because Chapter 6E and its rules allows HTF a period of 30 days to review documents submitted to SHPD for its review, HTF requests that it be afforded a period of 30 days from its receipt of such documentation to submit comments and, further, requests that the comment period for the DEIS be extended as necessary to allow HTF's comments to be incorporated into and addressed in the Final EIS.

PROBABLE VIOLATION OF SECTION 4(F) OF THE U.S. DEPARTMENTOF TRANSPORTATION ACT RE: KE'EHI LAGOON BEACH PARK

The DEIS, pp. 5-12 to 5-15, discusses the application of Section 4(f) of the Department of Transportation Act ("Section 4(f)") to Ke'ehi Lagoon Beach Park ("the Park"). The DEIS states that the project alignment for the Airport Alternative and the Airport & Salt Lake Alternative passes directly through the Park and will make direct use of 2.8 acres of this 72 acre park. It is clear from the map provided (Fig. 5-4) will have a significant effect on existing uses of the park and will permanently constrain future park use of the land occupied by the alignment, as well as of that portion of the park located to the north of the alignment.

The DEIS analyzes an alternative routing (illustrated in Fig. 5-5) that would reduce adverse impacts to the Park, while increasing impacts to nearby commercial properties. The FDEIS ultimately rejects this alternative, stating:

> To connect the Airport Station and Lagoon Drive Station, the guideway would pass over several additional commercial properties, resulting in at least nine additional full acquisitions and nine business displacements than the proposed alignment. Further, the Lagoon Drive Station would have to be doubl-stacked (one platform above the other), and the guideway would have to be double-stacked from approximately Peltier Avenue to Ahua Street, a distance of about 600 meters. This, and the right-of-way requirements, would result in an

additional $75 million (2007 USD) in construction costs. For these reasons, this alternative is not considered prudent.

Under Section 4(f), use of parklands may not be authorized for the Project unless the FTA determines that "[t]here is no prudent and feasible alternative, as defined in Section 774.17, to the use of land from the4 property; and [t]he program or project includes all possible planning, as defined in Section 774.17, to minimize harm to the property resulting from such use." DEIS at 5-1.

The DEIS fails to justify its conclusion that no "reasonable and prudent" alternative exists to this use of park land. First of all, the explanation for the claimed necessity of "double-stacking" is wholly conclusory and fails to provide any reasoned explanation of why this method of construction could not be avoided. Furthermore, the DEIS fails to acknowledge that use of the **Salt Lake Alternative**, rather than the preferred **Airport** or **Airport and Salt Lake Alternatives** would appear to provide a "reasonable and prudent" alternative that would avoid any adverse impacts to the Park. **The FEIS should fully address these issues.**

Although this issue is not discussed in Chapter 5 of the DEIS, the DEIS contains a letter dated September 25, 2008, from Wayne Y. Yoshioka of the Department of Transportation, City and County of Honolulu, to Lester K. C. Chang, Director, Department of Parks and Recreation, in which Mr. Yoshioka advises Mr. Chang of "the U.S. Department of Transportation Federal Transit Administration's (FTA's) intent to render a Section 4(f) *de minimis* determination" with regard to the Project's proposed use of Ke'ehi Lagoon Beach Park and obtains Mr. Chang's acknowledgement of this determination. DEIS, Appendix D, at 318-321. **HTF asks that the FTA reconsider this determination and that all documentation setting forth FTA's determination and its justification be included in the FEIS.** Furthermore, the quoted letter contains no justification for this determination beyond the purely conclusory statement that "[t]he park's recreational features and attributes will be fully restored or replaced prior to project completion." **Chapter 5 of any FEIS should fully discuss and explain the justification for this determination, including an explanation of how the loss of 2.8 acres of park land can be regarded as a "*de minimis*" impact.**

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DEPARTMENT OF TRANSPORTATION SERVICES

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DEPUTY DIRECTOR

June 11, 2010

RT2/09-298688R

Hawaii's Thousand Friends
25 Maluniu Avenue
Suite 102, #282
Kailua, Hawaii 96734

Dear Sir:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

Comments on Chapter 1 Background, Purpose and Need

The comment provides background information on the Second City concept. As presented in Chapter 1, Purpose and Need, of the Final EIS, a Project goal is to improve access to planned development to support City policy to develop a second urban center.

Growth in the Kapolei area was considered in the analysis. As stated in Section 3.4.1, Future Travel Patterns, of the Final EIS, "With an almost four-fold increase in employment estimated by 2030 for Kapolei, the quick and direct access provided by the fixed guideway system from PUC Development Plan area locations (e.g., Downtown and Kakaako) will help address the demand of future reverse commute markets. These markets include existing and

planned local government offices and the future UH West Oahu campus. Based on transit travel forecasts, about 15 percent of fixed guideway ridership during the a.m. two-hour peak period would be in the Ewa-bound direction, which demonstrates that the Project supports the goal of improving access to planned development and a second urban center."

Figure 1-8, Daily 2007 Transit Trips between Transportation Analysis Areas, in this Final EIS, illustrates the relative numbers of transit trips between each area. The purpose of this figure is to illustrate that a substantial majority of trips made by transit on the island occur within the study corridor. The figure does not include car or bicycle trips, as car and bicycles are not transit modes as that term is defined for the purposes of the Figure.

The comment is directed at government operations that have moved from Downtown to Kapolei. Moving government offices is not part of the Project. The Project is consistent with City policies relative to directing growth in certain areas and increasing travel options within the study corridor. As explained in detail in Chapter 1, Background, Purpose and Need, the majority of population and employment is now, and will continue to be, concentrated in the study corridor. The City's long-term development plans which were defined long before the Project. These plans included increased employment in Kapolei and are described in the Ewa Development Plan. The Project used them as a basis for understanding and supporting future conditions. Indirect effects regarding future development trends are presented in Section 4.19.2, Indirect Effects, of the Final EIS. It is anticipated that travelers who have government offices as their destination will continue to use current methods of travel.

The comment is regarding moving government services to Kapolei, which is a prior City decision. The Draft EIS does not provide environmental clearance for the City's long-term development plans which were defined and analyzed before the Project. But certain of the future development projects (those which are reasonably likely to occur) are considered in the analysis of cumulative impacts of the Project. However, Table 4-15, 2030 Mobile Source Regional Transportation Pollutant Burdens (kg/day), in this Final EIS presents future air quality impacts that take into account predicted changes in travel patterns due to the Project.

The Project would not relocate any government offices. Bus commuters from East Honolulu and Windward locations to Kapolei will experience improved travel times by transferring to the fixed guideway for the majority of their trip.

The Project will serve Makakilo with feeder bus service. The Ewa plain provides an opportune location to concentrate feeder bus service from Ewa, Kapolei, Makakilo, and points further Waianae. Bus routes and frequencies with the fixed guideway system are shown in Appendix D, Bus Transit Routes, of the Final EIS.

Comments on Chapter 2 Alternatives Considered

As described in Section 2.5.5, Pedestrian and Bicycle Access, of the Final EIS, stations will be designed to encourage and accommodate pedestrian and bicycle access. Bicycles will be accommodated on the trains. In addition to providing bicycle racks or lockers at fixed guideway stations, non-motorized access will be supported by features included in the Design

Criteria that guide the Preliminary Engineering and Final Design of the Project. The Design Criteria provide specific direction for pedestrian and bicycle access features at stations.

Opportunities for public involvement will continue throughout the development of the Project. The station area planning process includes conducting workshops with communities that will have rail stations. For more information and to get involved in this process, please visit the Project website at www.honolulutransit.org.

The Project no longer includes a branch line (a second route between two points) as was previously analyzed. For the Airport & Salt Lake Alternative evaluated in the Draft EIS, the branch-line headway (the time between train arrivals) would have been twice the headway on the combined line, which would have ranged between 6 and 20 minutes.

Trains will reach 50 miles per hour at distantly spaced stations, such as those in Ewa and following Farrington and Kamehameha Highways. The system will not reach 50 miles per hour Koko Head of Moanalua Stream.

Under normal service braking conditions, the train is designed to stop within 900 feet when traveling at 50 miles per hour.

Between 25 and 30 trains will be in operation to meet 3-minute headways. Fewer than 10 trains will be in operation to meet 10-minute headways. Details are presented in Section 2.5.1, Operating Parameters, of the Final EIS.

As stated in Section 2.5, The Project: Fixed Guideway Alternative from East Kapolei to Ala Moana Center via the Airport, of the Final EIS, all buildings, facilities, and vehicles will conform to the applicable Federal, State, and County accessibility guidelines and standards. HRS 100-50 requires that all State or County government buildings, facilities, and sites be designed and constructed to the Architectural Barriers Act/Americans with Disabilities Act Accessibility Guidelines (36 CFR Parts 1190 and 1191). Elevators will provide wheelchair access. Escalators provide necessary passenger capacity to move people through the station.

The system operation and maintenance costs shown in Section 6.4.1 of the Final EIS of $110 million dollars per year in 2030 (Year of Expenditure) dollars include maintenance of elevators and escalators associated with the stations.

The maintenance schedule for elevators and escalators will be developed to provide reliable service. The specific maintenance schedule has not been finalized.

As detailed in 2.5.5, Pedestrian and Bicycle Access, of the Final EIS stations will be designed to encourage and accommodate pedestrian and bicycle access. Bicycles will be accommodated on the trains. In addition to providing bicycle racks or lockers at fixed guideway stations, non-motorized access will be supported by features included in the Design Criteria that guide the Preliminary Engineering and Final Design of the Project. The Design Criteria provide specific direction for pedestrian and bicycle access features at stations.

The majority of the system will travel in roadway medians, which is not conducive to being used as a shelter. Stations will be patrolled and are closed at night when the system is not operating.

Materials and textures will be graffiti resistant. Physical deterrents, such as plantings, will be used where appropriate. Graffiti removal is an anticipated maintenance activity that is included in the projected maintenance and operations costs.

A transit center is not proposed at Leeward Community College Station. Security and lighting will be provided at the station. Figure 2-22, Leeward Community College Station, in this Final EIS shows the proposed layout of the station. Security details are provided in Section 2.5.4, Safety and Security Measures, of the Final EIS. A security plan will be developed and the City will continue to work with the Honolulu Police Department to ensure safety and security at the stations.

Regarding the Pearl Highlands Station:

- *All stations are designed to be 240 feet long and be a minimum of 12 to 30 feet wide at the platform. As shown in Appendix A, Conceptual Plans and Profiles, of the Draft EIS, the platform would be approximately 60 feet above the existing ramp from Farrington Highway to Kamehameha Highway.*
- *As noted in Figure 2-23, Pearl Highlands Station, in this Final EIS, the park-and-ride is designed for 1,600 spaces.*
- *The parking structure will be semi-enclosed (multiple floors, with sides open for natural ventilation) and will have security and lighting.*
- *The garage will be open while the system is operating.*
- *There is no intent for shared use with other facilities at this location.*

The Aloha Stadium Station location shown in Figure 2-22, Aloha Stadium Station (Salt Lake Alternative and Airport & Salt Lake Alternative), of the Draft EIS is no longer proposed as part of the Project. As seen in Figure 2-25 of the Final EIS, an elevated connecting bridge will not be constructed as part of the Aloha Stadium Station.

Comments on Section 3.2.1 Existing Travel Patterns of the Draft EIS

Air passengers are expected to be a very small percentage of overall travel on the fixed guideway. The primary use of the system is expected to provide access to a large employment base in the Airport vicinity and at or near Pearl Harbor. The travel forecasting model includes an Air Passenger Model to forecast air passenger use of the transit system. As shown in Table 3-13 of the Final EIS, in 2030 there will be about 3,500 air passenger trips a day to and from the Airport using transit (bus and fixed guideway) compared to only 1,200 transit trips without the Project.

As shown in Tables 3-4, Daily Transit Trips by Trip Purpose—2007 in this Final EIS, currently, 51 percent of all transit trips either originate or end at work. As shown in Table 3-13, this percentage is projected to stay the same under 2030 No Build Conditions; however, work-related trips will increase to 54 percent of all transit trips in 2030 with the Project. This number includes trips on both the fixed guideway and the bus. The remaining 46 percent of trips are expected to be to and from school, to and from shopping, trips that do not originate or end at work or home, ground access trips by air passengers, or visitor trips.

The majority of the guideway is in existing roadways with columns placed within the roadway median. In most cases, the median below the guideway will be planted with low-maintenance plantings.

Comments on Section 3.4 Future Conditions and Effects; Build Alternatives of the Draft EIS

As shown in Figure 1-6, Employment Distribution for Oahu, in this Final EIS, there were 11,200 jobs in Kapolei in 2000 and there are 53,000 jobs projected for Kapolei by 2030. These numbers reflect the four-fold increase. This information is from the City and County of Honolulu Department of Planning and Permitting, (DPP) 2008.

The specific answers to the details of these comments would be best obtained from the University of Hawaii, which is undertaking the planning for the new campus. The travel demand model is an aggregate model that does not break down individual facilities beyond identifying the general trends for the types of users associated with them. The model will reallocate trips from one campus to another related to the placement of the campus with respect to the potential users in the corridor. College trips are allocated based on student/faculty populations at each facility. The model distributes them based on time of day, not courses offered. More detailed information regarding this issue may be obtained from the University of Hawaii, although more detailed information is not necessary for development of the figures based on the Traffic Demand Forecasting Model utilized for the Project.

DTS is not aware of any specific government office relocations at this time that will be required.

In Section 3.4.2, Effects on Transit, of the Final EIS, the "sum of the travel times in between" the East Kapolei Station and Pearlridge Station is 18 minutes, which reflects the time it would take to travel via fixed guideway from East Kapolei to Pearlridge. This time is calculated by adding the travel times between all the stations from East Kapolei to Pearlridge.

The Travel Demand Forecasting Model forecasts the number of trips by trip purpose (in this case, home-based work trips) and mode of travel by origin and destination (Ewa to Downtown in this case). The number of trips by transit was compared to the number of trips by automobile to determine the transit mode share. The growth in population and employment and the associated increase in congestion on the highway system will force more people to consider the efficient option offered by the rail system. Population and employment data are obtained from the City and County of Honolulu Department of Planning and Permitting, 2008, and are consistent with the ORTP forecast assumptions.

As of June 2009, TheBus operates 108 bus routes. Of those routes, only 13 operate completely outside the study corridor, which accounts for less than 4 percent of the total weekday bus service in terms of revenue hours of service. The balance of service outside of the study area is provided by 35 routes that have a substantial portion of their operation within the study corridor. Consequently, the reliability of service outside of the study corridor is directly related to the impacts of traffic congestion and other factors occurring inside the Project area. For example, Routes 52 and 55 (Circle Island) take over 4 hours to complete a bus trip. About 1/3 of the Circle Island trip is spent within the Project area. Any delay occurring in the Project corridor affects people waiting for that bus to arrive in Kaneohe, Haleiwa, Wahiawa, Mililani or neighborhoods in-between. Even routes operating totally outside of the study corridor can be impacted by conditions inside the corridor. For example, the last scheduled departure of Route 76 from Haleiwa to Waialua is 6:45 p.m. Passengers arriving on Route 52 from Downtown connect to Route 76 to continue their trip home. If Route 52 is operating off schedule, then passengers potentially miss their last connecting bus home. In some cases, Route 76 may be held if the connecting route is not too far off schedule, thus impacting the service of a route operating totally outside the corridor.

The Travel Demand Forecasting Model has been refined since the Draft EIS to account for non-home based direct demand trips (trips that do not begin or end at home) during off peak periods. In addition, the air passenger model (which forecasts travel in the corridor related to passengers arriving or departing at Honolulu International Airport) was updated to reflect current conditions. The Final EIS reflects updated ridership numbers resulting from model refinement. Walk, bike, and bus access now accounts for 90 percent of trips to fixed guideway stations. Mode of access information for each station is presented in Table 3-20 in this Final EIS. As seen in this table, mode of access varies by station location. Park-and-ride facilities are located at stations where placement of such facilities is feasible and appropriate based on demand for drive-to-transit access.

Comments on Section 3.4.3 Effects on Streets and Highways, of the Draft EIS

As shown in Table 3-21, Column Placement Effects on Streets and Highways, in this Final EIS, no travel lanes will be lost as a result of the construction of the Project and, while in some cases lanes will be narrowed, all travel lanes will remain within standard design requirements. As a result, no significant change is anticipated to in-street travel times as a result of lost lanes.

As shown in Table 3-25, Summary of Potential Effects on Bicycle and Pedestrian Systems due to Fixed Guideway Column Placement, in this Final EIS, sidewalks will not be eliminated at any location along the fixed guideway Project.

Comments on Section 3.4.4, Effects on Parking, Bicycle and Pedestrian Facilities and Freight, of the Draft EIS

The estimated number of existing parking spaces to be affected by the Project has been refined since the Draft EIS. The updated number of parking spaces effected by the project and a summary of locations where parking will be removed by the Project, including effects, is

provided in Table 3-24, Potential Effects on Parking and Loading Zones due to Fixed Guideway Column Placement of this Final EIS.

As stated in Section 3.6, Indirect and Cumulative Transportation System Effects, of Final EIS, the cumulative and indirect effect of removing parking spaces to make room for the Project will be that some people who parked in those spaces will either park in another space nearby, will choose another mode to reach their destination, or will not make the trip. The indirect effect of spillover parking around stations will result in an increased demand for existing parking spaces.

Regarding temporary effects on parking from construction, as stated in Section 3.5.7, Mitigation of Construction-related Effects, of the Final EIS, where existing parking is disrupted by construction, signs will be posted directing people to nearby locations with available parking. The public will be kept aware of upcoming work locations, and information will be available on the Project website about parking disruptions and alternatives. On-street parking by construction workers will not be permitted near work sites. During the actual hours of work, only those vehicles absolutely necessary to construction shall be allowed within the safety zone or allowed to stop or park on the shoulder of the roadway with the approval of the City.

Regarding potential spillover parking near stations, as stated in Section 3.4.7, Mitigation of Long-Term Transportation Effects, in this Final EIS, the approach to mitigating the effects of spillover parking will be unique to each station area. The City will conduct surveys prior to starting construction of a station and again within six months after opening of the station to determine the extent of spillover parking near stations and implement one or more mitigation strategies as needed. Strategies to be used include, but are not limited to: parking restrictions (where parking causes safety or congestion problems), parking regulations (meters, time limits), and shared parking arrangements (at locations where parking is available, but dedicated to another purpose such as retail centers, office uses or places of worship). The specific mitigation strategies and the schedule for implementation will be determined as the stations are opened. Implemented strategies will be monitored, and necessary adjustments will be made as needed.

Off-street and on-street parking losses are shown in Table 3-23, Potential Effects on Parking due to Fixed Guideway Column Placement, of the Draft EIS. This table has been revised based on further design of the Project. Updated results are shown in Table 3-24 in this Final EIS.

As stated in Section 3.6.1, Indirect Effects, of the Final EIS, the indirect and cumulative effect of removing parking spaces to make room for the Project will be that some people who parked in those spaces will either park in another space nearby, will choose another mode to reach their destination or will not make the trip. The indirect effect of spillover parking around stations will mean an increased demand for existing parking spaces. As stated in Section 3.4.7, Mitigation of Long-Term Transportation Effects, of the Final EIS, in locations where parking will be removed by the Project, other parking capacity generally exists nearby to accommodate the demand. Approaches to mitigating the effects of lost or spillover parking will be unique to each station area.

Off-street parking will be removed at Leeward Community College to make room for a rail station that will serve the campus. Spaces will be relocated at an alternate location on campus. On-street parking near Mother Waldron Neighborhood Park will be removed; however, additional on- and off-street parking is available nearby.

As stated in Section 3.6.1 of Final EIS, the indirect and cumulative effect of removing parking spaces to make room for the Project will be that some people who parked in those spaces will either park in another space nearby, will choose another mode to reach their destination, or will not make the trip. The indirect effect of spillover parking around stations will result in an increased demand for existing parking spaces.

In a few cases where the right-of-way is limited, it was decided that reducing the roadway width would be preferable to acquiring additional property. With regard to potential safety-related effects of reduced lane widths, a USDOT study found slightly higher accident rates associated with narrower travel lanes and shoulders1. However, all roadway widths will meet the design standards of the American Association of State Highway and Transportation Officials (AASHTO A Policy on Geometric Design on Highways and Streets, 2004), the Hawaii Department of Transportation (HDOT), and the City.

The comment regarding bicycle riding as a mode of transportation has been noted.

Comments on Section 3.4.5 Mitigation of Long-term Transportation Effects of the Draft EIS

As stated in Section 3.6.1 of the Final EIS, the cumulative and indirect effect of removing parking spaces to make room for the Project will be that some people who parked in those spaces will either park in another space nearby, will choose another mode to reach their destination, or will not make the trip. The indirect effect of spillover parking around stations will mean an increased demand for existing parking spaces. Additional information about the April 2009 study is available in Addendum 02 to the Honolulu High-Capacity Transit Corridor Transportation Technical Report (DTS 2009).

Comments on Section 3.5 Construction-related Effects on Transportation of the Draft EIS

As stated in Section 4.18, Construction Phase Effects, of the Final EIS, the maintenance and storage facility, park-and-ride lots, and stations could be temporarily used for construction staging areas. Additional areas would be identified by the contractor as needed and the location would be reviewed and finalized during final design. The contractor will be responsible for obtaining any necessary permits and approvals. The contractor will also be required to mitigate any temporary effects from the construction staging area. As stated in Section 3.5.1, Construction Staging Plans, of the Final EIS, construction staging areas will be determined by the contractor with approval from the City. The contractor is responsible for identifying any necessary permits or approvals. However, as stated in Section 3.5.7, "An extensive public information program will be implemented to provide motorists with a thorough understanding of

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1 U.S. Department of Transportation, December 2000, Prediction of the expected safety performance of rural two-lane highways.

the location and duration of construction activities, as well as anticipated traffic conditions." This applies to construction staging areas as it would to any other aspect of the Project.

There are no effects on wetlands. In selecting sites for construction staging, no wetlands will be used.

Comments on Section 3.5.2, Construction-related Effects on Transit Service of the Draft EIS

TheHandi-Van is a curb-to-curb operation and does not require posted bus stops to board and alight passengers. TheHandi-Van vehicles are able to access businesses, medical facilities, and other destinations using driveways and parking lots since TheHandi-Van has flexibility in selecting a route to a destination. TheHandi-Van services may experience some delays in service during construction in certain areas due to general traffic conditions; however, this will be considered in scheduling.

Comments on Section 3.5.4, Construction-related Effects on Parking of the Draft EIS

As stated in Section 4.18, Construction Phase Effects, of the Final EIS, the maintenance and storage facility, park-and-ride lots, and stations could be used as construction staging sites. Table 3-28, Potential Effect on On-Street Parking During Construction, in this Final EIS shows on-street construction-related parking reductions. The location and duration of parking restrictions will not be determined solely by the contractors. The contractors will be given flexibility to coordinate the Project as efficiently as possible within certain parameters as imposed by the City. In some cases, on-street parking could be unavailable for several months at a time during construction.

Comments on Section 3.5.7, Mitigation of Construction-related Effects of the Draft EIS

There will be a public information program implemented to keep the public informed of construction areas and plans. This program will involve information dissemination and education through the various techniques discussed in Section 8.7, Public Involvement during Construction, of this Final EIS.

Comments on Section 4.1, Land Use of the Draft EIS

Each planned development disclosed in this Final EIS is an independent action of the Project. However, the City takes into consideration current planned development to better understand changing land uses to determine transportation needs for the design year 2030. Individual developers would apply for their development permits and perform any necessary environmental evaluations at the time for their development to the appropriate municipality.

As detailed in Chapter 1 of the Final EIS, the Project supports the planned development of Kapolei and the Ewa area. Section 4.2.2, Affected Environment, of the Final EIS indicates, the Ewa region is a rural and agricultural area that is undergoing urbanization and includes

Kapolei, which is developing as Oahu's 'second city'. The west terminal end of the Project is at East Kapolei. The west end of the Project would serve the area where both population and employment are forecasted to grow by approximately 400 percent. This growth is anticipated to occur either with or without the Project. The Koko Head terminal is at Ala Moana Center.

The potential of the Project to support growth and the environmental impacts of future growth are evaluated in Section 4.19, Indirect and Cumulative Effects, of the Final EIS and in the Honolulu High-Capacity Transit Corridor Land Use Technical Report (DTS 2008b). The impacts of growth in the Project area are also analyzed in local and state environmental analyses of proposed land use and infrastructure projects in the Project area that are summarized in this Final EIS.

Large infrastructure projects, such as the Project, play an important role in determining the amount, density, and pace of land use development. But many other factors determine the amount and type of additional growth in the Project area including market demand, local planning policies, land availability, and the availability of other infrastructure (roads, wastewater treatment, schools, etc.). Future development in the Project area will be greatly influenced by factors outside the control of the Project sponsor or any of the other planned projects. U.S. and Asian economic trends can affect the economy of Hawaii, as well as how, when, and to what degree land is developed on Oahu.

As described in Section 2.5.10, Project Phasing, and further in Section 8.6.9, Construction Phasing, in the Final EIS, to support phased opening, the first construction phase must be connected to a maintenance and storage facility, which requires considerable space. No location has been identified closer to Downtown with sufficient available space to construct a maintenance and storage facility. Therefore, construction will begin between East Kapolei and Leeward Community College. The Project will be constructed in phases to accomplish the following:

- *Match the anticipated schedule for right-of-way acquisition and utility relocations.*
- *Reduce the time that each area will experience traffic and community disturbances.*
- *Allow for multiple construction contracts with smaller contract size to promote more competitive bidding.*
- *Match the rate of construction to what can be maintained with local workforce and available financial resources.*
- *Balance expenditure of funds to minimize borrowing.*

The portion of the corridor in the Ewa direction of Pearl Highlands is less developed than the areas in the Koko Head direction. Right-of-way can be obtained more quickly at the west end of the Project; therefore, overall project construction can begin earlier, resulting in lower total construction costs. Construction is planned to continue uninterrupted in the Koko Head direction from Pearl Highlands to Aloha Stadium, Kalihi, and finally to Ala Moana Center.

As portions of the Project are completed, each will be opened incrementally so that system benefits, even if limited during the initial phases, will be realized prior to completion of construction of the entire Project.

Station figures in Chapter 2 in this Final EIS illustrate the bus connections to the stations in the Ewa area. The individual future routes that accommodate the rail system are shown in Appendix D, Bus Transit Routes, of the Final EIS.

The travel times shown in Figure 3-7, A.M. Peak-Period Transit Travel Times, in this Final EIS, represent the time required to complete a trip from origin to destination, including walking and time spent on a bus. Kapolei is shown as an origin or destination for several travel pairs in this figure. In addition, existing and future bus routes, including route numbers and frequencies, are provided in Appendix D in this Final EIS.

Section 3.4.2, Effects on Transit, of the Final EIS identified transit travel times for selected market pairs. For travel between East Kapolei and Downtown, estimated travel will be approximately 55 minutes. This represents travel from origin to destination assuming at least part of the trip is made via fixed guideway. Auto travel times for this market were not identified, but are already comparable to rail times during peak periods projected for 2030.

The long-term land use effects of the Project are discussed in Section 4.19, Indirect and Cumulative Effects, of the Final EIS. Section 4.19.2, Indirect Effects, of the Final EIS indicates that the increased mobility and accessibility that the Project may provide will also increase the desirability and value of land near the stations, thereby attracting new real estate investment nearby. See response to Comment above that begins: "As detailed in Chapter 1 of the Draft EIS, the Project supports the planned development of Kapolei and the Ewa area."

This comment quotes a statement in the Draft EIS and, therefore, no response needed.

The bulk of future regional land use changes are expected in the study corridor. Most undeveloped land within the study corridor is likely to become urban or suburban. Many already developed lands within the study corridor also are likely to be redeveloped to higher-density uses. Expansion of public services and facilities would be associated with future growth. Such growth would be consistent with community plans. The planned Kapolei extension would result in conversion of approximately 20 additional acres of farmland to transportation use, none of which is actively cultivated.

Regarding impacts of already planned growth in West Oahu on the Project and traffic congestion, it is reasonable to expect that this increased population and employment will generate ridership for the rail system and will tend to reduce traffic congestion generally because of the diversion of vehicular trips to transit trips.

The 7.1 million commercial square feet referenced in Section 4.2.2, Background and Methodology, of the Final EIS, is planned space in West Oahu at the time the Final EIS was written. Neither existing commercial space nor the permitted space was calculated at that time. It is reasonable to assume that the amount of existing and permitted space is a small fraction of the planned total.

The Project supports the projected enrollment by providing additional transportation options. It is reasonable to assume that the West Oahu campus of the University of Hawaii (UH) is intended to serve students in West Oahu as it does now with negligible impact on UH Manoa.

Section 4.19.2 in this Final EIS states that UH West Oahu developments are planned for the campus. In addition, there is the potential for residential and commercial development around the campus. When each development is planned, the potential for transit-oriented development (TOD) in this area is likely and discussed further in this section as a possible indirect effect of a nearby transit station. TOD is discussed in Sections 4.2, Land Use and 4.19, Indirect and Cumulative Effects, in this Final EIS.

The UH West Oahu campus, the Kroc Center, and the Hoopili development were all planned, independent of the Project and will proceed without it, per Section 4.19.2 in this Final EIS. The Project will use some agricultural land and will cause some of the agricultural land to be developed especially near stations. However, in the No Build Alternative (i.e., without the Project) the amount of agricultural land likely to be converted to suburban development will be substantially more because of already planned developments and the continued growth pressures on West Oahu.

Planning for the TOD special districts is the responsibility of the City and County of Honolulu, Department of Planning and Permitting, under a process covered by the City's new TOD Ordinance 09-4 and is not part of this Project. TOD is discussed in Sections 4.2, Land Use and 4.19, Indirect and Cumulative Effects, in this Final EIS.

As discussed in Section 4.2.3 of the Final EIS, the only farmlands that will be acquired for the Project are in the Ewa Plain. Because the properties are relatively large, only a small portion of each agricultural parcel will be acquired. Some of the designated lands are not currently in active cultivation. Approximately 80 acres of prime farmland and 8 acres of statewide-importance will be acquired by the Project, of which 70 acres are actively cultivated. This acreage is designated for agriculture by County zoning. All of the affected properties designated as prime, unique, or of statewide importance and/or actively being farmed are owned by individuals, corporations, or agencies that plan to develop them in conformance with the Ewa Development Plan (DPP 2000).

Figures 4-7 and 4-8, Designated Agricultural Lands, in this Final EIS indicates that all of the agricultural land at Aloun Farms that would be displaced by this maintenance and storage facility is prime agricultural land. It should be noted that this is not the preferred location of the maintenance facility. While only one site will be selected, two sites are currently under consideration: a 44-acre vacant site near Leeward Community College, which is the preferred location for the maintenance and storage facility, and a 41-acre area currently in agricultural use (Aloun Farms) adjacent to an electrical substation in Hoopili (shown on Figures 2-38, Leeward Community College Maintenance and Storage Facility Location and Conceptual Layout, and 2-39, Maintenance and Storage Facility in Hoopili Location and Conceptual Layout, in this Final EIS).

Much of the farmland acreage that could be acquired for the Project is located at one of the two alternatives for a maintenance and storage facility. The preferred alternative is a former

Navy fuel storage and delivery facility near Leeward Community College. If it is acquired, agricultural land used for the project will be about 47 acres. The Final EIS identifies the existing land use, and where information is available, planned future use of land that would be affected by the Project.

The agricultural land in question is planned to be developed, independently of the proposed Project. The land is not planned to remain in agriculture and the impacts of loss of agricultural land have been or are being addressed in the entitlement process for the planned development. There are no legal or regulatory requirements to replace agricultural land as there are regarding impacts to wetlands. The Project has been designed in compliance with the Ewa Development Plan.

Aloun Farms has 1,115 acres of prime land and 75 acres of agricultural land of Statewide Importance. Total farm acreage is approximately 1300 acres.

The Aloun Farms property is currently zoned as "AG-1, Restricted Agriculture District."

The term 'significant' as used in Section 4.1.3, Environmental Consequences and Mitigation, of the Draft EIS is in reference to the impact on the property, rather than the significance of Aloun Farms. To clarify the discussion of impact, 'significant' has been replaced by 'substantial' in Section 4.2.3, Environmental Consequences and Mitigation, in this Final EIS to clarify the discussion of impact.

Aloun Farms leases land from D.R. Horton. In the event of relocation, tenants who own buildings, structures, or other improvements to be acquired will be paid fair market value of the real property to be acquired. As discussed in Section 4.4, Acquisitions, Displacements, and Relocations in this Final EIS, compensation will be provided to affected property owners, businesses, or residents in compliance with all applicable Federal and State laws and would follow the Federal Uniform Relocation Assistance and Real Property Acquisition Policies Act.

The Project creates little new impervious surface and, therefore, there is minimal new stormwater. As the design moves forward, the expected amounts of stormwater are being calculated. For example, the first portions of the guideway to be constructed will increase stormwater runoff from 0.17- 1.31 cfs (cubic feet per second) per 1,000 feet of guideway according to preliminary calculations. This is for the drier part of the island, but this is where the first construction will occur. In wetter areas, the amount of stormwater runoff will be higher, but as there is little new impervious surface being created by the Project, the amount of additional stormwater will remain small in this areas as well.

The vehicles do not require lubricants like automobiles or buses which would contaminate runoff from the guideway. The pollutants from the guideway track would include brake dust and track flange (soy-based) lubricant. Fugitive dust from wind erosion in undeveloped areas of the Project may also collect on the guideway and be carried in the stormwater. These pollutants will be removed from the stormwater as necessary to meet the required water quality standards. Transit vehicles will have closed passenger windows to help control litter that could generate solid waste.

Appendix C of the Final EIS includes the tax map key number and general land use type for each parcel that will be acquired.

Rezoning and redesignation of land uses are municipal and State government functions and, therefore, not within the purview of this Project. In March 2009, the City Council approved and the Mayor of Honolulu signed Bill 10 (2008) (Ordinance 09-4), which defines the City's approach to TOD around fixed guideway stations. Here, zoning regulations will address parking standards, new density provisions, open space, and affordable housing. While the Project is coordinating with City and State agencies with regard to land use designations near the stations, the actual zoning changes and the timeframe of these changes are beyond the scope of the Project.

While the Project is coordinating with City and State agencies to encourage land use changes near the stations, the actual zoning changes and the timeframe of these changes are beyond the scope of the Project.

It is outside the purview of the EIS to analyze what the future impacts of the Ewa Development Plan may be. This Plan is a product of the City and County of Honolulu's Department of Planning and Permitting and is not a part of this Project.

As stated in Section 4.2.3, Environmental Consequences and Mitigation, of the Final EIS: "Property that would be acquired for the Project represents approximately 1 percent of the total acreage within the study corridor." Compensation will be provided to affected property owners, businesses, or residents in compliance with all applicable Federal and State laws and would follow the Federal Uniform Relocation Assistance and Real Property Acquisition Policies Act. Indirect and cumulative effects on land use are discussed in Section 4.19 of the Final EIS. As noted in Section 4.19.2, Indirect Effects, of the Final EIS, the Project "...will influence the distribution of development." At a regional level, the bulk of future land use changes would occur as already expected under the respective development plans.

Comments on Section 4.3, Acquisitions, Displacement, and Relocation of the Draft EIS

The acquisition of 0.3 acre of land from Honolulu Community College would have no substantial direct or indirect impacts on the College. Seven light posts will be removed and there will be some impacts to a lawn area. The mitigation is to replace light posts. The property use agreement will be negotiated with the University of Hawaii system.

The acquisition of 0.16 acres of land from Waipahu High School would have no substantial direct or indirect impacts on the high school. There would be three temporary buildings that would be relocated to another part of the school's campus. The acquired land will be used as part of the alignment and is not expected to impact classrooms, students, or other school facilities.

The acquisition of 3.94 acres of land from Leeward Community College would have no substantial direct or indirect impacts on the college. The acquired land would be used for a

station and power substation and would not impact surrounding buildings, classrooms, and open space.

The acquisition of 0.16 acre of land from UH Manoa Urban Garden Research Center would have no substantial direct or indirect impacts on the urban garden center. The center would continue to operate as usual. The acquired land, along the perimeter frontage but not on the active part of the urban garden, would be used to widen the Kamehameha Highway and would not impact the garden center.

As described in Section 4.4, Acquisitions, Displacements, and Relocations in this Final EIS, a partial acquisition typically is either a narrow strip of land or a more substantial portion of a large parcel. It is assumed that for the properties that would be partially acquired, existing land uses would not change. In addition, where landscaping, sidewalks, and driveway access would be affected by the Project, coordination would occur with the land owner, and these property features would be replaced and/or the property owner would be compensated.

All of the Projects impacts to the natural and built environment were disclosed including impacts to public lands. The public was invited to review the Draft EIS document and provide written or verbal comments. The Draft EIS was available for public review beginning November 21, 2008 and comment was accepted through February 6, 2009. The community had the opportunity to give testimony at a series of Draft EIS hearings held on December 6, 8, 9, 10, and 11, 2008. A summary of the comments received and responses are included in Section 8.6, Draft EIS Comments, in this Final EIS. All responses to comments are presented in Appendix A of the Final EIS.

Opportunities for public involvement will continue through the design and construction phases of the Project. The City is conducting workshops with communities that will have rail stations. The purpose of the workshops is to engage the public about rail stations and give opportunities to residents and businesses to contribute ideas about the appearance of the station in their area. Ideas generated at the workshops will be incorporated into the station planning and design process. For more information and to get involved in this process, please visit the Project website at www.honolulutransit.org.

Public involvement activities will continue throughout the construction period as described in Section 8.7, Public Involvement during Construction, of the Final EIS.

Acquisitions, displacements, and relocations will be addressed on a case-by-case basis as discussed in Section 4.4 of the Final EIS, and property that would be directly affected by the Project will be purchased at market rates. As stated in Section 4.4.3, Environmental Consequences and Mitigation in this Final EIS "....compensation would be provided to affected property owners, businesses, or residents in compliance with all applicable Federal and State laws and would follow the Federal Uniform Relocation Assistance and Real Properly Acquisition Policy Act. Specific mitigation measures are listed in Section 4.4.3 in this Final EIS.

There is no reasonable alternative to avoid impact to the Banana Patch community. An avoidance alternative was evaluated in the Draft EIS to avoid the Solmirin House, which at that time was thought to be a historic property eligible for the National Register of Historic Places (NRHP). Since the release of the Draft EIS the SHPD determined that this property was not

eligible. Based on the analysis in Chapter 5, Section 4(f) Evaluation, of the Draft EIS there is no feasible alternative for the location of the Pearl Highlands Station.

DTS has been coordinating with residents of the Banana Patch community since October 2008. Every household has been visited by DTS staff, Right-of-Way staff, and Engineering staff to discuss the Project, special needs, and relocation assistance.

A special community meeting was held at the Alpha Omega Christian Fellowship Church. Invitations were sent to each Banana Patch community household. At this meeting, a brief presentation was given on the Project and public testimony was recorded by a court reporter. A complete transcript is included in Appendix A, Comments Received on the Draft EIS and Responses in this Final EIS.

DTS will continue to work with individual property owners to provide relocation services. As stated in this Final EIS, in Section 4.4.3, "...to all affected business and residential property owners and tenants without discrimination; and persons, businesses, or organizations that are displaced as part of the Project would be treated fairly and equitably."

The acquisitions for the Project will be finalized during the final design process. The parcels identified in this Final EIS present the anticipated right-of-way needs for the Project.

As stated in Section 4.4, Acquisitions, Displacements, and Relocations, of the Final EIS, the Project would follow procedures outlined in the Uniform Relocation Act and Regulation 49 CFR Part 24 for relocation assistance. Under this plan, a minimum 90-day written notice would be provided before any business or resident would be required to move.

Acquisitions, displacements, and relocations will be addressed on a case-by-case basis as discussed in Section 4.4 of the Final EIS and property that would be directly affected by the Project will be purchased at market rates. As stated in Section 4.4.3, Environmental Consequences and Mitigation [Acquisitions, Displacements, and Relocations], of the Final EIS "....compensation will be provided to affected property owners, businesses, or residents in compliance with all applicable Federal and State laws and would follow the Federal Uniform Relocation Assistance and Real Properly Acquisition Policy Act (49 CFR 24)." Specific mitigation measures are listed in this Section of the Final EIS.

Table 4-4, Acquisitions and Displacements Summary, in this Final EIS presents a summary of the acquisitions and displacements associated with the Project.

Comments on Section 4.4, Community Services and Facilities, of the Draft EIS

Community facilities that will be impacted by the Project are listed in Table 4-6, Affected Community Facilities and Services, in this Final EIS. Table 4-6 has been updated since the release of the Draft EIS to reflect additional information for community facilities impacted by the Project. Indirect and Cumulative Effects are discussed in 4.19 in this Final EIS.

A distance of ½ mile is a typical measurement to capture the general community facilities within the Project corridor. The Project study area looked beyond the properties and uses immediately adjacent to the guideway alignment.

In the Draft EIS, 1/2 mile was measured from the centerline of the Project alignment. In the Final EIS, the community facilities within 1/2 mile of the alignment were identified from Geographic Information System data, Internet sources, field verification, and plans to provide an overview of facilities near the Project alignment. The analyst used this information to determine the direct impacts as discussed in Section 4.5, Community Services and Facilities, of the Final EIS.

As stated in Section 4.10.3 of the Final EIS, the Project will cause no severe noise impacts. Moderate impacts will occur at upper floors of a few high-rise buildings (as shown in Table 4-18 in the Final EIS). With the recommended mitigation in place (noise blocking parapet wall, sound absorbing material and wheel skirts), the noise analysis indicates that the new noise generated by the Project will be lower than the existing noise levels in most places.

The project design includes an integrated noise-blocking parapet wall at the edge of the guideway structure that extends three feet above the top of the rail. The parapet wall will substantially reduce ground-level noise.

Wheel skirts will increase the benefit from the parapet wall at locations above the elevation of the track. The use of sound-absorptive materials below the tracks in the areas that will experience moderate noise impacts will reduce the Project noise levels from the upper floors to below the impact level. Once the Project is operating, noise levels will be re-measured to confirm that there are no noise impacts from the Project.

Appendix B of the Draft EIS and Appendix C of the Final EIS illustrate the right-of-way acquisitions of the Project in greater detail. Section 4.19 in this Final EIS discusses the Indirect and Cumulative Effects of the Project.

Appendix B of the Draft EIS and Appendix C of the Final EIS illustrate the right-of-way acquisitions of the Project in greater detail. Section 4.18 of the Draft EIS discussed the indirect and cumulative impacts of the Project. Five of the resources you listed are considered in the Section 4(f) evaluation: Neal S. Blaisdell Park, Walker Park, Aloha Stadium, Keehi Lagoon Beach Park, and (Future) Queen Street Park. The Project impacts on these resources are discussed in more detail in Sections 5.5 and 5.6 in this Final EIS.

The building that houses the Alpha Omega Fellowship Church will be acquired for the Pearl Highlands Park-and-Ride lot.

As stated in 5.4.1 of the Draft EIS with regard to Aloha Stadium, "The operation of the Project would not interfere with the features, attributes, or activities of this property." Therefore, the vendors at the swap meet would not be impaired.

Section 4.4.3 of the Draft EIS states, "Mitigation efforts would involve coordination with individual property owners as necessary to appropriately address effects to community facilities.

In addition, all property would be acquired following the Federal Uniform Relocation Assistance and Real Property Acquisition Policies Act and applicable State regulations."

DTS has contacted and met with all affected property owners.

Comments on Section 4.4.3, Environmental Consequences and Mitigation of the Draft EIS

The Draft Section 4(f) Evaluation is presented in the Draft EIS in Chapter 5. The Final EIS presents an expanded discussion in the Final Section 4(f) Evaluation in Chapter 5.

As stated in Section 3.5.7 of the Draft EIS, the Maintenance of Traffic (MOT) Plan will be developed by the contractor for each phase of construction coordinated and subject to approval by Hawaii Department of Transportation and the City. The Project is committed to such a plan; however, the MOT Plan cannot be developed until final design for the Project is completed to account for all facets of the design.

Comments on Section 4.5, Neighborhoods, of the Draft EIS

As discussed in Section 4.5.2 of the Draft EIS, "Neighborhood Board boundaries were used to define neighborhood divisions." Figure 4-13, Corridor Neighborhoods, of the Draft EIS shows the nine neighborhoods and their boundaries relative to the Project corridor.

A Development Permit will be needed from HCDA before construction can begin in Kakaako. Development permits from HCDA have been added to the table, List of Anticipated Permits, Approvals and Agreements, in Section 4.21 of this Final EIS.

The Project life-cycle includes construction, operation, and eventual re-commissioning or de-commissioning of the Project.

Theft from cars in park-and-ride lots is an example of crime to private property.

As discussed in the Final EIS Section 2.5.4 Safety and Security Measures, a project-specific Safety and Security Management Plan has been developed in accordance with FTA requirements to define the safety and security activities and methods for identifying, evaluating, and resolving potential safety hazards and security vulnerabilities of the system. It establishes responsibility and accountability for safety and security during the Preliminary Engineering, Final Design, construction, testing, and start-up phases of the Project. The Honolulu Police Department, the Honolulu Fire Department, the Honolulu Department of Emergency Management, and the Honolulu Emergency Services Department have been involved in preparing and will be part of implementing the plan. The plan addresses public safety and security concerns, including threats and hazards associated with the Project, specific issues that were identified through community outreach efforts, and design and architectural details to enhance safety.

The Project is focused exclusively on the construction and implementation of rail transit service, which is analyzed in the EIS. Planning and zoning around station areas will be

conducted and established by the City's Department of Planning and Permitting under a process covered by the City's new TOD Ordinance 09-4. Planning for the TOD special districts is the responsibility of the City and County of Honolulu, Department of Planning and Permitting, under a process covered by the City's new TOD Ordinance 09-4 and is not part of this Project. TOD is discussed in Sections 4.2, Land Use and 4.19, Indirect and Cumulative Effects, in this Final EIS.

As mentioned in Section 4.19.2, Indirect Effects, in this Final EIS, TOD is expected to occur in Project station areas as an indirect effect of the Project. For expanded discussion on this topic see the sub-section, Station Area Development, in Section 4.19.2 in this Final EIS.

The text you have cited from Section 4.6.2 of the Draft EIS is correct. The Project would not divide or bisect any existing communities.

Comments on Section 4.5.3, Environmental Consequences and Mitigation of the Draft EIS

The guideway and stations would noticeably contrast with smaller size buildings and change the character of some areas. Currently, most of the residential housing is more prevalent within the mauka areas, and commercial and industrial businesses are primarily within makai areas. The Project will not substantially change this development pattern. Since the transit system would be elevated, it will not create a physical barrier to pedestrian or other forms of travel within the study corridor. It also would not pose a barrier to the social network of the community since it would be located within an existing transportation corridor or in the Ewa area, along a planned future transportation system.

The methodology for addressing effects on neighborhoods can be found in the Honolulu High-Capacity Transit Corridor Neighborhoods and Communities Technical Report (DTS 2008d). As discussed in Section 4.6 in this Final EIS, the Project will not substantially affect community character within the surrounding neighborhoods. The increased mobility for neighborhood residents would generally improve the quality of life, especially for those with limited financial resources and those who may be transit dependent.

The community had the opportunity to give testimony at a series of public hearings that took place in December 2008. See response to Comment that begins: "All of the Projects impacts to the natural and built environment were disclosed..." Project information efforts have been ongoing and potential impacts have been disclosed for public comment. While it is true that there will be temporary construction related impacts like you mentioned, the City is drafting specific design criteria to limit potential impacts to residents, businesses, and communities during construction. More information is provided in Section 8.7 Public Involvement during Construction, in this Final EIS.

Sections 4.3, Economic Activity 4.5, Community Services and Facilities, and 4.9, Air Quality, in this Final EIS provide information on these topics along the study corridor.

In Section 4.5.3 of the Draft EIS, it was concluded that there would be no adverse effects to neighborhoods. Therefore, no mitigation is required with respect to impacts on existing communities.

As discussed in Section 8.4 of the Final EIS, the City and County of Honolulu is conducting station workshops with communities that will have rail stations. The purpose of the workshops is to engage the public about rail stations and give opportunities to residents and businesses to contribute ideas about the appearance of the stations in their area. Ideas generated at the workshops will be incorporated into the station planning and design process. For more information and to get involved in this process, please visit the Project website at www.honolulutransit.org.

DTS will oversee community relations activities performed by contractors for the construction of the Project. As part of this program, the contractors will provide construction information to affected communities, including businesses and residents. The information will advise the community of the potential for impacts, measures to minimize those impacts and the construction schedule. The public information program will identify public meetings, construction advisories, newsletters, and other community outreach plans (to be determined by DTS and implemented by the contractors) to effectively communicate the activities of construction.

DTS has developed Design Criteria to address the City and County of Honolulu's requirements for the Project. Guideway column materials and surface textures will be selected in accordance with generally accepted architectural principals to achieve effected integration between the guideway and its surrounding environment. Landscaping and streetscape improvements will serve to mitigate potential visual impacts.

As stated in Section 4.10.3 of the Final EIS, the Project will cause no severe noise impacts. Moderate impacts will occur at upper floors of a few high-rise buildings (as shown in Table 4-18 in the Final EIS). With the recommended mitigation in place (noise-blocking parapet wall, sound absorbing material and wheel skirts), the noise analysis indicates that the new noise generated by the Project will be lower than the existing noise levels in most places.

The project design includes an integrated noise-blocking parapet wall at the edge of the guideway structure that extends three feet above the top of the rail. The parapet wall will substantially reduce ground-level noise.

Wheel skirts will increase the benefit from the parapet wall at locations above the elevation of the track. The use of sound-absorptive materials below the tracks in the areas that will experience moderate noise impacts will reduce the Project noise levels from the upper floors to below the impact level. Once the Project is operating, noise levels will be re-measured to confirm that there are no noise impacts from the Project.

The Honolulu High-Capacity Transit Corridor Noise and Vibration Technical Report *(DTS 2008f) includes the methodology for the noise analysis including the types of noise meters used for all measurements and the times of the measurement. The technical report can be obtained from the City and County of Honolulu, Department of Transportation Services. The exact site locations are not relevant to the overall impact analysis because per FTA methodology, all measurements were taken in representative locations that are typical of noise sensitive uses in the vicinity of the measurements. Noise impact criteria at each site along the Project alignment is shown in Figures 4-53 through 4-56 in this Final EIS. Additional analyses*

completed following release of the Draft EIS is summarized in Section 4.1, Changes to this Chapter since the Draft Environmental Impact Statement, in this Final EIS.

Construction phase noise effects and mitigation are presented in Section 4.18.5, Noise and Vibration [Construction Phase Effects], in this Final EIS. Measures that may be incorporated where appropriate include:

- *Develop a monitoring plan with noise limits.*
- *Construct temporary noise barriers or curtains.*
- *Equip construction equipment engines with adequate mufflers and intake silencers.*
- *Strategically place stationary equipment, such as compressors and generators.*

Regarding temporary effects on parking from construction, as stated in Section 3.5.7 in this Final EIS, where existing parking is disrupted by construction, signs will be posted directing people to nearby locations with available parking. The public will be kept aware of upcoming work locations, and information will be available on the Project website about parking disruptions and alternatives. On-street parking by construction workers will not be permitted near work sites. During the actual hours of work, only those vehicles absolutely necessary for construction activity will be allowed within the safety zone or allowed to stop or park on the shoulder of the roadway with the approval of the City.

Regarding potential spillover parking near stations, as stated in Section 3.4.7, Mitigation of Long-Term Transportation Effects, the approach to mitigating the effects of spillover parking will be unique to each station area. The City will conduct surveys prior to starting construction of a station and again within 6 months after opening of the station to determine the extent of spillover parking near stations and implement one or more mitigation strategies as needed. Strategies to be used include, but are not limited to: parking restrictions (where parking causes safety or congestion problems), parking regulations (meters, time limits), and shared parking arrangements (at locations where parking is available, but dedicated to another purpose such as retail centers, office uses, or places of worship). The specific mitigation strategies and the schedule for implementation will be determined as the stations are opened. Implemented strategies will be monitored, and necessary adjustments will be made as needed.

As indicated in Section 3.4.3 of the Draft EIS, the guideway placements would not affect traffic operations. Also, sidewalks would not be removed as a result of the Project. Sidewalks will continue to meet Americans with Disabilities Act (ADA) standards. As indicated in Chapter 2 of the Draft EIS, bus service would be enhanced with the Build Alternatives and the bus network would be modified to coordinate with the fixed guideway system; therefore, mitigation relating to bus service would not be necessary. In addition, as stated in Section 2.5, The Project: Fixed Guideway Alternative from East Kapolei to Ala Moana Center via the Airport, in this Final EIS, all buildings, facilities, and vehicles will conform to the applicable Federal, State, and County accessibility guidelines and standards. HRS 100-50 requires that all State or County government buildings, facilities, and sites be designed and constructed to the Architectural

Barriers Act/Americans with Disabilities Act Accessibility Guidelines (36 CFR Parts 1190 and 1191).

As indicated in this Final EIS (Section 3.5.7), a Maintenance of Traffic (MOT) Plan and Transit Mitigation Program would identify measures to mitigate temporary construction-related effects on transportation, including bus service. The Plans will be developed by the contractor for each phase and coordinated by and subject to approval by the City or HDOT (HDOT approval would relate to highways only). As stated in this section, pedestrian and bicycle access would be maintained during construction as much as possible while emphasizing safety. A public information program will be initiated to inform transit riders of service changes during construction.

DTS has developed specifications and Design Criteria to address the City and County of Honolulu's requirements for the Project. Guideway materials and surface textures will be selected in accordance with generally accepted architectural principals to achieve effective integration between the guideway and its surrounding environment. Landscaping and streetscape improvements will serve to mitigate potential visual impacts. In addition, the ongoing station area planning process involves the most fundamental aspects of transit system design.

The City and County of Honolulu is conducting workshops with communities that will have rail stations. The purpose of the workshops is to engage the public about rail stations and give opportunities to residents to contribute ideas about the appearance of the station in their area. Ideas generated at the workshops will be incorporated into the station planning and design process. For more information and to get involved in this process, please visit the Project website at www.honolulutransit.org.

Comments on Section 4.6, Environmental Justice of the Draft EIS

As described in this Final EIS, the Airport Alternative has been selected as the preferred alternative and is considered the Project. As a result, the Salt Lake Apartments will not be affected as they are not adjacent to the Project. The impacts sustained to the Goodwill located near Hekaha Street on Kamehameha Highway are limited to partial strip takes to the property adjacent to Kamehameha Highway. The impacts to other Goodwill locations are not foreseen as other locations are not adjacent to the Project. The Institute for Human Services is on a parcel that is not directly adjacent to the Project and it will not be impacted. However, the adjacent parcel mauka has a partial strip take on Dillingham Boulevard. The Puuwai Momi and Puuwai Momi Complex Teen Center are on the same parcel and a partial strip take is planned for that property adjacent to Kamehameha Highway. Right-of-Way professionals have been working with property owners regarding impacts to property and that will be ongoing throughout design and construction of the Project.

DTS will oversee community relations activities performed by contractors for the construction of the Project. As part of this program, the contractors will provide construction information to affected communities, including businesses and residents. The information will advise the community of the potential for impacts, measures to minimize those impacts, and the construction schedule. The public information program will identify public meetings, construction

advisories, newsletters, and other community outreach plans (to be determined by DTS and implemented by the contractors) to effectively communicate the activities of construction.

No other communities with Environmental Justice populations have been identified by community outreach efforts.

Because of the racial and ethnic diversity, the OahuMPO developed a method to define OahuMPO Environmental Justice Areas that would be more meaningful than the demographics of the island. OahuMPO Environmental Justice Areas are defined as areas where the minority or low-income population concentration was meaningfully greater than the surrounding population.

This method of identification was agreed upon by the City and County of Honolulu's Department of Transportation Services and Department of Planning and Permitting, the State of Hawaii Department of Transportation, the FTA, and the U.S. Environmental Protection Agency.

There will not be any disproportionately high and adverse effects to resources of special importance to environmental justice populations within OahuMPO areas to which the list refers from Section 4.6.3, Environmental Consequences of the Draft EIS. Environmental Justice populations have been engaged through the Project's public outreach efforts, described in Section 8.5 of the Draft EIS. Additional discussion is presented in Section 4.7, Environmental Justice, in this Final EIS.

Section 4.7.of the Final EIS discussed the potential effects on Environmental Justice populations and states, "Because the Project would be constructed primarily within an existing transportation corridor in developed areas, it would not divide or bisect communities beyond existing conditions or the No Build Alternative. Therefore, there would be no adverse effect on community cohesion in OahuMPO Environmental Justice Areas."

No matter what the density of an individual household is, the City will continue to work with individual property owners to provide relocation services if property is to be purchased for the Project. As stated in the Draft in Section 4.3.3, "...to all affected business and residential property owners and tenants without discrimination; and persons, businesses, or organizations that are displaced as part of the Project would be treated fairly and equitably."

Those from whom property is to be acquired will be treated according to the requirements of the Federal Uniform Relocation Assistance and Real Property Acquisition Policies Act. It provides for purchase at fair market value and includes relocation assistance to those affected. The Uniform Relocation Act provides that those in need of relocation must be placed in comparable quarters.

Section 4.6.5, Banana Patch Community, of the Draft EIS describes that DTS has coordinated with this community. Updates on this continued coordination are presented in Section 4.7.5, Banana Patch Community, in this Final EIS.

Section 4.7.4, Public Outreach in this Final EIS describes the public outreach to environmental justice populations. "...particular attention has been paid to identifying and reaching low-income and minority populations that are traditionally underserved and

underrepresented in the public involvement process. This is in accordance with Executive Order 12898 (USEO 1994) and OahuMPO regulations. Materials have been prepared in the major languages or Oahu, and translators have been available upon request at meetings. Information has been distributed through cultural organizations, ethnic associations, housing associations, community development groups and similar organizations."

Public involvement outreach with Environmental Justice populations will continue through design and construction.

The Draft EIS Section 4.6.6 states, "The Project would not result in disproportionately high and adverse impacts within OahuMPO EJ Areas...The Project has and will continue to actively solicit input regarding Project alternatives and design." The Final EIS Section 4.7.3 has been revised to say, "Public involvement efforts to work with environmental justice populations, the elderly, and communities of concern will continue throughout the design and construction of the Project."

Indirect and cumulative impacts are discussed in Section 4.19 in this Final EIS.

There will be no public housing displaced due to the Project in Waipahu or any other neighborhood. Section 8 housing can include private homes or apartments; however, the specifics of Section 8 properties is confidential. The City will work with the occupants of all properties that need to be acquired for the Project. Those from whom property is to be acquired will be treated according to the requirements of the Federal Uniform Relocation Assistance and Real Property Acquisition Policies Act. It provides for purchase at fair market value and includes relocation assistance to those affected. The Uniform Relocation Act provides that those in need of relocation must be placed in comparable quarters; this includes people living in a rented house or apartment who will be displaced because that property is being purchased for the Project.

Where relocations would occur, compensation would be provided to affected property owners in compliance with all applicable Federal and State laws and would follow the Federal Uniform Relocation Assistance and Real Property Acquisition Policies Act. Those from whom property is to be acquired will be treated according to the requirements of the Federal Uniform Relocation Assistance and Real Property Acquisition Policies Act. It provides for purchase at fair market value and includes relocation assistance to those affected. The Uniform Relocation Act provides that those in need of relocation must be placed in comparable quarters. The City would assist all affected persons in locating suitable replacement housing within an individual's financial means.

Comments on Section 4.6.4, Public Outreach of the Draft EIS

"Important Project notifications" including information about scoping meetings and public hearings were placed into ethnic and cultural newspapers islandwide. In addition, translated materials were translated into the 11 major languages (other than English) spoken on the island. Project factsheets have been translated as well. Translated materials have been placed within affected communities and Project representatives have been working with ethnic and cultural communities throughout the process. As the Project continues, representatives will

continue informing and educating affected communities about the Project and will use translated materials as appropriate.

Materials provided on the website and handed out at public meetings have not all been translated into languages other than English. However, the Project team will translate materials as needed and as requested. Project factsheets have been translated into the 10 most common languages spoken (other than English) and can be found on the Project's website.

Project representatives have been engaging members of OahuMPO Environmental Justice populations throughout the Project's process through the Project's Speakers Bureau and through contact with Project representatives. We have not received any comments in a language other than English.

Coordination with OahoMPO Environmental Justice populations has been ongoing throughout the Project. The Final EIS in Section 4.7.4 has been revised to clarify our outreach to these communities. Further information is provided in Chapter 8 of the Final EIS.

Comments on Section 4.7, Visual and Aesthetic Conditions of the Draft EIS

The assessment of visual effect due to the Project as described in Section 4.8.3 of the Final EIS considers changes to the visual landscape and viewer responses to those changes. This includes the existing development along the Project alignment. Within the Project corridor the environment changes from rural at the Wai'anae end of the corridor to dense high-rise development at the Koko Head end.

As part of the design process, the City has developed design principles, which are identified in the Honolulu High-Capacity Transit Corridor Project Compendium of Design Criteria (DTS 2009m) that will be implemented in final design to minimize visual effects of the Project. For example, guideway materials and surface textures will be selected in accordance with generally accepted architectural principles to achieve effective integration between the guideway and its surrounding environment. Landscape and streetscape improvements will mitigate potential visual impacts, primarily for street-level views.

Other measures to address visual impacts of the Project are being developed through the station design and planning process. The initial station area plans and design guidelines were first developed with coordination between DTS and the Department of Planning and Permitting (DPP). The next level of transit station design focuses on integrating individual neighborhood characteristics of the communities served by the stations.

The policy documents that identify significant views and vistas include the Ewa Development Plan *(DPP 2002),* Central Oahu Sustainable Communities Plan *(DPP 2002), and* Primary Urban Center Development Plan. *These documents are referenced through the visual analysis in Section 4.7 of the Draft EIS. The visual effects on Honolulu's Downtown, including the Dillingham Transportation Building are discussed under the Kalihi to Ala Moana Center Landscape Unit heading starting in Section 4.7.3 of the Draft EIS. In addition, please refer to Section 4.15 of the Draft EIS for a discussion of the historic resources qualities of this building and Chapter 5 (Section 4(f) Evaluation) for further discussions of the Project's visual effects.*

The Project's visual effects along Dillingham Boulevard are discussed in under the Kalihi to Ala Moana Center Landscape Unit heading starting in Section 4.8.3, Environmental Consequences and Mitigation [Visual and Aesthetic Conditions], in this Final EIS.

The following mitigation framework will be included in the Project to minimize negative visual effects and enhance the visual and aesthetic opportunities that it creates:

- *Develop and apply design guidelines that will establish a consistent design framework for the Project with consideration of local context.*
- *Coordinate the project design with City TOD planning and DPP.*
- *Consult with the communities surrounding each station for input on station design elements.*
- *Consider specific sites for landscaping and trees during the final design phase when plans for new plantings will be prepared by a landscape architect. Landscape and streetscape improvements will serve to mitigate potential visual impacts.*

Section 4.8.3 of the Final EIS, Design Principles and Mitigation includes information related to the mitigation framework described above. Specifically architecture and landscape design criteria include guidelines regarding site design, materials and finishes, and lighting, which apply to stations, station areas, and the guideway.

The visual effects of the Chinatown Station are discussed under the Kalihi to Ala Moana Center Landscape Unit heading starting in Section 4.7.3 of the Draft EIS. The discussion notes the station and guideway would be the dominant features in views along the Nimitz Highway and that distant views over the Nuuanu Stream and Honolulu Harbor would be partially blocked. The overall objectives and design guidelines for the Chinatown District will be addressed during the ongoing station areas planning process. This process involves fundamental aspects of transit system design with focus on characteristics and preferences of the communities adjacent to stations. Coordination with SHPD has included the Chinatown District.

The comment refers to the description in Section 4.7.3 under the Kalihi to Ala Moana Center Landscape Unit heading of the Draft EIS, which describes effects along Halekauwilla Street. The discussion mentions that overall visual effects in this area would be high. Although exterior lighting would be shielded, blocked views from some fourth- and fifth-story windows and increased levels of light and glare would be considered unavoidable adverse impacts. The EIS also acknowledges that the Project would reduce the open character of the streetscape along the Nimitz Highway, which already presents a physical and visual barrier between Downtown and the waterfront.

Your comment on visual and property value effects is noted.

The guideway would be constructed about 40 feet above the Halawa Bridge, changing the character of its visual setting. This change would be substantial as stated in Section 4.8.3, Environmental Consequences and Mitigation, in this Final EIS.

Comments on Section 4.9, Noise and Vibrations of the Draft EIS

As stated in Section 4.10.3 of the Final EIS, the Project will cause no severe noise impacts. Moderate impacts will occur at upper floors of a few high-rise buildings (as shown in Table 4-18 in the Final EIS). With the recommended mitigation in place (noise-blocking parapet wall, sound absorbing material and wheel skirts), the noise analysis indicates that the new noise generated by the Project will be lower than the existing noise levels in most places.

The project design includes an integrated noise-blocking parapet wall at the edge of the guideway structure that extends three feet above the top of the rail. The parapet wall will substantially reduce ground-level noise.

Wheel skirts will increase the benefit from the parapet wall at locations above the elevation of the track. The use of sound-absorptive materials below the tracks in the areas that will experience moderate noise impacts will reduce the Project noise levels from the upper floors to below the impact level. Once the Project is operating, noise levels will be re-measured to confirm that there are no noise impacts from the Project.

Cumulative impacts related to noise were addressed in Section 4.18 of the Draft EIS.

Section 4.8 discusses in detail visual and aesthetic analysis. Section 4.3 discusses Economic Activity including has property value discussion.

Comments on Section 4.12, Ecosystems of the Draft EIS

Correct. Black-crowned night herons are one of several protected waterbirds that nest in Hawaii. This has been corrected in Section 4.13.3, Environmental Consequences and Mitigation, in this Final EIS.

Hawaii's waterbirds and migratory birds have adapted to multi-lane elevated freeways with thousands of automobiles, buses, tractor trailers, traveling at random intervals, at a rate that is 10 to 20 mph faster than the single track train, see Section 4.13.3, Environmental Consequences and Mitigation, in this Final EIS.

As Hawaii's waterbirds and migratory birds have adapted in the past as discussed above, it is therefore reasonable to state that the birds would adapt over time to a fixed rail train that travels at a slower rate of speed (50 mph).

The statement that there would be a constant stream of lights 20 hours a day is incorrect since lights would not be required for daylight periods which in Hawaii can be as long as 10 to 12 hours. As in the previous response, waterbirds and migratory birds would adapt to the night-time transit, similarly as they have to the lights on the elevated portions of the H-1 Freeway [cite]. The Honolulu High-Capacity Transit Corridor Ecosystem and Natural Resources Technical

Report *(DTS 2008j) provides that shielding of exterior lighting will be part of the Project to minimize visual effects and impacts to wildlife as indicated in Section 4.8.3, Environmental Consequences and Mitigation, in this Final EIS.*

Sections of the guideway that may be built above existing structures in the area may interfere with flights of Newell's shearwater. These seabirds could be disoriented by lights and fly into such structures." Newell's shearwater is discussed in Section 4.13, Ecosystems, in this Final EIS.

Hawaii's waterbirds and shorebirds are highly adaptable and will adjust to noise and construction activity that does not directly occur within the wetlands. If there is some disturbance caused by this activity, it will be temporary. Waterbirds and shorebirds are discussed in Section 4.13, Ecosystems, and Section 4.18.8, Natural Resources, in this Final EIS.

The effects of construction and operation of the rail system on water and migratory birds are adequately analyzed in the Honolulu High-Capacity Transit Corridor Ecosystem and Natural Resources Technical Report *(DTS 2008j) and summarized in this Final EIS. The Project will not have any impact on water and migratory birds because wetlands will remain intact and such birds will adjust to the new structures. This is expected because the waterbirds have continued to occupy the wetlands after construction of nearby buildings and overhead utilities, and the construction of widening of adjacent roads and highways.*

As discussed in Section 4.12.2 of the Draft EIS, endangered birds are found in streams and wetlands along the alignment. These birds would adapt to the rail structure and trains as they have other urban construction. Wetland sites for nesting, rearing young, resting, and foraging will not be affected by the Project.

Hawaii's waterbird populations are highly adaptable to an urbanized environment. What is critical to their survival is the preservation of wetlands that are necessary for nesting, rearing young, resting, and foraging. The Project will not impact wetlands adjacent to the Project.

As long as wetland habitat that provides all the components necessary for a waterbird species survival is preserved, urbanization, per se, will not cause the species' population collapse.

There are limited foraging sites for black crowned night herons where the alignment crosses Moanalua Stream because the embankments are overgrown with mangrove and the water is too deep for the herons to wade in order to forage. Through a study completed since the Draft EIS, it was determined that the bridge will be positioned above this deep water where the birds are not likely to go. As stated in Section 4.13.3, Environmental Consequences and Mitigation, in this Final EIS, the Project will not result in the taking of any protected migratory waterbirds (i.e., the black-crowned night heron and their known nesting areas are remote from the study corridor.)

Comments on Section 4.13, Water of the Draft EIS

The Kalauao and Waiau Spring sources are located mauka (to the north) and upslope of the Project. The distance from the construction areas is approximately 4 miles from Waiau Spring and 1.4 miles from Kalauao Spring. Thus, the short-term construction activities are not expected to affect either spring source.

There should be no impacts to operations at Sumida Watercress Farms. Ingress and egress to the farm will be maintained throughout construction. Construction-related mitigation measures for maintaining water quality are discussed in Section 4.17.7 of the Draft EIS. The shadowing will not affect water quality or watercress cultivation at the farm. The Kamehameha Highway is oriented approximately southeast-northwest and the sun tracks through the sky rising in the east and setting in the west. If any shadows are created on the farm by the Project, they would be in the late afternoon when the sun is beginning to set and the shadowing would be transitory.

There will be no in-water work in Waikele or Waimalu Streams, see Section 4.14.3, Environmental Consequences and Mitigation [Water], in this Final EIS.

The current design does not include placing piers in Waikele and Waimalu Streams. This has been clarified in the text in Section 4.14.3, Environmental Consequences and Mitigation, in this Final EIS.

Fish passage will be maintained during construction.

There will be no in-water work in Waikele or Waimalu Streams; therefore, passage will not be impeded, as stated in Section 4.14.3, Environmental Consequences and Mitigation, in this Final EIS.

Puohala Marsh is approximately 0.25 mile from the railway alignment and will not be affected by the rail structure.

Additional steam delineation work has been conducted since the Draft EIS was released. The locations of all potential and temporary stream diversions are identified in Section 4.14, Water, in this Final EIS.

Preliminary wetland evaluations were made at the Draft EIS stage and no potential impacts were identified. Pier locations, pier spacing, and other design considerations were not known when the Draft EIS was produced. There are no affects to wetlands from the Project. The Project will affect four stream crossings that will require work below the ordinary high water mark as described in Section 4.14.3, Environmental Consequences and Mitigation, in this Final EIS.

The stream was evaluated. Studies generally covered 200 feet in each direction where the alignment crossed the stream.

The guideway is in the median of Kamehameha Highway approximately 100 feet from the farm. As a result of the Project, there would be no effect on water and migratory birds that forage and inhabit the farm, as it is already a noisy urban corridor with tall buildings. Noise impacts to locations along the alignment are presented on Project mapping in Section 4.10, Noise and Vibration, in this Final EIS.

The Honolulu High-Capacity Transit Corridor Project Noise and Vibration Technical Report *(DTS 2008f) includes the methodology for the noise analysis including the types on noise meters used for all measurements and the times of the measurement. The technical report can be obtained from the City and County of Honolulu, Department of Transportation Services. The exact site locations are not relevant to the overall impact analysis because per FTA methodology, all measurements were taken in representative locations that are typical of noise sensitive uses in the vicinity of the measurements. This location does not quality as noise sensitive. Noise impact criteria at each site along the Project alignment is shown in Section 4.10, Noise and Vibration, in this Final EIS.*

An unutilized spring-fed wetland refers to a spring-fed wetland not being used for farming or other agricultural or industrial pursuits. The shadowing will not affect water quality or growing at the farm. The highway is oriented approximately east-west and the sun tracks through the sky rising in the east and setting in the west. The shadows created on the farm by the guideway would be in the very early morning and late afternoon when the sun is low in the sky. Any temperature or growing changes would be extremely minimal and localized. Cumulative effects on wetlands are discussed in Section 4.18.3 in the Draft EIS (and Section 4.19.3 in this Final EIS).

An unutilized spring-fed wetland refers to a spring-fed wetland not being used for farming or other agricultural or industrial pursuits. The shadowing should not affect water quality or growing at the farm. The highway is oriented approximately east-west and the sun tracks through the sky rising in the east and setting in the west. The shadows created on the farm by the guideway would be in the very early morning and late afternoon when the sun is low in the sky. Any temperature or growing changes would be extremely minimal and localized. Cumulative effects on wetlands are discussed in section 4.18.3 in the Draft EIS (and Section 4.19.3 in this Final EIS).

During construction, there will be temporary disturbance at the construction location. Over the long-term, the foraging area at the subject location will not be reduced. Currently, along Moanalua Stream, there are limited foraging sites for black-crowned night herons because the embankments are overgrown with mangrove and the water is too deep to wade in order to forage.

The habitats in the footprint of the Project have been identified in the Draft EIS in Section 4.13, Ecosystems. A portion of the Project's right-of-way includes undeveloped land that could be used for the construction and operation of a maintenance and storage facility. Two site options for this facility are being considered. Agricultural sites and farmland, including the Hoopili maintenance and storage facility site, support a broader diversity of wildlife than urban sites. The preferred alternative site near Leeward Community College lacks the diversity of agriculture sites and farmlands with its dense stands of Guinea grass.

Within much of the corridor, the Project follows existing rights-of-way. The sites where the alignment isn't following existing roadways are in Ewa, and no wetlands are in the vicinity of the alignment in that area.

Here, the construction will be in the median of the highway, not in the wetland located nearby. Further, such construction impacts are temporary, not permanent. Birds in this area have adapted to the surrounding urbanized environment.

The data regarding which streams will need piers was not available for the Draft EIS because this document was based on conceptual design. During the early design phase, we assumed that numerous streams might need to have piers placed in them and the piers would be approximately 150 feet apart. The design will continue into the next phase of project development. As the environmental analysis has been ongoing since the Draft EIS, many design refinements were made to avoid and minimize impacts to streams. Streams affected by structural elements of the Project that will have permanent impacts to Waters of the U.S. are located in a table (of the same name) and discussed in detail in Section 4.14.3. Effects during construction are discussed in Section 4.18, Permits, needed for this in-water work are included in Section 4.21, Anticipated Permits, Approvals, and Agreements, in this Final EIS.

Construction in the Ala Wai Canal, if necessary, would be a part of future extensions and, therefore, is not evaluated as part of this Project (East Kapolei to Ala Moana Center).

Responses to comments on the direct, indirect, and cumulative analysis have been reflected in the additional information included in this Final EIS or clarified in the response to the specific comment made by various commenters. Substantive changes made between the Draft EIS and Final EIS are summarized at the beginning of each chapter in this Final EIS in order to provide a better understanding of the issues of concern. In addition, Chapter 8.1, Public and Community Outreach, in this Final EIS also summarize changes made in this Final EIS and include additional information and explanation on various common topics of concern.

As discussed in previous replies, the shadowing should not affect watercress growth at the farm. The shadows created on the farm by the guideway would be in the very early morning and late afternoon when the sun is low in the sky. Puohala Marsh is approximately 0.25 mile from the railway alignment and will not be affected by the rail structure. Hawaii's waterbirds and shorebirds are highly adaptable and will adjust to noise and construction activity that does not directly occur within the wetlands. If there is some disturbance caused by this activity, it will be temporary. For these reasons, no mitigation is required.

The exact depth of penetration cannot be determined until the structural requirements for the guideway have been met for the subsurface conditions at each site. The impacts on the basalt aquifer have been considered in the Groundwater Impact Assessment completed for the Environmental Protection Agency (EPA), Honolulu High-Capacity Transit Corridor Water Resources Technical Report *(DTS 2008k) available at City and County of Honolulu DTS. The EPA has concurred that the Project should have no significant impacts on groundwater, either during long-term operation of the system or during its construction. The EPA's letter of concurrence is available in Appendix F, Record of Agency Correspondence and Coordination, in this Final EIS. Section 4.18.3, Water Resources, Groundwater, describes the construction*

impacts and best management practices associated with the different methods for drilling the foundations for the Project.

Little new impervious surface is being created by the Project, and therefore, it is unlikely that there will be much new stormwater runoff. As described in Section 4.14.3, Environmental Consequences [Water], in this Final EIS:

Permanent best management practices (BMPs) will be installed as part of the Project to address stormwater quality before the water is discharged to streams or existing storm drain systems. The BMPs will promote a natural, low-maintenance, sustainable approach to managing and increasing stormwater quality.

Permanent BMPs, such as bioretention areas, vegetated buffer strips, dry swales, water quality basin, and structural BMPs with oil/water separators will be considered, as needed, during the park-and-ride site and the maintenance and storage facility design process. Selection of permanent BMPs will be site-specific and may be modified as a result of geotechnical data collection during final design.

Stormwater runoff will be redirected back to recharge ground water in the water table aquifer so there would be no net loss. Any shafts penetrating the basalt aquifer will be resealed with concrete. Please refer to the Groundwater Impact Assessment included with the Honolulu High-Capacity Transit Corridor Water Resources Technical Report *(DTS 2008k) for the more detailed analysis.*

Unlike automobiles or buses, the Project vehicles do not require lubricants, which are often the source of contaminate runoff.

The Honolulu High-Capacity Transit Corridor Hazardous Materials Technical Report *(DTS 2008i) contains additional information on likely pre-existing contamination in the study corridor. In addition, Section 4.12, Hazardous Waste and Material, in this Final EIS summarizes the findings of this Report.*

The foundations of the Project have the potential to impact one or both of the groundwater systems on Oahu. Most of the foundations and drilled shafts will be in contact with the water table aquifer which is generally non-potable and used for irrigation water or industrial uses. This is the groundwater referred to when the depth of 10 feet below ground surface is referenced in the Draft EIS.

Analysis has been completed on the effects on to the Southern Oahu Basal Aquifer, designated as a Sole Source Aquifer by the Environmental Protection Agency. In order for a federally-funded project to be built above a designated Sole Source Aquifer, a Ground Water Impact Assessment must be prepared to meet the coordination requirements of Section 1424(e) of the Safe Drinking Water Act. After evaluating the Ground Water Impact Assessment completed for the Project, the EPA has concurred that the Project will have no significant impacts on groundwater, either during long-term operation of the system or during its construction.

Dewatering during construction is discussed in Section 4.18.8, Natural Resources [Construction Phase Effects]. If dewatering is necessary, an NPDES dewatering permit will be required, and each individual site will be permitted pursuant to applicable NPDES requirements. At all sites where dewatering is necessary, the work will be employed to keep as little water from entering the excavation. Disposing of the water can prove difficult and with the potential subsidence issues, as discussed in Section 4.18.10, thus, the amount of water removed from the ground will be kept to a minimum. Dewatering is not expected to have any effect on the aquifers. Anticipated permits, including potential permits for construction dewatering, are included in Section 4.21, Anticipated Permits, Approvals and Agreements and Approvals, in this Final EIS.

In order for a federally-funded project to be built above a designated Sole Source Aquifer, a Ground Water Impact Assessment must be prepared to meet the coordination requirements of Section 1424(e) of the Safe Drinking Water Act. After evaluating the Ground Water Impact Assessment completed for the Project, the EPA has concurred that the Project should have no significant impacts on groundwater, either during long-term operation of the system or during its construction. The vast majority of the drilled shafts will not penetrate the aquifer and those that do will penetrate less than 20 feet. There may be instances where the shafts need to go deeper to reach durable bedrock due to the variability of lava flow composition and strength necessary to support the pier column foundations. The shafts will be quickly filled with concrete to seal the route for contaminates to enter the aquifer. The Ground Water Impact Assessment is available for review by the public as part of the Honolulu High-Capacity Transit Corridor Water Resources Technical Report *(DTS 2008k).*

Comments on Hawaii Revised Statutes Chapter 6E.

Under Hawaii Administrative Rules (HAR) Chapter 13-275, which you cite in your comment letter, "interested persons" are participants in the historic preservation review process. Under HAR § 13-275-3, SHPD sends its written comments "to any interested persons who have expressed concerns with the project by that point in the process." Interested persons' comments must be submitted in writing to the SHPD. Interested persons are required to contact the SHPD to obtain copies of notices, or to find locations of documents, should they wish to review them. Under these provisions, the burden is on interested parties to communicate with SHPD regarding the State's historic preservation review process. The SHPD, not the City, has the authority under these rules to convey "interested person" status.

Section 4.16 of the Final EIS provides the regulatory context that governs archaeological, cultural, and historic resources and identifies the historic properties eligible for the National Register of Historic Places. The City will comply with Federal and State archaeological, cultural, and historic preservation laws and regulations. There are 33 adverse effects on historic properties. A Programmatic Agreement was prepared in coordination with the State Historic Preservation Officer (through the SHPD) and the Section 106 consulting parties to outline measures to minimize and mitigate Project effects on these resources.

Comments on Section 4(f) De Minimis Use of Ke'ehi Lagoon Beach Park.

Following the public comment period on the Draft EIS, FTA subsequently determined that the use of Ke'ehi Lagoon Beach Park, along with the City's commitment to measures to minimize harm and mitigation of impacts as discussed in Section 5.5.1 of the Final EIS, will have a de minimis impact to the park. The City Department of Parks and Recreation (DPR), the agency with jurisdiction over this property, has been informed of FTA's intent to make a de minimis impact finding. DPR concurs that after mitigation, the Project will not adversely affect the activities, features, or attributes that make the property eligible for Section 4(f) protection.

All of the recreational features, attributes, and activities of the park, other than the four lighted mauka tennis courts, are located makai and away from the Project. The Project will traverse the park near its mauka property line, generally following the alignment of the park's access road until it leaves the park, where it continues on an elevated guideway within the right-of-way of Nimitz Highway. In the park, the Project guideway will be approximately 30 feet wide, between 30 to 35 feet high, and will be elevated above approximately 1 acre of land within the park, primarily in the parking lot and the park access road. Within the park, the guideway will be constructed on approximately 10 columns that will be about 6 feet in diameter, which will result in the use of approximately 280 square feet of park land for the placement of columns.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
Creation Date :	12/8/2008
Creator Affiliation :	
First Name :	Emily
Last Name :	Hawkins
Business/Organization :	
Address :	516 Kaimake Loop
Alternative Preference :	
Apt./Suite No. :	
City :	Kailua
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Telephone :	2625283
Telephone Extension :	
Add to Mailing List :	Both
Submission Method :	Website
Other Submission Method :	
Submission Date :	12/08/2008
Submission Content/Notes :	The question of a route in Salt Lake or at the airport can be easily settled by doing what has been done at Baltimore. Both the airport and train stop are called BWI and if you arrive by train there is a shuttle to the airport which covers a distance longer than the distance between Salt Lake and the airport. Let rail go by Salt Lake with the name HNL.

DEPARTMENT OF TRANSPORTATION SERVICES

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-331512

Ms. Emily Hawkins
516 Kaimake Loop
Kailua, Hawaii 96734

Dear Ms. Hawkins:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall indentify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraph addresses your comments regarding the above-referenced submittal:

While each of the alternatives discussed in the Draft EIS includes trade-offs between benefits and impacts, the Airport Alternative from East Kapolei to Ala Moana has been selected as the Preferred Alternative as described above. As compared to the alternatives discussed in the Draft EIS, the Airport Alternative will carry the most passengers, provide the greatest transit-user benefits, and result in the fewest vehicle hours of delay. It will provide access to employment centers at Pearl Harbor Naval Base and Honolulu International Airport and will serve the Salt Lake neighborhood with connecting bus service. Of the three Build Alternatives addressed in the Draft EIS, the Airport Alternative will have slightly less impacts to the natural and built environment analyzed in the Draft EIS. During the public comment period on the Draft EIS, the public overwhelmingly supported the Airport Alternative. Of the comments that specifically supported one of the alternatives, more than 75 percent were in support of the Airport Alternative. For more information this selection is discussed in Section 2.4 of the Final

EIS. Since publication of the Draft EIS, design has been advanced, further analysis has been completed, and information has been added in response to comments on the Draft EIS and agency coordination. The Final EIS discusses the process that was used to select the Preferred Alternative, how comments were considered in the decision-making process, impacts and mitigation commitments.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

To: Mr Wayne Y. Yoshioka, Director
Department of Transportation Services
City and County of Honolulu
650 South King Street, 3rd Floor
Honolulu, HI 96853

From: Dr Aaron Hebshi
University of Hawaii, Manoa, Bicycling Committee, Chair (Former)
1045A Kalikimaka Street
Honolulu, HI 96817
hebshi@hawaii.edu

Subject: Comments to Honolulu High-Capacity Transit Corridor Project, Draft Environmental Impact Statement/Section 4(f) Evaluation

General comments

UH route is critical. Students are poor, rent around the University is extravagant. Many students work extra jobs to pay for their car (or high rent around UH). As a former Teaching Assistant at the University, it was very obvious that many of the students did not take the necessary time to study at home, possibly in part due to the requirements for working extra time to pay high transportation/rent costs.

A well-lit bicycle hub with showers and theft-deterrents was described as part of the UH Campus Master Bike Plan (2003). Although this plan has not been implemented due to lack of funding, coordination between the city and UH can capitalize on existing schemes to build of a joint bicycle hub at the potential rail transit station planned for UH.

Specific Comments

Page 2-20, "Operation Parameters". I wholeheartedly agree that bikes should be allowed on the trains. Bikes can extend the sphere of ridership by providing crucial options for users to get to and from transit stations. For instance, bicycles can be used to get an individual from home to a transit station, and once at the station, the individual would have the option of parking the bike at the transit station (if the bike is not required post transit ride) or bringing the bike onto the train (if the bike is to be used post transit ride). Concerns with safety can be alleviated by only allowing bikes on designated cars or in designated sections of cars.

Page 2-24, Column 1, 1st paragraph, lines 3-4. I wholeheartedly agree that bike parking should be provided at every transit stop. Bike parking should to be well-lit, secure, and preferably covered from the rain. One of the biggest impediments to bike usage in Honolulu is the high bicycle theft rate. I would recommend installing safety/security personnel at the transit stops, and include in their duty bicycle theft protection.

Page 3-23, Table 3-13 and related text. I would venture that this is a minimum projected benefit, since it doesn't take into account rising gas prices, which will undoubtedly occur again when the global economy picks up.

Page 3-34, Table 3-18 and related text. Was any survey conducted to estimate the importance of bikes as a mode of transportation to access transit stations? And what would be the maximum distance at which an average transit rider would be willing to access stations via walking or via biking? In other words, a non-transit dependent person may be more willing to ride transit if a station can be accessed within 5 minutes of his/her house and also his/her destination. The sphere of accessibility within 5 minutes using a bicycle is much larger than that for walking. I would anticipate seeing hidden benefits not unveiled in this EIS if bicycle ridership is highly encouraged.

Page 3-43, Table 3-24 and related text regarding removal of bicycle lane on Salt Lake Blvd and replacing with shared use lane. The bicycle community has varied opinions on the relative utility of bike lanes vs. shared use lanes. Less experienced/comfortable riders find that bike lanes provide them more confidence and sense of security, and are more willing to use the facility than a shared use lane. More experienced riders are comfortable with either type of facility.

Page 3-43, Table 3-24 and related text. Was any engineering scheme explored whereby the elevated portions of the guideway could have a bike path system travelling underneath it? The city/state should take advantage of any opportunity to increase the miles of bicycle travel facilities.

Page 3-48 and 3-50, section 3.5.5. I appreciate your efforts to mitigate for construction-related effects on pedestrians and bicycles.

Please direct any questions to my address above.

Sincerely,

Aaron Hebshi

cc
OEQC
Mr. Ted Matley, FTA Region IX

DEPARTMENT OF TRANSPORTATION SERVICES

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WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

February 16, 2010

RT1/09-294742R

Dr. Aaron Hebshi
Bicycling Committee
University of Hawaii Manoa
1045A Kalikimaka Street
Honolulu, Hawaii 96817

Dear Dr. Hebshi:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 C.F.R. § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address comments regarding the above-referenced submittal:

General Comments

Your comments regarding an extension to the University of Hawaii at Manoa and also comments regarding bicycles have been noted. As detailed in Section 1.1.2 of the Draft EIS, and as approved by the City Council with Resolution 07-039, the Project extends from East Kapolei to Ala Moana Center. The Project has logical termini at East Kapolei and Ala Moana Center and independent utility from any extensions that may be constructed in the future. The proposed future extensions to West Kapolei, Salt Lake Boulevard, Waikiki, and UH Manoa are

discussed in the cumulative impacts sections of Chapters 3 and 4 of this Final EIS. The future extensions are not part of this Project, thus they are not required to be evaluated under Chapter 343 of the Hawai'i Revised Statues and the National Environmental Policy Act (NEPA). Under NEPA, environmental analysis is only required when there is a proposed action by a Federal agency. Here, because the future extensions are not proposed for implementation at this time, they are not part of the Project studied in this Final EIS. It would be premature to undertake an environmental analysis of the extensions (beyond the cumulative impacts analysis) because they are not part of the proposed action to be taken by the City and FTA. If the future extensions are proposed for implementation in the future, environmental analysis of the extensions and appropriate alternatives will be undertaken at that time. UH Manoa will be connected by enhanced bus service until the future extension is built. The Project would coordinate with the University of Hawaii regarding future extensions.

Specific Comments

Page 2-20: Bicycles will also be allowed on trains, as regulated by a bicycle policy. This policy will be determined at a later time prior to the opening of the fixed guideway system.

Page 2-24: Bicycle racks will be available at each transit rail station. There will also be security at stations and in the areas around stations.

Page 3-23: Your comment is noted. The mode shares shown in Table 3-13 are islandwide. Mode share changes will be different in the corridor and during peak travel periods. As shown in Figure 3-11 in the Final EIS, transit mode share will be much higher during the a.m. two-hour peak period with the Project compared to No Build conditions.

Page 3-34: No studies related to your question have been undertaken. However, the usual thresholds for walking to rail transit stations like the ones proposed for Honolulu is ½ mile in distance or 10 minutes in time. For bicycles, the distance thresholds would be longer.

Page 3-43: The Airport Alternative has been selected for the Project instead of the Salt Lake Alternative. As a result, the bicycle lanes along Salt Lake Boulevard will not be affected by the Project.

Regarding your other question on Page 3-43, the guideway generally runs along a median in the center of roadways such as Dillingham Boulevard, Kamehameha Highway or Farrington Highway. Where a median does not already exist, the Project will create a median just wide enough to accommodate the guideway columns by relocating travel lanes slightly. There is generally insufficient room beneath the guideway for a continuous bikeway at street level. Also, the guideway structure itself is designed to minimize visual impact and overall cost by being as short and compact as possible. As a result, there are no plans to provide a bike path within the structure of the guideway.

Page 3-48 and 3-50: Your appreciation of our mitigation efforts has been noted.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Issuance of the Record of Decision under NEPA and acceptance of the Final EIS by the Governor of the State of Hawaii are the next anticipated actions and will conclude the environmental review process for this Project.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

298705

February 4, 2009

TO **Director Yoshioka, Ted Matley, Governor Lingle, and Members of the City Council**

RE **Opposition to Honolulu Rail Project Due to Challenges Unresolved by EIS**

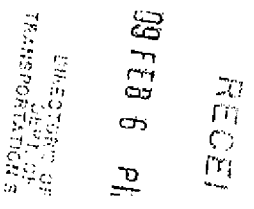
This communication is submitted in response to the EIS and offers commentary on the adverse effects the proposed rail system will have on Oahu and particularly downtown Honolulu and the City's shoreline.

There are so many factors that deserve comment, factors that justify returning to the drawing board and advancing a traffic plan that can succeed rather than one that is doomed to fail. I have gone to countless public meetings and hearings on this project. I have studied the impacts of rail and the relative advantages/disadvantages to cost of these various cities. I am not impressed that we can justify the extensive negatives and high costs by any benefits that might result for a small portion of the population who would ride the train. I am a social science researcher with a Ph.D. and am a faculty member and the leader of planning in a local university. My investigation into this problem, the proposed solution, and the inadequacy of the draft EIS make me conclude that this is still a project that should not be carried forward. We should, at the very least, get more answers than we have now -- before any further steps are taken. I will cite 3 concerns as major problem areas not resolved by the EIS.

1. Deception, Misinformation and Misuse of Taxpayer Funds Create Adverse Economic and Social Consequences – One set of severe adverse consequence of this doomed project is the loss of public trust in government, the questionable investment in the front-loading of publicity for the project, and the long term economic losses we will experience when the project goes into overruns of time and resources. A large portion of the public has lost faith in the ability of the government to engage in an objective analysis of a problem and solution. We have seen way too much money spent on the initial consultation. We have seen our tax money spent on biased and nasty advertising and public relations. And we have seen a commitment carried forward even now in a time of recession, as if there was no economic crisis in our land and we should still seek ***the most expensive transit system for the shortest distance and the smallest number of people.***

The EIS has not properly addressed the social and economic impacts of the proposal and project to date, nor does it explain why this huge report came out only 4 days before the election and the vote that supposedly showed "support" for the project. People have been frightened into thinking there are no choices and they had ***inadequate time to consult the draft EIS to form their own opinions.***

2. Creation of a True "Blight" on the Oahu Landscape and Shoreline Viewplanes Without an Equivalently Powerful Public Benefit – There has been little consideration given to the disastrous effect of this proposed project on the viewplanes of Oahu and the especially adverse effects on the Downtown to Ala Moana areas and the shoreline views. The EIS does not properly address this in the sense of defining advantages that would outweigh the drastic disadvantages. Add to that the lack of answers to many questions about details of the project. For example, how do we assess the impact at Ala Moana Center if we don't have elevations and instead of hearsay and stories. We are told that even if it is ten stories the 100 feet will be at the top not the bottom, so not to worry. I was told this by a city official at a public hearing.



This is merely an example. There are countless unanswered questions about claims for benefits, costs, impacts on existing transportation (The Bus) and so on. The EIS has not resolved questions about false claims, such as presenting statistics claiming benefit but still falling far short of the problem. There is inadequate exploration of the arguments that have emphasized advantages and positives without explaining the larger negatives within which only relative small benefits may be created --- at *massive* costs to a State now is very serious decline economically. *No one would urge an average person whose income was reduced by the recession to go ahead anyway and buy an expensive yacht because it might offer an alternative way to travel from Ewa to Pier 1!*

3. Unresolved Questions about the Proposed Technology – Given the inadequacy, deceptive communications, and unanswered questions about the choice of fixed rail, it is hard to believe that the rail advocates are continuing to press forward. Many alternatives were essentially dismissed, even though they were listed to give the (false) appearance that they were given serious consideration. The EIS does not resolve the many questions that many citizens still raise about the need for elevated rail, for steel on steel, and equipment not made in the US. Add to that the problems with construction here in Hawai'i and lack of people experienced in the methods to be used. In the meantime, ground-level alternatives that would have the advantage of being "on the ground" have not been given sufficient attention and consideration.

In summary, the EIS fails to answer many important questions, fails to sufficiently well address the adverse social and economic impacts on Hawai'i and fails to provide a basis for resolving the enormously adverse effects on the "look" of Hawai'i and the view planes of so many who live here every day and will have to look at those dreadful elevated tracks and cars moving right through a person's attempt to look out at the horizon as they did in years past. No more horizon. No more skyline.

This is a deeply disappointing and disturbing move by a few people who have been exposed as intending to benefit certain businesses and developers. Shame shame on the government officials who have advanced a plan that so clearly means disadvantages that vastly outweigh very small supposed gains.

Respectfully Submitted, Nancy Hedlund

Nancy Hedlund, Ph.D.
930 Kaheka St. #3601, Honolulu HI 96814
Honolulu, Hawai'i
Member, Ala Moana/Kaka'ako Neighborhood Board (#11)
Member, HCDA's Kaka'ako Makai Community Planning Advisory Council

TO: Wayne Yoshioka, Director
Department of Transportation Services
City and County of Honolulu
650 S. King St. 3rd Floor
Honolulu, HI 96813
(copy) Ted Matley FTA Region IX 201 Mission St. Suite 1650 San Francisco, CA 94105
(copy) Governor Linda Lingle Hawaii State Capitol 415 S. Beretania St. 5th Floor Honolulu, HI 96813
(copy) Honolulu City Council Members

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WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010 RT10/09-336351

Ms. Nancy Hedlund
930 Kaheka Street, #3601
Honolulu, Hawaii 96814

Dear Ms. Hedlund:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

Your comments will be answered in the same manner as submitted.

1. Guidelines set forth by NEPA, and Chapter 343 of the Hawaii Revised Statutes stipulate that public involvement be carried out on large-scale projects such as the rail project. As one of the largest infrastructure projects ever to be constructed on Oahu, the City believed that it was important to disseminate information to as many people as possible. Thus, a broad range of print and visual media was employed to reach multiple population segments. Project funds paid for the public involvement activities listed in Chapter 8 of the Final EIS.

As discussed in Chapter 7 of the Final EIS, the cost-effectiveness analysis considers whether the Project's benefit will justify its capital and operating costs. Cost-effectiveness is one of the key criteria that FTA uses to evaluate projects proposed for Section 5309 New Starts funding. The cost-effectiveness indices for the Project are within the "medium" range established by FTA for its New Starts ratings which, along with other considerations, is currently required to qualify for New Starts funding.

The primary sources of capital for the Project are the General Excise and Use Tax (GET) surcharge revenues. These sources will fund more than 70 percent of the cost of the Project. The remainder of project funding will be from Federal transit sources, primarily from the Section 5309 New Starts program, supplemented as necessary by formula Section 5307 funds.

The fixed guideway system is designed to serve major destinations in the most heavily travelled corridor on Oahu, plus the area with the greatest expected growth. In 2000, 63 percent of Oahu's population and 80 percent of its jobs were located within the study corridor. By 2030, these distributions will increase to 69 percent of the population and 83 percent of the employment.

Social and economic impacts of the Project are discussed in Chapter 4 of the Final EIS. The NEPA process, including publication of the Draft EIS, was started in 2007. When in the summer of 2008, the City Council decided to place the measure on the ballot, the schedule for the Draft EIS had been long established. Various design, agency coordination, and approval steps were required prior to publication of the Draft EIS. For this project, the normal distribution schedule was accelerated by FTA and the City to ensure availability of the information prior to the general election.

2. The assessment of visual effect due to the Project as described in Section 4.8.3 of the Final EIS considers changes to the visual landscape and viewer responses to those changes. This includes the existing development along the Project alignment. Within the Project corridor the environment changes from rural at the Waiʻanae end of the corridor to dense high-rise development at the Koko Head end.

As part of the design process, the City has developed design principles, which are identified in the Honolulu High-Capacity Transit Corridor Project Compendium of Design Criteria (RTD 2009m) that will be implemented in final design to minimize visual effects of the Project. For example, guideway materials and surface textures will be selected in accordance with generally accepted architectural principles to achieve effective integration between the guideway and its surrounding environment. Landscape and streetscape improvements will mitigate potential visual impacts, primarily for street-level views.

Other measures to address visual impacts of the Project are being developed through the station design and planning process. The initial station area plans and design guidelines were first developed with coordination between DTS and the Department of Planning and Permitting (DPP). The next level of transit station design focuses on integrating individual neighborhood characteristics of the communities served by the

stations.

The following mitigation framework will be included in the Project to minimize negative visual effects and enhance the visual and aesthetic opportunities that it creates:

- *Develop and apply design guidelines that will establish a consistent design framework for the Project with consideration of local context.*
- *Coordinate the project design with City TOD planning and DPP.*
- *Consult with the communities surrounding each station for input on station design elements.*
- *Consider specific sites for landscaping and trees during the final design phase when plans for new plantings will be prepared by a landscape architect. Landscape and streetscape improvements will serve to mitigate potential visual impacts.*

Section 4.8.3 of the Final EIS, Design Principles and Mitigation includes information related to the mitigation framework described above. Specifically architecture and landscape design criteria include guidelines regarding site design, materials and finishes, and lighting, which apply to stations, station areas, and the guideway.

The Ala Moana Center Station, at the end of the project, will be located at about the 40-foot level just Koko Head of Kona Iki Street. The station and the guideway will be between Ala Moana Center and mid- to high-rise buildings and will not substantially change the view from adjacent offices and residences.

3. The Alternatives Analysis phase evaluated a range of transit mode and general alignment alternatives in terms of their costs, benefits, and impacts. An initial screening process considered alternatives identified through previous transit studies, a field review of the study corridor, an analysis of current population and employment data for the study corridor, a literature review of technology modes, work completed for the Oahu Regional Transportation Plan 2030 *(ORTP) prepared by the Oahu Metropolitan Planning Organization (OahuMPO) (OahuMPO 2007), and public and agency comments received during the formal Alternatives Analysis scoping process.*

During the fall of 2005 and winter of 2006, the City and County of Honolulu completed the alternatives screening process that is documented in the Honolulu High-Capacity Transit Corridor Project Alternatives Screening Memorandum *(DTS 2006a). Scoping meetings were held, which included a presentation of alternatives to the public and interested agencies and officials to receive comments on the Purpose and Need, alternatives, and scope of the analysis for the Alternatives Analysis. Refinements were made to the alternatives. In total, 75 fixed guideway alignment options were screened.*

The following alternatives were studied in the Alternatives Analysis: No Build Alternative, Transportation System Management (TSM) Alternative, Managed Lane Alternative, and the Fixed Guideway Alternative. After review of the Alternatives Analysis Report and consideration of public comments, the City Council selected a fixed guideway transit system extending from Kapolei to UH Manoa with a connection to Waikiki as the

Locally Preferred Alternative. The selection, which eliminated the TSM and Managed Lane Alternatives, became Ordinance 07-001 on January 6, 2007.

The Purpose and Need of the Project is discussed in Sections 1.7 and 1.8 of the Final EIS. The purpose of the Project is to provide high-capacity rapid transit in the highly congested east-west transportation corridor between Kapolei and UH Manoa, as specified in the ORTP. The Project is intended to provide faster, more reliable public transportation service in the study corridor than can be achieved with buses operating in congested mixed-flow traffic, to provide reliable mobility in areas of the study corridor where people of limited income and an aging population live, and to serve rapidly developing areas of the study corridor. The Project also will provide additional transit capacity, an alternative to private automobile travel, and improve transit links within the study corridor.

As stated in Section 2.2.3 of this Final EIS, the NEPA Notice of Intent requested input on five transit technologies. A technical review process included the opportunity for public comment and was used in parallel with the alternatives analysis to select a transit technology. The process included a broad request for information that was publicized to the transit industry. Transit vehicle manufacturers submitted 12 responses covering all of the technologies listed in the Notice of Intent. An independent five-member technology panel composed of four transit experts and a transportation academic appointed by the City Council evaluated guided rubber-tire-on-concrete systems (e.g., Phileas bus system and VAL-type systems), monorail (which is a variation on rubber-tyred technology), steel-wheel-on-steel-rail systems, (e.g., light rail and rapid rail), and magnetic levitation (MAGLEV) . The panel considered the performance, cost, and reliability of the proposed technologies.

Proprietary technologies, meaning those technologies that would have required all future purchases of vehicles or equipment to be from a single manufacturer, were eliminated because none of the proprietary technologies offered substantial proven performance, cost, and reliability benefits compared to steel wheel operating on steel rail.

The panel accepted public comment twice as part of its review. By a four-to-one vote, the panel chose a steel wheel vehicle operating on steel rail system because it was considered safe, reliable, economical, and non-proprietary. Those results are documented in the panel's report to the City Council dated February 22, 2008 entitled "Independent Technology Selection Panel Report".

Construction activities for the majority of the transit system are similar to roadway and building construction. Appendix E of the Final EIS details construction methods that are widely used for both rail transit and elevated highway construction and were employed on the H-3 Freeway. Experienced labor is locally available. A limited number of specialists will be needed to work with locally available labor in certain areas, such as transit power and signaling specialists working with local electricians to install system equipment.

The Alternatives Screening Memorandum (DTS 2006a) recognized the visually sensitive areas in Kakaako and Downtown Honolulu, including the Chinatown, Hawaii Capital, and Thomas Square/Honolulu Academy of Arts Special District. To minimize impacts on historic resources, visual aesthetics, and surface traffic, the screening process considered 15 combinations of tunnel, at-grade, or elevated alignments between Iwilei and Ward Avenue. Five different alignments through Downtown Honolulu were advanced for further analysis in the Alternatives Analysis, including an at-grade portion along Hotel Street, a tunnel under King Street, and elevated guideways along Nimitz Highway and Queen Street (Figure 2-4).

The Alternatives Analysis Report (DTS 2006b) evaluated the alignment alternatives based on transportation and overall benefits, environmental and social impacts, and cost considerations. The report found that an at-grade alignment along Hotel Street would require the acquisition of more parcels and could potentially affect more burial sites than any of the other alternatives considered. The alignment with at-grade operation Downtown and a tunnel under King Street, was not selected because of the environmental effects, such as impacts to cultural resources, reduction of street capacity, and property acquisition requirements of the at-grade and tunnel sections, which would cost an additional $300 million.

The Project's purpose is "to provide high-capacity rapid transit" in the congested east-west travel corridor (see Section 1.7 of the Final EIS). The need for the Project includes improving corridor transit mobility and reliability. The at-grade alignment would not meet the Project's Purpose and Need because it could not satisfy the mobility and reliability objectives of the Project (see bullets below). Some of the technical considerations associated with an at-grade versus elevated alignment through Downtown Honolulu include the following:

- ***System Capacity, Speed, and Reliability**—The short, 200-foot (or less) blocks in Downtown Honolulu would permanently limit the system to two-car trains to prevent stopped trains from blocking vehicular traffic on cross-streets. Under ideal operational circumstances, the capacity of an at-grade system could reach 4,000 passengers per hour per direction, assuming optimistic five minute headways. Based on travel forecasts, the Project should support approximately 8,000 passengers in the peak hour by 2030. Moreover, the Project can be readily expanded to carry over 25,000 in each direction by reducing the interval between trains (headway) to 90 seconds during the peak period. To reach a comparable system capacity, speed, and reliability, an at-grade alignment would require a fenced, segregated right-of-way that would eliminate all obstacles to the train's passage, such as vehicular, pedestrian, or bicycle crossings. Even with transit signal priority, the at-grade speeds would be slower and less reliable than an elevated guideway. An at-grade system would travel at slower speeds due to the shorter blocks, tight and short radius curves in places within the constrained and congested Downtown street network, the need to obey traffic regulations (e.g., traffic signals), and potential conflicts with other at-grade activity, including cars, bicyclists, and pedestrians. These effects mean longer travel times and far less reliability than a fully grade-separated system. None of these factors affects an*

elevated rail system. The elevated rail can travel at its own speed any time of the day regardless of weather, traffic, or the need to let cross traffic proceed at intersections.

- ***Mixed-Traffic Conflicts***— *The Project will run at three minute headways. However, three-minute headways with an at-grade system would prevent effective coordination of traffic signals in the delicately balanced signal network in downtown Honolulu. A disruption of traffic signal cycle coordination every three minutes would severely affect traffic flow and capacity of cross-streets. Furthermore, there would be no option to increase the capacity of the at-grade rail system by reducing the headway to 90 seconds, which would only exacerbate the signalization problem. An at-grade system would require removal of two or more existing traffic lanes on affected streets. This effect is significant and would exacerbate congestion. Congestion would not be isolated to the streets that cross the at-grade alignment but, instead, would spread throughout Downtown. The Final EIS shows that the Project's impact on traffic will be isolated and minimal with the elevated rail, and, in fact will reduce system-wide traffic delay by 18 percent compared to the No Build Alternative (Table 3-14 in the Final EIS). The elevated guideway will require no removal of existing through travel lanes, while providing a reliable travel alternative. When traffic slows, or even stops due to congestion or incidents, the elevated rail transit will continue to operate without delay or interruption.*

  An at-grade light rail system with continuous tracks in-street would create major impediments to turning movements, many of which would have to be closed to eliminate a crash hazard. Even where turning movements are designed to be accommodated, at-grade systems experience potential collision problems. In addition, mixing at-grade fixed guideway vehicles with cars, bicyclists, and pedestrians presents a much higher potential for conflicts compared to grade-separated conditions. Where pedestrian and automobiles cross the tracks in the street network, particularly in areas of high activity (e.g., station areas or intersections), there is a risk of collisions involving trains that does not exist with an elevated system. There is evidence of crashes between trains and cars and trains and pedestrians on other at-grade systems throughout the country (e.g., Phoenix, Houston, LA). This potential would be high in the Chinatown and Downtown neighborhoods, where the number of pedestrians is high and the aging population presents a particular risk.

- ***Construction Impacts***—*Constructing an at-grade rail system could have more effects than an elevated system in a number of ways. The wider and continuous footprint of an at-grade rail system compared to an elevated rail system (which touches the ground only at discrete column foundations, power substations, and station accessways) increases the potential of utility conflicts and impacts to sensitive cultural resources. In addition, the extra roadway lanes utilized by an at-grade system would result in increased congestion or require that additional businesses or homes be taken to widen the roadway through Downtown. Additionally, the duration of short-term construction impacts to the community and*

environment with an at-grade system would be considerably greater than with an elevated system. Because of differing construction techniques, more lanes would need to be continuously closed for at-grade construction and the closures would last longer than with elevated construction. This would result in a greater disruption to business and residential access, prolonged exposure to construction noise, and traffic impacts.

Because it is not feasible for an at-grade system through Downtown to move passengers rapidly and reliably without significant detrimental effects on other transportation system elements (e.g., the highway and pedestrian systems, safety, reliability, etc.), an at-grade system would have a negative system-wide impact that would reduce ridership throughout the system. The at-grade system would not meet the Project's Purpose and Need and, therefore, does not require further analysis.

As discussed previously, the island's unique visual character and scenic beauty were considered in the visual and aesthetic analysis presented in Section 4.8 of the Final EIS. Social and economic impacts are discussed in Chapter 4 of the Final EIS.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
Creation Date :	12/10/2008
Creator Affiliation :	
First Name :	Buzz
Last Name :	Hong
Business/Organization :	HI Building & Construction Trades
Address :	560 N. Nimitz Highway, #50
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Telephone Extension :	
Add to Mailing List :	Both
Submission Method :	Website
Other Submission Method :	
Submission Date :	12/10/2008

Submission Content/Notes : December 9, 2008

Department of Transportation Services
City & County of Honolulu
650 South King Street, 3rd Floor
Honolulu, Hawaii 96813

RE: IN SUPPORT OF DRAFT EIS
HONOLULU HIGH-CAPACITY CORRIDOR PROJECT
Public Hearings: December 9th – 11th, 2009

Dear Department of Transportation Services:

For the record my name is Buzz Hong, the Executive Director for the Hawaii Building & Construction Trades Council, AFL-CIO. Our Council is comprised of 16-construction unions and a membership of 26,000 statewide.

The Council supports the Draft EIS for the Honolulu High-Capacity Corridor Project, which as part of an integrated mass transit system, is an investment in Oahu's future – growing our economy, protecting our environment, strengthening our communities, and providing reliable and affordable transportation for generations to come.

Thank you for the consideration of our request.

Sincerely,

William "Buzz" Hong

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, 3RD FLOOR
HONOLULU, HAWAII 96813
Phone: (808) 768-8305 • Fax: (808) 768-4730 • Internet: www.honolulu.gov

MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

February 16, 2010

RT9/09-331591
RT12/08-291105R

Mr. William "Buzz" Hong
Executive Director
Hawaii Building & Construction Trades
Council, AFL-CIO
Gentry Pacific Design Center, Suite 215A
560 North Nimitz Highway, #50
Honolulu, Hawaii 96817

Dear Mr. Hong:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall indentify the Preferred Alternative (23 C.F.R. § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraph addresses comments regarding the above-referenced submittal:

Your preference for a Fixed Guideway Transit Alternative has been noted. While each of the alternatives includes trade-offs between benefits and impacts, the Airport Alternative from East Kapolei to Ala Moana Center has been selected as the Preferred Alternative. The identification of the Airport Alternative as the Preferred Alternative was made by the City to comply with FTA's NEPA regulations that state that the Final EIS should focus on the Preferred Alternative (23 C.F.R. § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative, public input on the Draft EIS, and City Council Resolution 08-261 identifying the

Airport Alternative as the Project. The selection of the Airport Alternative is described in Chapter 2 of this Final EIS. The discussion of the alternatives considered is included in Chapter 2 of this Final EIS and the Alternatives Analysis.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Issuance of the Record of Decision under NEPA and acceptance of the Final EIS by the Governor of the State of Hawaii are the next anticipated actions and will conclude the environmental review process for this Project.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
Creation Date :	12/3/2008
Creator Affiliation :	
First Name :	Roy
Last Name :	Higashide
Business/Organization :	
Address :	1302 Victoria St.
Alternative Preference :	
Apt./Suite No. :	218
City :	Honolulu
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Zip Code :	96814
Email :	higashideroy@yahoo.com
Telephone :	808-853-8441
Telephone Extension :	
Add to Mailing List :	Both
Submission Method :	Website
Other Submission Method :	
Submission Date :	12/03/2008
Submission Content/Notes :	With the economy as it is and projected to be, couldn't you make it like how they quickly rebuilt after those California earthquakes and have as many qualified construction companies build sections with both incentives and penalties for speed and quality construction? Also because of the times, what kind of security will be there on the trains as well as around the stations? Thanks Roy

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-331004

Mr. Roy Higashide
1302 Victoria Street
Apartment 218
Honolulu, Hawaii 96814

Dear Mr. Higashide:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall indentify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

Much of the California earthquake repair work was completed under emergency provisions and exempt from the standard project development process. The Project on Oahu is regulated by both State and Federal laws that govern its development.

As discussed in the Final EIS Section 2.5.4 Safety and Security Measures, a project-specific Safety and Security Management Plan has been developed in accordance with FTA requirements to define the safety and security activities and methods for identifying, evaluating, and resolving potential safety hazards and security vulnerabilities of the system. It establishes responsibility and accountability for safety and security during the Preliminary Engineering, Final Design, construction, testing, and start-up phases of the Project. The Honolulu Police Department, the Honolulu Fire Department, the Honolulu Department of Emergency Management, and the Honolulu Emergency Services Department have been involved in

preparing and will be part of implementing the plan. The plan addresses public safety and security concerns, including threats and hazards associated with the Project, specific issues that were identified through community outreach efforts, and design and architectural details to enhance safety.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Honolulu High-Capacity Transit Corridor Project

Welcome to the Honolulu High-Capacity Transit Corridor Project's Public Hearing for the Draft Environmental Impact Statement/Section 4(f) Evaluation.

This public meeting and hearing has been designed to inform the public about the transit project, explain materials contained in the Draft EIS, answer questions from the public, and collect public input on project issues related to the Draft EIS, Section 106 of the National Historic Preservation Act, Section 4(f) of the U.S. Department of Transportation Act, and floodplains affected by the project.

Please review the project information and ask project staff any questions about the project that you might have. The Draft EIS is available on the project website at www.honolulutransit.org.

You may provide official comments in several ways. Here at this Public Hearing you may provide oral comments to a court reporter who will record them for the record or use this form to provide written comments. After the meeting, you may provide an on-line comment at www.honolulutransit.org or use this form to send a written comment to the Department of Transportation Services. All comments must be postmarked or received by January 7, 2009 in order for them to be included in the Final EIS.

Name: Lennette Hinton

Address: 860 Halekauwila St
Honolulu HI
96813

Phone:

E-mail:

Comment(s):

DO NOT LIKE THE RAIL STATION IN FRONT OF 860 Halekauwila St. Very unsightly! Very unhappy with current plans... Waianae needs rail more than Halekauwila No rail on Halekauwila - Sorry!

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-331986

Ms. Lennette Hinton
860 Halekauwila Street
Honolulu, Hawaii 96813

Dear Ms. Hinton:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall indentify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraph addresses your comments regarding the above-referenced submittal:

Your opposition to the station located on Halekauwila Street is noted. A broad range of alignments through Downtown and Kakaako were evaluated in the Alternatives Analysis. Physical limitations prevent the use of many streets, such as the Federal Building blocking Pohukaina Street. Other streets, such as King Street, are farther from where people live and want to travel to, resulting in fewer users of the system. While there will be adverse effects from the Halekauwila Street alignment, overall they are less than would be experienced with other possible alignments.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this

letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

24/20,

HISTORIC HAWAI'I FOUNDATION

December 10, 2008

Mr. Wayne Yoshioka, Director
Department of Transportation Services
City and County of Honolulu
650 South King Street
Honolulu, Hawai'i 96813

RE: Honolulu High-Capacity Transit Corridor Project,
Review of Draft Environmental Impact Statement (EIS)/Section 4(f) evaluation

Dear Mr. Yoshioka:

Thank you for referring the above-mentioned project to Historic Hawai'i Foundation (HHF) for review and comment under the National Environmental Policy Act (NEPA) and Section 4(f) of the Department of Transportation Act, 49 USC §303. HHF previously reviewed and provided comments on the Historic Resources Technical Report (September 15, 2008) as a consulting party to the review process under Section 106 of the National Historic Preservation Act (NHPA), pursuant to 36 CFS §800.2.(c)(5) and 800.3(f)(3).

HHF also notes that the Department of Transportation Services has provided notice that it intends to use the process and documentation prepared under NEPA in order to comply with its NHPA Section 106 obligations. HHF shares the concerns raised by the National Trust for Historic Preservation in its letter of Oct. 3, 2008 about combining the two processes. We look forward to the response from the federal agencies and Advisory Council on Historic Preservation to address the propriety of this proposal and the circumstances under which it would be appropriate.

The proposed Honolulu Transit Corridor project will have a dramatic impact on the landscape of the island of O'ahu; this includes not only the direct impact to specific parcels, but primarily the visual effect on the landscape and historic resources. HHF is concerned that the Draft EIS does not accurately take into account these larger impacts, but rather focuses on those adverse effects caused by the direct taking of land.

As indicated in 36 CFR 800.16(i), effect means "alteration to the characteristics of a historic property qualifying it for inclusion in or eligibility for the National Register." The following activities constitute an adverse effect: physical destruction of or damage to all or part of the resource; alteration of a resource, including restoration, rehabilitation, repair, maintenance, stabilization, hazardous material remediation, and provision of handicapped access, that is not consistent with the Secretary of Interior's standards for the treatment of historic properties; removal of the resource from its historic location; change of the character of the resources' use or of physical features within the setting that contribute to its historic significance; introduction of visual, atmospheric, or audible elements that diminish the integrity of the property's significant historic feature; or neglect of a property that causes its deterioration, except where such neglect and

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Email preservation@historichawaii.org / Web www.historichawaii.org

deterioration are recognized qualities of a property of religious and cultural significance (emphasis added).

Table 4-32 of the draft EIS lists properties preliminarily determined eligible for listing on the National Register of Historic Places. Of these, only seven individual structures were determined to be adversely effected by the proposed project. This assessment is unacceptable, as in a large number of cases the "introduction of visual, atmospheric, or audible elements that diminish the integrity of the property's significant historic features" will occur. It is crucial that these impacts are recognized and properly mitigated.

For many of those properties for which it was determined that there will be "no effect" or "no adverse effect," Table 4-32 indicates the description of the effect as "no property acquisition." This determination is in error. The mere fact that either no property acquisition or only a minor acquisition occurs does not mean that there is "no effect" or "no adverse effect." The dramatic visual change and impact to view sheds caused by the presence of the guideway and rail stations does in fact constitute an adverse effect.

It is vital that direct, indirect and cumulative impacts to districts, bridges, view planes, and individual structures as a result of the presence of the guideway and rail stations are acknowledged and properly identified as adverse effects. Table 4-10 acknowledges that visual impacts exist; it needs to be further acknowledged that, where historic resources are present, these impacts likely constitute an adverse effect.

HHF also has serious concerns regarding the evaluation of Pearl Harbor as historic resource. Page 4-59 discusses visually sensitive resources. The paragraph discussing landmarks should differentiate designated National Historic Landmarks (NHL)—which are of extreme importance to our nation's history—from visual landmarks such as parks and open space. The draft EIS does not do so, thus downplaying the significance of the Pearl Harbor NHL. The sentence of greatest concern reads, "Pearl Harbor is considered a historical landmark because of the part it played in the island's history." This is an egregious understatement regarding Pearl Harbor, the bombing of which brought the United States into World War II. It has great significance both to the Nation and to the world for its extreme importance that reaches far beyond its history at a state level. The fact that Pearl Harbor is a designated NHL of great importance to the nation should be clearly stated in the draft EIS.

The visual effects to each area that the transit line will pass through are evaluated in Table 4-10. For the Pearl Harbor segment, the Draft EIS indicates that the visual impact will be moderate, but states that "the guideway would dominate the linear view corridor above the highway. However, Kamehameha Highway is a major transportation corridor and visual effects would not be substantial." While Kamehameha Highway is a substantial roadway, its impact is nowhere near that of a 60-foot high guideway. Thus, the impact to historic view planes and the character of the National Historic Landmark (NHL) will be high.

We have additional concerns about the assessment of some of the other visual impacts of the project, especially in the Chinatown areas, where in some cases the impact is only listed as moderate. For the view from Maunakea Street looking ma kai, for example, the draft EIS indicates that the

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existing visual quality is high and that the impact would be moderate, even though the assessment of the impact reads: "the guideway and columns would be prominent features in the ma kai views of Honolulu Harbor, partially blocking views of the sky." The EIS should acknowledge the high level of impact, especially given the fact that Chinatown is both listed on the National Register of Historic Places and is designated by the City and County of Honolulu as a Special Design District.

The Honolulu special design district guidelines indicate that there are certain view planes from Chinatown to Honolulu Harbor that are significant and should be preserved. One of the objectives of the district is "to retain ma kai view corridors as a means of retaining the historic link between Chinatown and the harbor." In addition to the visual impact that the transit line will have on the district, it will also impact this historic visual link. For both of these reasons, the project constitutes an adverse effect on the Chinatown District.

In regards to former Naval Air Station Barber's Point, previous documentation in the Historic Resources Technical Report indicated that resources at this site were determined eligible for listing on the National Register. However, these resources have not been included in Table 4-32 listing the historic properties within the Area of Potential Effect (APE). HHF deferred to the State Historic Preservation Division (SHPD) on determinations of eligibility. Please provide an explanation for the changed circumstances that led to a different determination of eligibility for these resources.

The State Historic Preservation Division's letter of September 26, 2008 stated that additional consideration should be given to resources at former Marine Corps Air Station 'Ewa Field. This was not done in this draft EIS. Five sites at Pearl Harbor were recently designated by President Bush as part of the Valor in the Pacific National Monument. Though not officially part of the monument, Barbers Point (Kalaeloa), which was also attacked on December 7, 1941, was one of twelve sites nationwide that received official recognition for its importance of telling the story of World War II in the Pacific. Given its extreme importance and proximity to the transit line, it should be further evaluated.

In previous correspondence, HHF suggested potential measures to mitigate impacts to historic resources from this undertaking. A commitment to providing the mitigation measures, including timelines and responsible parties, needs to be complete as part of the final EIS and made part of the Record of Decision, in addition to any Section 106 documentation.

Since 1974, Historic Hawai'i Foundation has been a statewide leader for historic preservation. A non-profit, membership-based organization, HHF's mission is to preserve and encourage the preservation of Hawai'i's historic buildings, sites, objects and communities.

Thank you for the opportunity to comment. We look forward to the opportunity to discuss the proposed project, the impacts to historic resources and appropriate mitigation efforts.

Very truly yours,

Kiersten Faulkner

Kiersten Faulkner, AICP
Executive Director

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HISTORIC HAWAI'I FOUNDATION

Copies (via email)
Laura Thielen, State Historic Preservation Officer/Chair, DLNR
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DEPARTMENT OF TRANSPORTATION SERVICES

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June 11, 2010

RT12/08-291201R

Ms. Kiersten Faulkner, Executive Director
Historic Hawaii Foundation
680 Iwilei Road, Suite 690
Honolulu, Hawaii 96817

Dear Ms. Faulkner:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address comments regarding the above-referenced submittal:

The City appreciates the continued interest and participation of the Historic Hawaii Foundation throughout the Section 106 process, including previous input to the eligibility and effects determinations and consultation throughout the development of the Section 106 Programmatic Agreement. The Programmatic Agreement is included as Appendix H to the Final EIS. Previous comments by the Historic Hawaii Foundation and other consulting parties regarding combining Section 106 with the NEPA process as permitted in 36 CFR Chapter 800.8(c) were considered and addressed at the time. No party provided a substantive reason why the project should not be merged. Per the notification to the State Historic Preservation Division of the use of 36 CFR Chapter 800.8(c), comments received on the Draft EIS were also considered as comments on the Section 106 process. This is an accepted process to provide

better integration of historic preservation and environmental policy review and reduce redundancy of public involvement activities.

Based on concerns raised by Section 106 consulting parties, including Historic Hawaii Foundation, preliminary effects determinations as shown in the Draft EIS were reevaluated as part of intensive-level assessments and documented in the Honolulu High-Capacity Transit Corridor Project Historic Effects Report (April 2009) issued by FTA on April 14, 2009. Both direct and indirect effects to historic properties were reconsidered in this report. These include, as appropriate under effects criteria, the visual effects on historic properties and landscapes. Following consultation, which included participation of Historic Hawaii Foundation, the State Historic Preservation Division (SHPD) concurred with all 22 adverse effect determinations and also provided comment that project impacts be considered as adverse effect to 11 additional resources. The Project accepted these recommendations. These determinations of effect are documented in Section 4.16 and Appendix H of the Final EIS. Chinatown and U.S. Naval Base, Pearl Harbor National Historic Landmark are among the resources to receive an adverse effect determination. The Historic Effects Report is available on the project website (www.honolulutransit.org) and from the Department of Transportation Services.

Table 4-32 in the Draft EIS corresponds with Table 4-34, Historic Properties within Project's Area of Potential Effect, in the Final EIS. In the Final EIS, this table presents the determination of effect and a brief description of the effect. The determination of effect was made with consideration of input from the consulting parties and concurrence by SHPD. More detailed descriptions of the properties and the effects determination is presented in the Honolulu High-Capacity Transit Corridor Project Historic Effects Report (April 2009).

After a collaborative re-evaluation of historic properties and potential impacts presented in the Draft EIS, consulting parties, including historic, Native Hawaiian and federal interests participated in 11 meetings as part of the development of the Programmatic Agreement that describes measures taken to avoid, minimize, and mitigate historic properties. Historic Hawaii Foundation was involved in the development of this agreement. The Programmatic Agreement is included in Appendix H, and a summary of these measures has been included in Section 4.16.3 in this Final EIS.

As currently conceived, the Project will not extend to Ewa Field or Barber's Point, therefore those sites do not require further analysis. In the case that a future extension would be located within proximity to these historic resources, a full evaluation would be completed at that time.

The final Project alignment, as configured in the Final EIS has logical termini at East Kapolei and Ala Moana Center and independent utility from any extensions that may be constructed in the future. Potential future extensions to West Kapolei, Salt Lake Boulevard, Waikiki, and UH Manoa are discussed in the cumulative impacts sections of Chapters 3 and 4 of the Final EIS. However, the future extensions are not part of this Project; thus, they are not required to be evaluated under Chapter 343 of the Hawaii Revised Statutes and NEPA. Under NEPA, environmental analysis is only required when there is a proposed action by a Federal agency. Here, because the future extensions are not proposed for implementation at this time, they are not part of the Project studied in the Final EIS. It would be premature to undertake an

environmental analysis of the extensions (beyond the cumulative impacts analysis) because they are not part of the proposed action to be taken by the City and FTA. If the future extensions are eventually proposed for implementation, full environmental analysis and appropriate alternatives will be undertaken at that time. The potential future Kapolei Extension, including areas Ewa of the proposed East Kapolei Station, Marine Corps Air Station Ewa Field, and Naval Air Station Barbers Point, is not part of this Project. Therefore, no further analysis of the Kapolei Extension will be conducted at this time. If the Kapolei Extension is considered and studied in the future, potential project impacts to historic resources identified in this area will be addressed at that time.

The island's unique visual character and scenic beauty was considered in the visual and aesthetic analysis presented in the Final EIS. The Project is intended to protect the overall visual character and scenic beauty of Oahu in the longer term by enabling future development to be more densely concentrated in existing urbanized areas and on land adjacent to urbanized areas, rather than replicating auto-centric sprawl that plagues many Mainland communities.

The Project will be set in an urban context where visual change is expected and differences in scales of structures are typical. In addition, viewers in upper stories of some buildings would be affected by light and glare from trains traveling on the guideway.

The overall objectives and design guidelines for the neighborhoods with planned stations will be addressed during the ongoing station areas planning process. This process involves numerous aspects of transit system design with focus on characteristics and preferences of the communities adjacent to stations. In addition, the Final makes the commitment that the following measures will be included with the Project to minimize negative visual effects and enhance the visual and aesthetic opportunities that the Project creates:

- *Develop and apply design guidelines that will establish a consistent design framework for the Project with consideration of local context.*
- *Coordinate the project design with the City transit-oriented development program within the Department of Planning and Permitting.*
- *Consult with the communities surrounding each station for input on station design elements.*
- *Consider specific sites for landscaping and trees during the final design phase when plans for new plantings will be prepared by a landscape architect. Landscape and streetscape improvements will serve to mitigate potential visual impacts.*

The policy documents that identify significant views and vistas include the Ewa Development Plan *(DPP 2002),* Central Oahu Sustainable Communities Plan (DPP 2002), and Primary Urban Center Development Plan. *These documents are referenced in the visual analysis in Section 4.8 of the Final EIS. The visual effects on Honolulu's Downtown, including the Dillingham Transportation Building are discussed under the Kalihi to Ala Moana Center*

Landscape Unit heading starting in Section 4.8.3 of the Final EIS. In addition, please refer to Section 4.16 of the Final EIS for a discussion of the historic resources qualities of this building.

In addition to the information about visual effects in Section 4.8 of the Final EIS, the Historic Effects Reports discusses effects by resource in greater detail.

Pearl Harbor National Historic Landmark

As referenced above, the Pearl Harbor National Historic Landmark is among resources to receive an adverse effect determination. The Historic Effects Report is available on the project website (www.honolulutransit.org) and from the Department of Transportation Services.

The Pearl Harbor National Historic Landmark is discussed in Section 4.8.3 and in Section 4.16.3. The Final EIS documents the SHPD's opinion that the Project would have an adverse effect to the landmark.

The assessment of the visual effect (in Section 4.8.3 of the Final EIS) notes that the existing viewshed includes transportation infrastructure, namely the Kamehameha Highway.

Chinatown Station

The visual effects of the Chinatown Station are discussed under the Kalihi to Ala Moana Center Landscape Unit heading starting in Section 4.8.3 in this Final EIS. The discussion notes the station and guideway will be the dominant features in views along the Nimitz Highway and that distant views over the Nuuanu Stream and Honolulu Harbor will be partially blocked. The overall objectives and design for the Chinatown District will be addressed during the ongoing station areas planning process. This process involves numerous aspects of transit system design with focus on characteristics and preferences of the communities adjacent to stations. Coordination with SHPD has included the Chinatown District. Following consultation, SHPD concurred with the effect determinations on the Chinatown Historic District and the Hawaii Capital Historic District. These determinations of effect and the SHPD's concurrence are documented in Section 4.16 and Appendix H of the Final EIS.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
Creation Date :	11/3/2008
Creator Affiliation :	
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Submission Method :	Website
Other Submission Method :	
Submission Date :	11/03/2008
Submission Content/Notes :	What would be the hours of operations for the rail. How many trains will we be initially start with. Is it a two-way rail or one rail. How many minutes interval during peak hours. What is the speed of the train, how many minutes does it take to go from end to the other? How much is the fare? Will a transit pass good for bus, boat, and rail? Will there be convenient shops planned at each station? Sorry, no time to navigate your site. These questions are some that are crucial to the sucess of the rail and I haven't heard anybody talking about them. I am in favor of rail but how it is the managed and run makes or breaks it. Thanks,

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June 11, 2010 RT8/09-330344

Mr. Tony Ho
tho227@yahoo.com

Dear Mr. Ho:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

While each of the alternatives discussed in the Draft EIS includes trade-offs between benefits and impacts, the Airport Alternative from East Kapolei to Ala Moana has been selected as the Preferred Alternative as described above. As compared to the alternatives discussed in the Draft EIS, the Airport Alternative will carry the most passengers, provide the greatest transit-user benefits, and result in the fewest vehicle hours of delay. It will provide access to employment centers at Pearl Harbor Naval Base and Honolulu International Airport and will serve the Salt Lake neighborhood with connecting bus service. Of the three Build Alternatives addressed in the Draft EIS, the Airport Alternative will have slightly less impacts to the natural and built environment analyzed in the Draft EIS. During the public comment period on the Draft EIS, the public overwhelmingly supported the Airport Alternative. Of the comments that specifically supported one of the alternatives, more than 75 percent were in support of the Airport Alternative. For more information this selection is discussed in Section 2.4 of the Final EIS. Since publication of the Draft EIS, design has been advanced, further analysis has been

completed, and information has been added in response to comments on the Draft EIS and agency coordination. The Final EIS discusses the process that was used to select the Preferred Alternative, how comments were considered in the decision-making process, impacts and mitigation commitments.

To answer your questions regarding operation of the Project, as described in Section 2.5.1 of the Final EIS, the system will operate between 4:00 a.m. and midnight in both directions. The train will arrive every three minutes during peak periods and will travel at an average speed 30 mph or greater. A trip from one end of the Project to the other will take about 42 minutes. The fleet will include up to 85 vehicles.

The fare to use the system will be the same as for TheBus. Therefore, if it were operating today, it would be $2.25 one way or a rider could use the same monthly pass used for TheBus. As described in Chapter 2, Section 2.5.1 of the Final EIS, the bus and rail systems will have a unified fare structure, including monthly passes that work for both modes. You will be able to use a free transfer to change from one mode to another. If TheBoat is restored in the future, the cost will be the same as well.

Commercial enterprises are not planned within the stations; however, private commercial enterprises are expected to develop around most stations.

The FTA and DTS appreciate your interest in the Project. The Final EIS has been issued in conjunction with the distribution of this letter. You may view the Final EIS on the Project website at www.honolulutransit.org. You may request a DVD of the Final EIS and additional content through the "Contact Us" tab on the website or by calling the Project hotline at 566-2299. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Status :	Initial Action Needed
Creation Date :	12/8/2008
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Submission Method :	Website
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Submission Date :	12/08/2008

Submission Content/Notes : I have traveled to numerous cities in the world and ridden dozens of transit systems with proven ridership histories in their respective communities. There is no doubt in my mind that I have a much more comprehensive understanding of rail systems than most people that live in Hawaii and this is why I not only wish to have my say, but to qualify my opinion as much broader than someone that believes this pie in the sky system is the answer to traffic on the island of Oahu. I feel Honolulu's rail program is flawed in many ways of which I will discuss only the most important.

Ridership is dependent upon many factors most importantly density and convienence. Honolulu, Ewa, Kapolei or where ever there are planned stops has no density. Hong Kong has density, New York has density, the Bay Area to a lesser extent has density. Without it people will have to some how travel to the train in order to get on it. In your EIS there is limited park and ride lots, without ample parking there will never be enough ridership to justify this project.

We are not a mass transit community and will never be one. Not only do most residents commute to and from work, but we all make stops to schools, shopping or run errands in our daily lives. Because we have no public school bus system and the density to make these other daily chores convienent people need to have their personal vehicles and a train, like the bus, is not an option. It is a major flaw to believe you will change the attitudes and behavior of a society simply by building a train that is not accessible to most.

Efficency is key to providing a realized difference in commute times. Aside from possible economic gains commuters ride mass transit in large urban cities because it makes a marked difference in commute times. With 19 stops over 20 miles of rail the proposed train is not much faster than a present express bus and definitely not any faster than the alternate HOT lanes with dedicated expressed busses. Compare for instance Hong Kong's express train to/from the airport to Hong Kong, there are a total of 3 stops prior to reaching the IFC center in under 30 minutes. Distance is approximately 14 miles. This is train is complimented by an underground subway system and other trains than run throughout China. It's purpose is fairly singular as the goal is getting people to and from one of the best airports in the world.

Similarly, stops per mile along BART's routes are far less than the 1 per mile proposed for Honolulu. Secondly, the noise that eminates from steel on steel rail is very loud as anyone that has stood in a New York, Chicago or San Francisco tube can attest to. It is not quite and quite frankly that is why these systems are for the most part burried beneath ground. Your EIS fails to adequately address this problem and sugar coats the end result. What transit system in the world sends trains through the air in it's densist metropolitan area? None, they are all beneath ground because of noise and because they can more efficenciently address ingress/egress issues. Why isn't this a must for Honolulu? It's like the city is attempting to ramrod a third class system down our throats because it does not want to adequately address the real issues. Do it right or don't do it at all would be a good moto to

follow.

Historically, city public works projects have a proven track records of inadequacy, cost overruns and blunders. From sewer work to road maintenance the city has proved time and again that it is not up to task in any facet of public works. It is pitiful to me to compare our achievement and results compared to other cities in the United States and abroad. The fact that it takes 2 years to replace 1.0 mile of sewer under Kapiolani Blvd., all the while leaving the surface road nearly undrivable to anything but a 4WD truck, is inexcusable. I won't go into the same type of project along Kalaheo Ave., but will say that there are few major cities in America that would put up with that type of government foolishness. My assessment of the city being able to bring a 3 rate rail system on line, on budget and on time are just about as optimistic as getting these sewer projects completed. We will be $6B into it before we realize that it is taking twice as long and twice as much as originally estimated.

Lastly and on a more personal I am deeply troubled by trade unions endorsing rail over other alternatives, when they should be neutral. If there are any public works projects, rail, bus, HOT lane or other, they will all require building trades to do, which option is chosen should not be influenced by the ultimate beneficiary of tax payer monies. By using endorsing rail the unions have tainted the project as nothing but political pay back and that wrong. It is so wrong that it should be investigated more thoroughly by Federal authorities, since a small portion of the project's funds are supposed to be coming from that source.

Because I am working and cannot attend tonight's public hearing I would like this to be presented verbally or in writing to those that are in attendance and for the record. Mahalo.

DEPARTMENT OF TRANSPORTATION SERVICES

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SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-331315

Ms. Wailani Ho
P.O. Box 11012
Honolulu, Hawaii 96828

Dear Ms. Ho:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal.

A travel demand forecasting model was used to forecast daily mode of access to the project stations. As shown in Table 3-20 of the Final EIS, 60 percent of riders will access the fixed guideway via bus and 30 percent will access the system by walking or biking. TheBus system will be altered to provide improved connections and/or to reduce duplication of services. Certain local routes will be rerouted to provide frequent and reliable connections to the nearest fixed guideway station. Existing and future bus routes, including route numbers and frequencies, are included in Appendix D of the Final EIS. Because of the high frequency of the fixed guideway service (every three minutes during peak periods and every six minutes during mid-day periods), riders transferring from buses to the fixed guideway will experience minimal wait times. Riders transferring from the guideway service to buses will benefit from improved frequencies on existing bus routes serving stations. Also, several new routes with high

frequencies will be provided as feeders to the guideway system. Since these routes will primarily operate in residential areas, they will provide greater reliability versus routes operating along congested arterials. Accordingly, access to the fixed guideway system will be convenient. Park-and-ride facilities are located at stations with the highest demand for drive-to-transit access.

Your comments concerning the fact that Honolulu is not a mass transit community are noted. However, per data from the U.S. Department of Transportation National Transit Database, in 2006 Honolulu had the fourth highest per capita transit ridership among urbanized areas in the United States, trailing only New York, San Francisco, and Washington, D.C. As a result, Honolulu can be considered a mass transit community. Please see http://www.ntdprogram.gov/ntdprogram/pubs/other_data_products/Top_Transit_Cities.xls.

Regarding transit efficiency and placement of fixed guideway stations, as stated in Section 3.3.2 of the Final EIS, TheBus operates in mixed traffic, without signal priority; therefore, buses are caught in the same congestion as general-purpose traffic. With increasing traffic congestion over the last 20 years, scheduled trip times for bus routes have been lengthened to reflect the additional time each bus trip takes. As a result of longer bus travel times, 128,600 additional revenue hours of bus service were needed in 2007 to deliver the same amount of service TheBus provided in 1984. This inefficiency consumed about $13.5 million in additional annual operating budget expenses in 2007.

The location of fixed guideway stations was based on land use development plans, bus access, room for the station, and expected modes of access to the station. Many fixed guideway stations are located within a mile of each other. Typically, an individual will walk one-half mile to reach a high-capacity transit station. Accordingly, fixed guideway stations are close enough to each other to promote walking and biking access. The average travel speed of the rail line would be reduced if stations were located closer together.

Transit riders will experience substantially reduced travel times with the fixed guideway system. Presently, bus speeds are declining as a result of growth in traffic congestion and the lack of exclusive right-of-way for transit vehicles. Figure 3-6 in the Final EIS compares system-level transit speeds, both with and without the Project. As a result of the increased transit speeds, major reductions in transit travel times will occur for several major markets, such as between Ewa and Downtown Honolulu, as shown in Figure 3-7 of the Final EIS. Trips to and from Mililani and Waikiki, which are not along the alignment, will also benefit from reduced travel times when using the guideway.

Urban sections of many systems, including BART in the San Francisco Bay Area, MARTA in Atlanta, and the Metro in Los Angeles, are elevated. Worldwide, Tokyo, Singapore, and Vancouver, are among many which have elevated systems.

As stated in Section 4.10.3 of the Final EIS, the Project will cause no severe noise impacts. Moderate impacts will occur at upper floors of a few high-rise buildings (as shown in Table 4-18 in the Final EIS). With the recommended mitigation in place (sound absorbing material and wheel skirts), the noise analysis indicates that the new noise generated by the Project will be lower than the existing noise levels in most places.

The project design includes an integrated noise-blocking parapet wall at the edge of the guideway structure that extends 3 feet above the top of the rail. The parapet wall will substantially reduce ground-level noise.

Wheel skirts will increase the benefit from the parapet wall at locations above the elevation of the track. The use of sound-absorptive materials below the tracks in the areas that will experience moderate noise impacts will reduce the Project noise levels from the upper floors to below the impact level. Once the Project is operating, noise levels will be remeasured to confirm that there are no noise impacts from the Project.

FTA has reviewed the Project's cost estimates and determined that the City has the capabilities to implement the Project. We have not received any indication from the FTA that we will not receive Federal funding. Chapter 6 of the Final EIS provides more information regarding the Project's cost estimates and implementation capabilities.

Endorsements of the Project by independent groups are not relevant to the environmental review process. All public comments in support of and in opposition to the Project have been considered in the environmental process. In addition, all comments submitted on the Draft EIS are included in the Final EIS.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
Creation Date :	12/6/2008
Creator Affiliation :	
First Name :	Daniel
Last Name :	Hodel
Business/Organization :	
Address :	76-897 Hualalai Road
Alternative Preference :	
Apt./Suite No. :	
City :	Kailua Kona
State :	HI
Zip Code :	96740
Email :	daniel.hodel@earthlink.net
Telephone :	
Telephone Extension :	
Add to Mailing List :	Email
Submission Method :	Website
Other Submission Method :	
Submission Date :	12/06/2008
Submission Content/Notes :	Many of us living on the Neighbor Islands would visit Oahu much more frequently if the new rail system served the Honolulu Airport. Eliminating the headache of fighting traffic congestion just to get into town would mean more "return business" for Oahu, and I'm sure this applies equally well to tourists from the mainland and overseas. If other factors on the two competing routes are roughly equal, please choose the HNL option. Mahalo.

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, 3RD FLOOR
HONOLULU, HAWAII 96813
Phone: (808) 768-8305 • Fax: (808) 768-4730 • Internet: www.honolulu.gov

MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-331305

Mr. Daniel Hodel
76-897 Hualalai Road
Kailua-Kona, Hawaii 96740

Dear Mr. Hodel:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall indentify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraph addresses your comments regarding the above-referenced submittal:

While each of the alternatives discussed in the Draft EIS includes trade-offs between benefits and impacts, the Airport Alternative from East Kapolei to Ala Moana has been selected as the Preferred Alternative as described above. As compared to the alternatives discussed in the Draft EIS, the Airport Alternative will carry the most passengers, provide the greatest transit-user benefits, and result in the fewest vehicle hours of delay. It will provide access to employment centers at Pearl Harbor Naval Base and Honolulu International Airport and will serve the Salt Lake neighborhood with connecting bus service. Of the three Build Alternatives addressed in the Draft EIS, the Airport Alternative will have slightly less impacts to the natural and built environment analyzed in the Draft EIS. During the public comment period on the Draft EIS, the public overwhelmingly supported the Airport Alternative. Of the comments that specifically supported one of the alternatives, more than 75 percent were in support of the

Airport Alternative. For more information this selection is discussed in Section 2.4 of the Final EIS. Since publication of the Draft EIS, design has been advanced, further analysis has been completed, and information has been added in response to comments on the Draft EIS and agency coordination. The Final EIS discusses the process that was used to select the Preferred Alternative, how comments were considered in the decision-making process, impacts and mitigation commitments.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Record Date :	12/10/2008
First Name :	Buzz
Last Name :	Hong
Business/Organization :	HI Building & Construction Trades
Address :	560 N. Nimitz Highway, #50
Apt./Suite No. :	215A
City :	Honolulu
State :	HI
Zip Code :	96817
Email :	hibuildingtrades@yahoo.com
Telephone :	808-524-2249
Telephone Extension :	
Add to Mailing List :	Both
Submission Method :	Website
Submission Content/Notes :	December 9, 2008

Department of Transportation Services
City & County of Honolulu
650 South King Street, 3rd Floor
Honolulu, Hawaii 96813

RE: IN SUPPORT OF DRAFT EIS
HONOLULU HIGH-CAPACITY CORRIDOR PROJECT
Public Hearings: December 9th – 11th, 2009

Dear Department of Transportation Services:

For the record my name is Buzz Hong, the Executive Director for the Hawaii Building & Construction Trades Council, AFL-CIO. Our Council is comprised of 16-construction unions and a membership of 26,000 statewide.

The Council supports the Draft EIS for the Honolulu High-Capacity Corridor Project, which as part of an integrated mass transit system, is an investment in Oahu's future – growing our economy, protecting our environment, strengthening our communities, and providing reliable and affordable transportation for generations to come.

Thank you for the consideration of our request.

Sincerely,

William "Buzz" Hong

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, 3RD FLOOR
HONOLULU, HAWAII 96813
Phone: (808) 768-8305 • Fax: (808) 768-4730 • Internet: www.honolulu.gov

MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-331591
RT12/08-291105R

Mr. William "Buzz" Hong
Executive Director
Hawaii Building & Construction Trades
Council, AFL-CIO
Gentry Pacific Design Center, Suite 215A
560 North Nimitz Highway, #50
Honolulu, Hawaii 96817

Dear Mr. Hong:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall indentify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraph addresses your comments regarding the above-referenced submittal:

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and built environment analyzed in the Draft EIS. During the public comment period on the Draft EIS, the public overwhelmingly supported the Airport Alternative. Of the comments that specifically supported one of the alternatives, more than 75 percent were in support of the Airport Alternative. For more information this selection is discussed in Section 2.4 of the Final EIS. Since publication of the Draft EIS, design has been advanced, further analysis has been completed, and information has been added in response to comments on the Draft EIS and agency coordination. The Final EIS discusses the process that was used to select the Preferred Alternative, how comments were considered in the decision-making process, impacts and mitigation commitments.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

February 6, 2009.

Mr. Wayne Y. Yoshioka
Department of Transportation Services
City and County of Honolulu
650 South King Street, 3rd Floor
Honolulu, HI 96813
808-768-8303
Email: wyoshioka@honolulu.gov

Dear Mr. Yoshioka:

Comments on the Honolulu Draft Environmental Impact Statement (Draft EIS)

Our comments on the Draft EIS are attached in seven parts:

Part I	All reasonable alternatives were not studied.
Part II	Insufficient consideration of elevated rail impacts.
Part III	The Locally Preferred Alternative must be studied in the EIS.
Part IV	First Project, Phase I, is an illegal segmentation.
Part V	Unjustifiable forecasts.
Part VI	Strategic misrepresentation in the Draft EIS.
Part VII	Strategic misrepresentation outside of the Draft EIS.

We find the Draft EIS continues, as did its forerunners, the Oahu Regional Transportation Plan and the Alternatives Analysis, to mislead the public with unclear language, misrepresentations, and omissions of important material so as to position this document as less of an analytical and informative document and more of a selling tool.

Hopefully you will produce a Supplementary Draft EIS that will remedy these misrepresentations, omissions, and unclear language so that it will be clear to the public that,

- You are forecasting traffic congestion to be worse in the future with rail than it is today.
- An elevated rail line traversing the core of our city will have a deleterious effect on our environment.
- There exists a high risk of property taxes being greatly increased to fund the increased operating subsidies and the missed construction cost forecasts.
- The project places undue risks on an already fragile economy.

We find that the City has taken an insufficiently "hard look" at the alternatives that were rejected, at those issues we have discussed herein as misrepresentations in the Draft EIS, and the ridership forecasts, as examples. They are supposed to be dealt with in detail. As one court held,

> *... assumptions must be spelled out, inconsistencies explained, methodologies disclosed, contradictory evidence rebutted, record references solidly grounded, guesswork eliminated and conclusions supported in a manner capable of judicial understanding.* [1]

We find that the City and Parsons Brinckerhoff have not produced a document that has handled these important environmental issues with the objectivity and scientific rigor that is both needed by the public and is a NEPA requirement.

[1] E. I. DuPont de Nemours & Co. v. Train, 541 F.2d 1018, 1038 (4th Cir. 1976).

In summary, we believe the alternatives analysis is legally insufficient since the Managed Lanes Alternative analysis is so lacking in factual substance that it must fail to give the reader the true meaning of the alternative. Failing to provide accurate and complete information, especially for one of the most important socioeconomic factors — the incredibly high cost to Hawaii's citizens — makes this a faulty document that must be redone.

When the analysis fails to describe the incredibly low cost of the Tampa project when compared to the projected Hawaii costs, one cannot help to wonder why this fact was left out. Socioeconomics has been given very little if any attention in this document and failure to point out the Tampa project was approximately seven times cheaper than this proposed action is problematic and thus the underlying analysis fails.

The people of Hawaii were not given this information and if they were given this information, perhaps the vote may have gone differently. If they had been given this information in this NEPA document, perhaps they would have had more meaningful comments on the proposed action. We will not know unless a new Draft EIS is produced.

The Draft EIS is also simply not readable and thus doesn't give the opportunity for the reader to make meaningful comments. It incorporates by reference 20 studies and the Draft EIS fails to weave a narrative that accurately describes in the NEPA document, as required by NEPA, the true potential impacts that will be caused by the proposed action.

In a less complicated project, perhaps this would be acceptable; but in a proposed $5 billion project that will displace hundreds of people, condemn homes and businesses, disrupt traffic and Oahu's quality of life, disturb cultural resources, potentially uncover sacred *iwi*, cause financial hardship to hundreds of thousands of people, while disregarding reasonable alternatives, or leaving out key components of other alternatives, is completely unacceptable.

The City and County and the FTA must be held to the standard required by the 9th Circuit, NEPA, and Hawaii State law, and the information presented fails to meet these standards. We request that a Supplemental Draft EIS be undertaken.

Sincerely,
HONOLULUTRAFFIC.COM

Cliff Slater
Chair

CDS/rrs

cc: Mr. Ted Matley
FTA Region IX
201 Mission Street, Suite 1650
San Francisco, CA 94105
Email: ted.matley@fta.dot.gov.

February 6, 2009

Part I — "All reasonable alternatives" were not studied.

"There's small choice in rotten apples."

This line from Shakespeare's *The Taming of the Shrew* is, appropriately, the opening line in the FTA's introduction to *Evaluation of the Alternatives.*[1]

We believe that insufficient alternatives were considered during the Alternatives Analysis. Each prior rail transit effort in Honolulu from the 1970s on has suffered from the same problem; the range of alternatives studied was inadequate and disinterested experts have all commented on it.

> *Finally, the most serious deficiency of analyses done to date is the failure to devise and evaluate meaningful alternatives to HART [Honolulu Area Rapid Transit]. The so-called "alternatives analysis" is seriously deficient and the bus alternative considered in them can only be considered as "straw men."*
> *Dr. John Kain, Chair, Economics Department, Harvard. 1978.*[2]

> *In particular, what is lacking is a serious investigation of several viable dedicated busway options.*
> *Dr. Robert Cervero, Professor of Urban and Regional Planning, UC-Berkeley. 1991.*[3]

Many more examples in a similar vein are available from experts' critiques of the 1990 Alternatives Analysis.[4]

The National Environmental Policy Act (NEPA) process requires that the City & County of Honolulu (City),

> *Rigorously explore and objectively evaluate all reasonable alternatives ... Devote substantial treatment to each alternative considered in detail including the proposed action so that reviewers may evaluate their comparative merits ... Include reasonable alternatives not within the jurisdiction of the [City].*[5]

The Council on Environmental Quality's (CEQ) comments on 1502.14 is as follows:

> *Section 1502.14 requires the EIS to examine all reasonable alternatives to the proposal. In determining the scope of alternatives to be considered, the emphasis is on what is "reasonable" rather than on whether the proponent or applicant likes or is itself capable of carrying out a particular alternative. Reasonable alternatives include those that are practical or feasible from the technical and economic standpoint and using common sense, rather than simply desirable from the standpoint of the applicant.*[6] *(emphasis added)*

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1 http://www.fta.dot.gov/documents/Evaluation_of_Alternatives.pdf

2 Seminar on Urban Mass Transit (transcript). Office of the Legislative Auditor, State of Hawaii. January 1978.

3 Quoted from "An Evaluation of the Honolulu Rapid Transit Development Project's Alternative Analysis and Draft Environmental Impact Statement." Hawaii Office of State Planning and University of Hawaii. May 1990. Robert Cervero, Professor of Urban and Regional Planning at the University of California, Berkeley, and a member of the Editorial Board, Journal of the American Planning Association.

4 An Evaluation of the Honolulu Rapid Transit Development Project's Alternative Analysis and Draft Environmental Impact Statement. Hawaii Office of State Planning and University of Hawaii. May 1990. Available at the Honolulu Municipal Library.

5 40CFR1502.14

6 Question 2A in CEQs 40 Q&As. http://www.nnrg.gov/meetings/2005compacts/pdfs/40Questions.pdf

In addition to rail transit and No-Build, there are at least three other alternatives that should have been considered in the Draft EIS:

1. The Reversible Managed Lane Alternative
2. The 2003 Bus/Rapid Transit Project
3. The EZway plan.

1. The Reversible Managed Lane Alternative.

The draft EIS shall evaluate all reasonable alternatives to the action and discuss the reasons why other alternatives, which may have been considered, were eliminated from detailed study. (23CFR771.123)

The reasons given for the elimination of the Managed Lane Alternative from the Draft EIS are insufficient since little supporting data is given for the conclusions reached and no reference is given to any other publication that might have it. It is not surprising since there was little in the Alternatives Analysis or in the documents regarding the second Scoping when we first found that the Managed Lane Alternative had been eliminated.

For example, the Draft EIS tells us *"that the Managed Lane Alternative would provide slightly more benefit [than TSM] at a substantial cost."* We can only guess at what that means.

A Bus/Rapid Transit (BRT) bus would travel at 55mph while on the Managed Lanes and, say, 15 mph when on city streets. If the distance traveled on city streets is one-half of that traveled on the Managed Lanes the average speed would be 29 mph — faster than trains. But the benefit to users of trains is supposedly three times that of the Bus/Rapid Transit on Managed Lanes?

Also two, or possibly three, additional lanes managed through dynamic pricing would each have a vehicle throughput close to twice that of each of the nearby congested freeway lanes according to the Federal Highways Administration (FHWA).[7] Such lanes would add the equivalent of four to six lanes to the current (and projected through 2030) five regular freeway lanes. And we are supposed to believe that traffic congestion[8] will be far worse with Managed Lanes? There is no support for this in the Draft EIS nor any reference to other documents.

We made the original proposal for a reversible dynamically-tolled highway which led to its inclusion in the First Scoping authorized in the federal Notice of Intent of December 5, 2005.

The concept that we proposed to the City was what Reason Foundation's Robert Poole, termed a *Virtual Exclusive Busway* where buses and vanpools have priority and go free of toll charges and all others pay a dynamically-priced toll. It has all the virtues of an exclusive busway, while also having a significant impact on automobile traffic congestion in the Corridor.

The City's Chief Transportation Planner said that he used the map of our proposed route from our website and that, *"This is what HONOLULUTRAFFIC.COM requested us to study and this is exactly what we studied."*[9]

However, our original proposal was only a conceptual one; at the time we did not have the technical expertise to do anything else and we certainly did not have the resources to submit a comprehensive design. Far from being a design, a cursory look at our original map shows a freehand line drawn none too steadily along the route with a black marker pen. It never crossed our minds that Parsons Brinckerhoff would not apply its expertise to provide the best possible alternative.

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7 FHWA's *Congestion Pricing — A Primer*. At: http://www.honolulutraffic.com/congestionpricing.pdf p. 3.

8 See Vehicle Hours of Delay in Table 2-1, Draft EIS.

9 League of Women Voters Forum video, http://www.brightcove.tv/title.jsp?title=1301088850&channel=293897125 5:00 minute mark of 10 minute video.

We had forecast a cost of $900 million for a 10-mile two-lane version. This estimate of cost came from a one-day conference that Governor Lingle asked us to conduct in December 2002 to evaluate whether the reversible tolled transitway concept was worth pursuing. Some of Hawaii's and the nation's leading experts[10] on this issue were represented at the conference. The concept and cost estimates met with the general approval of the attendees and accordingly we recommended to the Governor that the project be further developed to a higher level of detail.

In December 2005, the FTA issued the first Notice of Intent and it stated,

> *Alternatives proposed to be considered in the AA [Alternatives Analysis] and draft EIS include No Build, Transportation System Management, Managed Lanes, and Fixed Guideway Transit.*

After the first Scoping, the Scoping Report of April 6, 2006[11] issued and confirmed that the Managed Lane Alternative would be studied in both the Alternatives Analysis and the Draft EIS.

Subsequently, the Alternatives Analysis was produced in November 2006 and recommended that the Fixed Guideway Alternative be adopted as the Locally Preferred Alternative and shortly thereafter the City Council chose the Fixed Guideway Alternative with termini at West Kapolei, University of Hawaii at Manoa and Waikiki.

However, the Managed Lane Alternative was not objectively studied in the Alternatives Analysis. Rather, the Managed Lane Alternative was setup as a classic "straw man," contrived to make it look ineffective in comparison to rail transit.

Professor John Kain, co-author of the classic *The Urban Transportation Problem*, who wrote extensively about such tactics, wrote in his *The Use of Straw Men in the Economic Evaluation of Rail Transport Projects,*[12]

> *Nearly all, if not all, assessments of rail transit systems have used costly and poorly designed all-bus alternatives to make the proposed rail systems appear better than they are.*

Out of the blue, on March 15, 2007, the FTA issued a second Notice of Intent[13] but this time excluded the Managed Lane Alternative. This was the first intimation we had of its rejection. Both the first Notice of Intent[14] and the first Scoping Report[15] had stated that the Managed Lane Alternative would be studied in the Draft EIS.

Mr. David Glater, then the recently retired Chief Counsel of the US DOT's Volpe Center, who had been appointed to be the Transportation Analyst for the City Council's Transit Advisory Task Force, and who wrote the Task Force Report, must have also been surprised since his Appendix 3, attached hereto as Appendix B, is titled, *"Suggestions for further development of the Managed Lane Alternative."*

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[10] In attendance: Mike Schneider, Executive Vice President of PB Consult, Mel Miyamoto, Vice President, Heavy Construction, Dillingham Corporation, Roger Morton, General Manager of OTS Inc, operators of the City's bus system, Bruce Turner, Assistant Division Administrator, Hawaii Division FHWA, Robert Poole, Director of Transportation Studies, Reason Foundation, Glenn Yasui, Highways Division, Hawaii Dept. of Transportation (Hawaii DOT). By phone: Patrick DeCorla-Souza, AICP, Team Leader, Highway Pricing and System Analysis, Office of Transportation Policy Studies FHWA, C. Kenneth Orski., Urban Mobility Corporation, consultant and publishers of *Innovation Briefs.*

[11] http://www.honolulutraffic.com/ScopingReport.pdf

[12] Kain, John F. *The Use of Straw Men in the Economic Evaluation of Rail Transport Projects,* American Economic Review, Vol. 82, No. 2, Papers and Proceedings of the Hundred and Fourth Annual Meeting of the American Economic Association (May, 1992), pp. 487-493. At: http://www.honolulutraffic.com/kainrail.pdf

[13] www.honolulutraffic.com/noi0307.pdf

[14] www.honolulutraffic.com/NOI051205.pdf

[15] http://www.honolulutraffic.com/ScopingReport.pdf

AR00002019

The second Notice of Intent did not even want comments on alternatives that were *"previously studied and eliminated for good cause."* While not named, one can reasonably assume it referred to the Managed Lane Alternative.

On March 18, 2007, we wrote to the FTA protesting that the process used by the City for assessing the Managed Lane Alternative in the Alternatives Analysis was flawed.[16] We also protested the issuance of two Notices of Intent to perform the same Draft EIS. We received no response to these communications.

Honolulu found itself in the strange position of beginning Scoping while having already selected its Locally Preferred Alternative.

The second Scoping Report that issued May 30, 2007[17] implies that the Managed Lane Alternative was rejected at least in part because,

> *The Honolulu High-Capacity Transit Corridor Project analysis is meant to evaluate project alternatives that may be constructed within the authorization of Act 247, enacted by the Hawai'i State Legislature in 2005. The act prohibits the construction of a non-transit project with the authorized excise-tax surcharge. Projects with the purpose of providing roadway mobility for automobiles and commercial vehicles are not fundable by Act 247; therefore, they will not be added to the purpose of the Honolulu High-Capacity Transit Corridor Project*[18].

However, this is the first mention of Act 247 through two Notices of Intent and two SIPs and the first Scoping Report. In any case, is this reason for rejection not in conflict with the following?

> *An alternative that is outside the legal jurisdiction of the lead agency must still be analyzed in the EIS if it is reasonable. A potential conflict with local or federal law does not necessarily render an alternative unreasonable, although such conflicts must be considered. Section 1506.2(d). Alternatives that are outside the scope of what Congress has approved or funded must still be evaluated in the EIS if they are reasonable, because the EIS may serve as the basis for modifying the Congressional approval or funding in light of NEPA's goals and policies.*[19]

The second Scoping Information Package describes the Fixed Guideway Alternative as follows:

> *The fixed guideway system is planned to operate between 4 a.m. and midnight, with a train arriving in each direction at each station between every three and ten minutes ... The system is planned to operate with multicar trains approximately 175 to 200 feet in length, with each train capable of carrying a minimum of 300 passengers. This would provide a peak capacity of at least 6,000 passengers per hour per direction.*[20]

Since at this point the *de facto* decision to select trains as the preferred mode alternative had already been made, does not the issuance of a new Notice of Intent circumvent the requirement that NEPA *not be used to rationalize or justify decisions already made?* [21]

The second Scoping Report states,

As stated in the Notice of Intent issued on March 15, 2007, that Notice of Intent superceded [sic] the one published on December 5, 2005.[22]

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16 www.honolulutraffic.com/AAMI.comments5.pdf
17 http://www.honolulutraffic.com/NEPAScopingReport.pdf
18 The second Scoping Report, p. 5-1. Act 247 is at
19 http://www.nepa.gov/nepa/regs/40/1-10.HTM#2
20 Scoping Information Package, 4-1&2. http://www.honolulutraffic.com/ScopingInformationPackage.pdf
21 "Environmental impact statements shall serve as the means of assessing the environmental impact of proposed agency actions, rather than justifying decisions already made." 40CFR1502.2[g]

AR00002020

This is not true; the second Notice of Intent states no such thing.

The second Scoping Report also states that,

> *City Council Resolution 07-039 defined the First Project as extending from East Kapolei to Ala Moana Center.*[23]

Resolution 07-039 uses the term "Minimum Operable Segment" to describe the shortened project and never mentions "First Project"; the term in the second Scoping Report only serves to confuse the issue.

Also federal regulations require that, *"Draft environmental impact statements shall be prepared in accordance with the scope decided upon in the scoping process."*[24]

The first Notice of Intent was not superseded and the Alternative Analysis states that its alternatives were developed *"during a formal project scoping process held that would satisfy the requirements of the National Environmental Policy Act (NEPA) ..."*[25]

The second Scoping Information Package and the second Scoping Report suggest that the first Notice of Intent was to merely satisfy Hawaii Revised Statutes 343, even though there is no mention of that in either of the two federal Notices of Intent or the subsequent Scoping Report. In any case, that does not wash since, if satisfying Hawaii Revised Statutes 343 was the only intent of the first Notice of Intent, would not the FTA's issuance of it have been unnecessary?

In addition, this action by FTA would appear to violate 40CFR1506 which requires agencies

> *... to the fullest extent possible to reduce duplication between NEPA and state and local requirements.*

And NEPA §1500.6 makes it clear that,

> *The phrase "to the fullest extent possible" in section 102 means that each agency of the Federal Government shall comply with that section unless existing law applicable to the agency's operations expressly prohibits or makes compliance impossible.*

This requirement is, in part, to avoid the kind of time consuming and confusing situation we now have.

Neither the FTA nor the City has made any attempt to clarify why FTA issued the second Notice of Intent. While the first Notice of Intent initiated the NEPA review process, the second Notice of Intent informed us that the NEPA review was *"initiated through this scoping notice."* Have we not been in the NEPA process since December 2005? Why was a second scoping necessary?

The City did not make the case in the second scoping documents that re-scoping was being conducted because the first was inadequate or unsatisfactory. And if it had been inadequate would not the second scoping merely have been to supplement the first scoping and not to replace it?

There has obviously been insufficient *"public involvement,"* as required by SAFETEA-LU, if we cannot even find out whether the NEPA review process started on December 5, 2005, or March 15, 2007. Why cannot the public be told why the second scoping was authorized and if it invalidated the findings of the first Scoping?

We believe that the City and Parsons Brinckerhoff had the second Notice of Intent issued in an attempt to evade the more stringent investigative requirements of the NEPA process for the Managed Lane Alternative and possibly also for the purpose and needs statement.

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22 Second Scoping Report, p. 5-1, at http://www.honolulutraffic.com/NEPAScopingReport.pdf

23 Resolution 07-039, http://www4.honolulu.gov/docushare/dsweb/Get/Document-59473/23mkUlib.pdf

24 40CFR1502.9.

25 www.honolulutraffic.com/AAD.pdf p. 2-2.

Six specific ways in which the Managed Lane Alternative was contrived to fail are listed below.

a) Zipper lane inexplicably removed:
b) Excessive Managed Lane Alternative capital costs:
c) Inflated operating costs:
d) Effects on vanpools not considered.
e) Inefficient ingress/egress ramps:
f) Avoidance of due diligence:

a) Zipper lane inexplicably removed

In November 2006, the City Council convened a Transit Advisory Task Force (Task Force) to advise it on the technical aspects of the Alternatives Analysis. Mr. David Glater, retired Chief Counsel of the U.S. Department of Transportation's Volpe Center, and Transportation Analyst for the Task Force, wrote in his Final Report to the City Council,

> *The description of the Managed Lane Alternative in Chapter 2 of the Alternatives Analysis states that, 'The H-1 zipper lane would be maintained in the Two-direction Option but discontinued in the Reversible Option.' (p. 2-4). However, no explanation is provided as to why the zipper lane would not be continued in the Reversible Option. The Managed Lane Reversible Option's addition of two Koko Head-bound elevated lanes for the morning commute appears to result in a net increase of only one lane if the inbound zipper lane were removed.*[26]

Why was the zipper lane taken out? When it remains in, it alone negates the conclusions of the Alternatives Analysis that the Managed Lane Alternative was inferior to rail in traffic congestion reduction as can he seen from the table below. With the zipper lane reinstated traffic on the H-1 freeway regular lanes would be less with the Managed Lane Alternative than the Fixed Guideway Alternative.

Congestion relief together with energy consumption, both of which are required to be analyzed by statute,[27] would he significantly improved with the Managed Lane Alternative. The following table is identical to the data in Table 3-12 in the Alternatives Analysis with the exception of the center column showing the zipper lane reinstated and a new line at the bottom of the page to total all traffic.

The only changes made to original column, which is to its left, are those in the grayed out cells. These reflect the same zipper lane traffic as in the Rail column and reduction of that same amount of traffic in the H-1 Freeway traffic. It shows that with the zipper lane reinstated the H-1 traffic is less than the traffic in the Rail Alternative.

For example, the single major freeway into downtown Honolulu from the far end of the study Corridor is H-1. It has seven lanes inbound during the morning peak hours, of which one is a zipper lane, one is an HOV lane, and five lanes are regular freeway lanes.

With the zipper lane reinstated the Managed Lane Alternative would provide two, or possibly three, additional lanes managed through dynamic pricing. Each lane would have a vehicle throughput close to twice that of each of the nearby congested freeway lanes.[28] Such lanes would add the equivalent of four to six lanes to the current (and projected through 2030) five regular freeway lanes (this is not provided for in the table that follows).

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[26] Task Force Final Report, http://www.honolulutraffic.com/TaskForceReport.pdf
[27] 119 STAT. 1576 (d) (3) (D) http://bulk.resource.org/gpo.gov/laws/109/publ059.109.txt
[28] FHWA Congestion Pricing Primer, www.honolulutraffic.com/congestionpricing.pdf

	2030 Managed Lanes			2030 Managed Lanes			Rail		
	Reversible Option			Reversible Option with the zipper lane reinstated			Kamokila - Airport - Dillingham King with a Waikiki branch		
SCREENLINE/FACILITY	Forecast Volume (vph)	Volume/ Capacity Ratio	Level of Service	Forecast Volume (vph)	Volume/ Capacity Ratio	Level of Service	Forecast Volume (vph)	Volume/ Capacity Ratio	Level of Service
Kalauao Stream Koko Head bound									
H-1 Fwy	18,419	1.94	F	18,235	1.71	F	17,414	1.83	F
H-1 Fwy (HOV)1	2,769	1.46	F	2,769	1.46	F	2,701	1.42	F
H-1 Fwy (Zipper) 1	NA	NA	NA	2,154	1.13	F	2,154	1.13	F
Moanalua Rd	966	0.57	A	966	0.57	A	756	0.44	A
Kamehameha Hwy	3,121	0.9	E	3,121	0.9	E	2,923	0.85	D
Managed Lane	3,457	0.79	C2	3,457	0.79	C2	NA	NA	NA
Total General Purpose Traffic	22,507	1.39	F	20,322	1.39	F	21,093	1.31	F
Total HOV Traffic	2,769	1.46	F	4,923	1.46	F	4,855	1.28	F
Total Managed Lane Traffic	3,457	0.79	C2	3,457	0.79	C2	NA	NA	NA
Total All Traffic	28,733			28,702			25,948		

The grayed cells are the only ones changed from the Alternatives Analysis, Table 3-12.

The Total All Traffic was not provided in the original. Others may wish to check our addition.

Changes made were to reinstate the zipper lane using vehicle data from the fully built out rail option.

Then reduce the H-1 Fwy forecast by a like amount. Other changes are merely recalculation of totals.

The congestion mitigation effects of these additional lanes to the seven-lane H-1 freeway are too obvious for the effect not to have been noticed during the Alternatives Analysis process.

b) Excessive Managed Lane Alternative capital costs

Parsons Brinckerhoff and the City grossly inflated the capital costs of the Managed Lane Alternative with the result that, if correct, it would result in it having twice the cost per lane-mile of any highway ever built in the U.S.

Parsons Brinckerhoff and the City also added unnecessary costs to the project by only using a 16-mile facility while not testing the viability of shorter 10 to 12-mile versions.

The City's projected cost of $2.6 billion in 2006 dollars for the Managed Lane Alternative was excessive. It was twice as expensive as the H-3 freeway per lane mile, almost as much per mile as the rail transit line, and seven times as much as the Tampa Expressway, a similar but even larger facility. And the City made it 50 percent longer than necessary. Further, the normal due diligence expected for a project of this magnitude was not undertaken.

Had the Managed Lane Alternative been projected at 11 miles long and priced to be the same as H-3 per lane mile (allowing for inflation), the projected cost would have been only $915 million (still twice as much as the Tampa Expressway). Of this amount half could have been paid for with toll revenue bonds and the other half with less than three years of the ½ percent GE tax revenues (assuming the unlikely scenario of Senator Inouye being unable to obtain any federal funds).

And the city did not study the effects of the Managed Lane Alternative having three lanes. Tampa added the third lane after finding that this 50 percent increase in lane space would cost only 20 percent more than two lanes.

Anyone who has ever travelled the H-3 will find it absurd that the City's cost estimate of the Managed Lane Alternative could be the same as the H-3 (inflation-adjusted). The City's projected costs for the Managed Lane Alternative were calculated without any attempt to justify this high cost by comparing it to similar facilities in Hawaii or on the Mainland.

As discussed earlier, our cost projection was $900 million for a 10-mile two-lane elevated highway, or $90 million per mile in 2002. This cost when inflated using the *Price Trends for Federal-aid Highway Construction Index*,[29] results in $134.7 million per mile in 2006 dollars.

However, this estimate was made before we were aware of the astonishing cost savings offered by the new construction method devised by Figg Bridge Company and used to construct the Tampa Expressway.

Tampa Expressway:

> *The actual contract price for the 17.5 lane miles of bridge structure was just over $100 million. At approximately $120 million, the deck cost for the segmental bridge portion of the project was approximately $65 per square foot, far below the average cost for structures in Florida during the past 20 years. The average cost per lane mile for the reversible bridge is approximately $7 million and is among the lowest for bridges constructed in the U.S.*[30]

The Figg Bridge Company tells us they "*have experienced savings of approximately 40 percent to 50 percent when using precast segmental span-by-span construction in urban settings when compared to segmental balanced cantilever construction.*"[31]

Using 45 percent as the average of these savings reduces our $134.7 million per mile projection to $74.1 million per mile in 2006 dollars, or $37.0 million per lane-mile.

Recently Figg Bridge, which is familiar with Hawaii conditions, told us they believe there is no reason why the Managed Lane Alternative should not be built for the same cost per mile that they are experiencing in Florida for 2008 given the addition of a further 32 percent for the construction cost differential between Hawaii and Florida.

The 14-mile Expressway cost $320 million in 2006 (net of an impending award of $100 million for a sub-contractor's error). Using the same *Price Trends for Federal-Aid Highway Construction Index* that the City uses, and allowing the mid-point of costs to be 2004, we calculate that the cost to build it in 2006 would have been $458.7 million.

The cost comparison index used to inflate Florida construction costs to Hawaii's level is an additional 32 percent, that being the rate given in the current *Civil Works Construction Cost Index*.[32] Applying this factor to the inflation adjusted cost, results in $605 million as the cost of constructing the facility in Honolulu. Dividing this by its 14-mile length results in $43.2 million per mile.

While Tampa has three lanes, the Expressway Authority tells us that the third lane only added 20 percent more to their costs than if they had only built two lanes. We have, therefore, divided the Tampa cost per mile by only 2.4 instead of three to arrive at a cost for a two-lane facility. It

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[29] http://www.fhwa.dot.gov/programadmin/pt2006q4.cfm

[30] Prevedouros, Panos D., PhD and Martin Stone, PhD, AICP. *Reversible Express Lanes.* Yearbook of Science and Technology 2008. McGraw-Hill, pp. 288-291, 2008.

[31] Personal Communication, CEO, Figg Bridge Company.

[32] http://www.usace.army.mil/publications/eng-manuals/em1110-2-1304/entire.pdf p. A-34.

results in a cost of $18.0 million per lane-mile as a comparable cost for building such a facility in Honolulu.

Hawaii's H-3 Freeway:

The 16.1-mile H-3 freeway is a divided highway with two lanes in each direction and its construction required boring two miles of tunnels through the solid rock of the Koolau Mountains. The total cost was $1.3 billion at completion in 1997 making it the most expensive highway per mile ever built in the U.S.

Lacking a distribution of costs by year, we have allowed the mid-point of construction cost as occurring in 1991. Inflating the $1.3 billion to 2006 dollars using the *Price Trends for Federal-Aid Highway Construction Index*[33], results in $2.7 billion.

This amount divided by the 16.1 mile length equals $166.2 million per mile and dividing that by the four lanes results in $41.6 million per lane-mile.

Capital costs summary:

We show below an adjusted cost per lane-mile comparison with two highway facilities, one from Tampa, Florida and the other, the H-3 freeway in Honolulu together with both the City and our Managed Lane Alternative cost projections.

The table below summarizes our calculations of all four facility costs per lane-mile after being adjusted for construction inflation costs and location cost differentials. This enables us to directly compare one with the other. The full calculation is given in detail in Appendix A.

Adjusted cost per lane-mile in 2006 dollars[34]

Facility	$millions
Tampa Expressway actual, adjusted to Honolulu costs	$18.0
H-3 Freeway actual, adjusted	$41.6
Our Managed Lane Alternative estimate, adjusted	$37.0
City's Managed Lane Alternative estimate	$80.5

Note that our Managed Lane Alternative estimate is within ten percent of the adjusted H-3 freeway cost. In consideration of the extensive trans-Koolau tunneling required for H-3 one would anticipate that our Managed Lane Alternative estimate should be somewhat less.

Even allowing for inflation and location cost differences, the adjusted Tampa Expressway cost is still less than half of either the H-3 or our Managed Lane Alternative estimate.

However, the most striking comparison is that the City Managed Lane Alternative estimate is twice that of the H-3 freeway and over four times that of the Tampa Expressway — after all adjustments. We do not believe that this projected cost would ever pass scrutiny by any members of the professional engineering community.

Our cost calculations for the Managed Lane Alternative, while compelling, need more work at a level of detail requiring resources that are not available to us. Our concern is that the City and Parsons Brinckerhoff did not make any serious effort to investigate it at any level of detail, as the section of lack of due diligence demonstrates.

At the behest of FTA, Booz Allen investigated the Fixed Guideway Alternative and the Managed Lanes Alternative construction costs. They produced a preliminary 8-page draft in April 2007 and later followed that in May 2007 with a 38-page full report.[35]

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[33] http://www.fhwa.dot.gov/programadmin/pl2006q4.cfm

[34] See Appendix A for details of cost adjustments for construction inflation and location differences.

[35] FTA PROJECT MANAGEMENT OVERSIGHT PROGRAM, Contract No. DTFT60-04-D-00013 Project No. DC-27-5041 Task Order No. 10

The 8-page draft does mention the Tampa Expressway and also Dr. Stone's comments,

> *Dr. Marty Stone [PhD AICP], planning director for the Tampa-Hillsborough County Expressway Authority, wrote a lengthy defense of the construction of his agency's reversible, elevated toll lanes in Tampa for HawaiiReporter.com on November 21, 2006. Dr. Stone criticized rail proponents in Honolulu for what he perceived as misrepresentation of the Tampa project in order to discredit the managed-lanes alternative in Honolulu.*

However, neither Tampa nor Dr. Stone appear in the subsequent full report. This is a shame because it would have been interesting to know why an award-winning public planning official would go out on a limb to criticize fellow public officials.

The full report begins by telling us that the primary objective was to, *"confirm absence of bias in cost estimation between the Fixed Guideway and Managed Lanes alternatives."* Not to determine whether there was any bias, but rather to confirm that there was none.

Booz Allen's 38-page report covers a wide variety of cost estimating material but evades a very important and most awkward fact, and that is the cost of the Tampa Expressway was $300 million.

The investigator does not grapple with this fact; the word Tampa cannot be found in this document. The group that put together the expressway, the Tampa-Hillsborough Expressway Authority and Figg Bridge have won just about every national award possible[36] and built it at a remarkably low cost.

The Tampa cost is a stubborn and intractable fact, one that will never go away until rail proponents confront it instead of evading it as the City has, as the Transit Advisory Task Force did and as Booz Allen does in this case.

To be credible an assessment of the Managed Lane Alternative costs must be performed with "scientific accuracy" and has to reconcile the $300 million for the Tampa Expressway (even to include the $120 million error) with a similar project in Honolulu for $2.6 billion. Allowance can be made for construction costs inflation, location differences, and other smaller issues but an honest appraisal is unlikely to be able to bridge this widest of chasms.

A credible assessment could start by talking to Figg Bridge to ask them how they did it and whether it could be done in Hawaii. No one involved in the pricing, and the validation of the pricing, of the Managed Lane Alternative — the City, the Council Task Force, or Booz Allen — has ever contacted Figg Bridge.

c) Inflated Managed Lane Alternative operating costs

Parsons Brinckerhoff and the City also inflated Managed Lane Alternative operating costs to make the project appear uncompetitive with the Fixed Guideway Alternative.

The Alternatives Analysis had forecast that operating costs for the Managed Lane Alternative would be greater than the FGA. These high operating costs occur because,

> *Transit operating costs for the Managed Lane Alternative would range between approximately $251 and $261 million as a result of additional buses that would be put in service under that alternative.*[37]

The Alternatives Analysis projects that the Managed Lane Alternative will need a fleet of 906 buses versus the No-Build Alternative requiring 614 buses.[38] This would result in the Managed

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[36] http://www.tampa-xway.com/documents/Awards/R11.%20Awards.pdf

[37] Alternatives Analysis, page S-4, at: http://www.honolulutraffic.com/AAD.pdf

Lane Alternative having 50 percent more buses than the No-Build Alternative yet the City projects only 5 percent greater ridership for it.[39] This small increase is projected despite the Managed Lane Alternative offering bus users the advantage of a congestion free bus ride from the H-1/H-2 merge to Downtown. It begs the question, why would the Managed Lanes Alternative offering much faster bus service than the No-Build not generate many more riders?

Fundamentally, the Managed Lane Alternative provides the existing bus system with a faster method of transiting the Corridor. Buses would be able to travel Koko Head bound in the AM peak on the Managed Lane Alternative at three times the current 20 mph operating speed of buses on the H-1 freeway. Buses can then return to their original departure point via the H-1 freeway in the Ewa Bound direction in relatively uncongested traffic.

This will allow some express buses to make two round trips in the time it presently takes to make one. One might anticipate that such efficiency would allow a considerable increase in ridership to be achieved at about the same operating costs as is experienced *currently*, allowing for inflation.

Instead, the Alternatives Analysis forecasts that the Managed Lane Alternative would require the operation of 48 percent more buses[40] than the No-Build Alternative while carrying only five percent more trips[41] and that this would cost 36 percent more in operating costs than the No-Build and even more than the FGA.

In addition, the Alternatives Analysis projected a totally unnecessary 5,200 parking stalls for the Managed Lane Alternative, only slightly less than the 5,700 stalls projected for the entire rail line other than a pro-rata increase in the 529 stalls presently available, nor is there any need for bus stations on Managed Lane Alternative.[42]

The City's and Parsons Brinckerhoff's plan has been to simply drive up operating costs to project that the Managed Lane Alternative is uneconomical in comparison with rail transit.

d) Effects on vanpools not considered.

The same benefits accruing to buses, including and freedom from toll charges, will also apply to vanpools. Such travel time savings can increase bus and van ridership and decrease both the amount of traffic and the share of low occupancy vehicles.

Vanpools have by far the lowest use of energy of any form of mechanized transportation using only 1,322 BTUs per passenger mile.[43] That is less than one-third of that used by the unweighted average of rail transit lines and so offers a significant opportunity to reduce energy use, reduce emissions, reduce traffic congestion, and since vanpools require no operating subsidy, an opportunity to reduce TheBus operating losses.

e) Ingress/egress insufficiently studied

Parsons Brinckerhoff and the City engineered the ingress and egress ramps in a way that could only result in heavy traffic congestion at the Koko Head end of the Managed Lane Alternative.

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[38] Alternatives Analysis, Table 2-1, at: http://www.honolulutraffic.com/AAD.pdf

[39] The bus fleet data is taken from the Alternatives Analysis, Table 2-1, and the daily trips data from the Alternatives Analysis, Table 3-7. The percentages shown are calculated from these data. At: http://www.honolulutraffic.com/AAD.pdf

[40] Alternatives Analysis, Table 2-1.

[41] The bus fleet data is taken from the Alternatives Analysis, Table 2-1, and the daily trips data from the Alternatives Analysis, Table 3-7. The percentages shown are calculated from these data.

[42] Alternatives Analysis, pp. 3-7/8 and 3-10, at: http://www.honolulutraffic.com/AAD.pdf

[43] U.S. Dept. of Energy Data Book, table 2.12, at: http://cta.ornl.gov/data/tedb27/Edition27_Chapter02.pdf

The Task Force Report, Appendix 3,[44] contains the following statement,

> *In its discussion of travel time benefits of the Managed Lane options, the Alternatives Analysis projects that traffic congestion at both the H-1 Freeway access to the Managed Lane facility and at the Nimitz Highway exit at Pacific Street will negate travel time benefits gained from travel on the Managed Lane facility itself. The Analysis should explore how traffic congestion at these points could be alleviated (at least for mass transit vehicles) in order to enhance the overall performance of this Alternative as a transit guideway.*

Parsons Brinckerhoff made no discernible effort to apply its engineering competence and ingenuity to the question of ingress and egress for the Managed Lane Alternative in the Alternatives Analysis.

In his letter to the City, copied to the Federal Transit Administration (FTA), Dr. Panos Prevedouros, Professor of Traffic Engineering at the University of Hawaii, Chair of the Transportation Research Board's Highway Micro-simulations Committee and himself a member of the Task Force, commented,

> *"... the most egregious violation of FTA's rules on alternative specification and analysis was the deliberate under-engineering of the Managed Lanes Alternative to a degree that brings ridicule to prevailing planning and engineering principles."*[45]

Dr. Prevedouros in his micro-simulation studies of differently designed entry and exit ramps for the Managed Lane Alternative shows that with properly designed ramps[46] traffic congestion can be reduced and excessive traffic congestion would not occur even during peak-hour traffic.

f) The City's lack of due diligence

The Task Force consisted of seven individuals to advise it on the Alternatives Analysis. Kazu Hayashida, a former Director of the Hawaii Department of Transportation (HDOT), was appointed Chairman.

In turn, the Chairman appointed two members to be a Technical Review Subcommittee to review construction costs. One had been a long time senior employee of the Hawaii State Department of Transportation (HDOT) and the other was the recently retired Director of Honolulu's City Department of Transportation Services and a former HDOT Director. Neither one had the expertise to judge construction costs in detail especially for a project of this magnitude and complexity.

After the Subcommittee's first report to the Task Force that they believed the projected Managed Lane Alternative costs in the Alternatives Analysis to be reasonable, we asked the subcommittee members for a list of the companies they had contacted. We believed there needed to be a detailed reconciliation between the Tampa Expressway cost (less the design error) of $320 million and the Parsons Brinckerhoff estimate of $2.6 billion for the Managed Lane Alternative. They told us they had only talked to the local office of Parsons Brinckerhoff, which had produced the projections, and had been assured that the cost estimates were reasonable.

They talked subsequently to engineers at the Hawaii Department of Transportation who told them that the 36-foot wide Managed Lane Alternative would need eight-foot supporting piers, totally ignoring the fact that the 59-foot wide Tampa Expressway has only six-foot piers. They mention that most agencies on the Mainland use $100 to $200 per square foot to price elevated highways but since they had not talked to Figg Bridge they would not know that they quote slightly less

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[44] Attached as Appendix B.
[45] www.honolulutraffic.com/NEPAScopingReport.pdf p. A-180
[46] http://www.honolulutraffic.com/UHCS_Report41.pdf p. 39.

than $100. Meanwhile they say that the State DOT uses $400-$500 per square foot but gives no sensible explanation of why that should be.

A project involving billions of dollars should be expected to receive reasonable due diligence on the part of the City Council's Task Force. To the contrary, there was little, if any, performed.

Accordingly, we suggested a consultation with the Tampa Expressway Authority and with PCL Construction Services, Inc., which had built both the Tampa Expressway and the Hawaii Convention Center, and maintained offices in both Tampa and Honolulu and would be familiar with the costs and construction difficulties in both cities.

We also suggested they contact the Figg Bridge Company who had designed the Tampa Expressway incorporating its new low-cost construction methodology. One of the subcommittee members made a single, short phone call to the Tampa Expressway Authority; no one contacted PCL or Figg Bridge.

Dr. Martin Stone, AICP, Director of Planning, Tampa-Hillsborough Expressway Authority, whose project won the International Bridge, Tunnel and Turnpike Association's 2007 Award for the Best Toll Operations Project in the World, told them that the City's cost estimate was too high but they obviously did not follow up with that.

When one considers that Parsons Brinckerhoff maintains its national bridge practice in Tampa and actually designed a part of the Tampa Reversible Express Lanes project one would think that they should have been contacted also but it is our understanding that they were not. The Subcommittee report was made part of the Task Force Final Report.[47]

The Task Force Final Report makes it clear that there was inadequate study of the Managed Lane Alternative.

> *"... the Alternatives Analysis should have presented variations on the Managed Lane Alternative that could make this alternative more attractive. Appendix 3 contains suggestions for fleshing out possible variants of the Managed Lane Alternative."*[48]

The Report's Appendix 3, "*Suggestions for further development of the Managed Lane Alternative*," written by the former Chief Counsel of the USDOT's Volpe Center, David Glater, acting as the Transportation Analyst for the Task Force, concurs in finding an under-engineering of the Managed Lane Alternative by producing the list of suggested modifications attached as our Appendix B.[49] From this it is obvious that Mr. Glater anticipated these modifications to be adopted in the Draft EIS process.

The City and Parsons Brinckerhoff ignored these and all other the recommendations of the Task Force regarding the Managed Lane Alternative and omitted from the Draft EIS any mention of the Task Force, or its Final Report, or the highly relevant questions it posed..

We believe this cavalier attitude on the part of the City regarding due diligence violates the rule that,

> *The Council on Environmental Quality (CEQ) requires the data and analyses in an EIS are commensurate with the importance of the impact.*[50]

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47 www.honolulutraffic.com/TaskForceReport.pdf
48 Task Force Final Report. p. 4/7
49 www.honolulutraffic.com/TaskForceReport.pdf pp. A-32 to A-33. Appendix 3 also attached as our Appendix B
50 40CFR1502.15

Subsequent to the Alternatives Analysis process, a micro-simulation study undertaken by Dr. Prevedouros and his students concluded that,

> *[The Managed Lane Alternative] would reduce H-1 congestion by 35%, reducing drive times from 4 to 22 minutes. An express bus commuter would make the same trip in 12.7 minutes. The greatest benefit of HOT lanes would accrue to those who never use them; they would pay no added taxes or tolls yet would experience dramatically reduced congestion.* [51]

g) Summary of the case for reinstating the Managed Lane Alternative in the EIS:

> *Methodology and scientific accuracy. Agencies shall insure the professional integrity, including scientific integrity, of the discussions and analyses in environmental impact statements. They shall identify any methodologies used and shall make explicit reference by footnote to the scientific and other sources relied upon for conclusions in the statement. An agency may place discussion of methodology in an appendix. (40CFR1502.24)*[52]

The Draft EIS and its accompanying technical memoranda offer no evidence that the City and Parsons Brinckerhoff ever undertook to "*rigorously explore and objectively evaluate*"[53] the Managed Lane Alternative as required by NEPA.

> *Environmental impact statements shall be concise, clear, and to the point, and shall be supported by evidence that agencies have made the necessary environmental analyses.* [54] *(emphasis added)*

We ask that the FTA require the City re-assess the Managed Lane Alternative in a Supplementary Draft EIS using a less "client focused" and more independent consultant. Such an independent re-evaluation should perform the following:

1. The requisite due diligence a project of this magnitude warrants.
2. Have qualified cost estimators reconcile and document in detail the difference between the City's Managed Lane Alternative cost projections and the actual costs of similar facilities in Florida and determine the reasons for the differences between them.
3. Project the outcome of using three-lanes rather than two for all or part of the facility.
4. Project the outcome of distributing Koko-Head bound traffic by way of egress ramps in a manner similar to that shown in Professor Prevedouros' UHCS study.
5. Project the outcome of following the suggestions made in Appendix 3 of the Task Force Report.

If this is done the EIS will meet the requirements of this particular directive:

> *During the draft EIS stage all reasonable alternatives, or the reasonable range of alternatives, should be considered and discussed at a comparable level of detail to avoid any indication of a bias towards a particular alternative(s).*[55]

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51 *Transportation Alternatives Analysis for Mitigating Traffic Congestion between Leeward Oahu and Honolulu: A Detailed Microsimulation Study* (UHCS Study) Directed by Professor Panos D. Prevedouros with the Participation of Undergraduate and Graduate Students Specializing in Transportation Studies. University of Hawaii. 2008.

52 http://edocket.access.gpo.gov/cfr_2008/julqtr/pdf/40cfr1502.24.pdf

53 40CFR1502.14

54 40CFR1500.2(b)

55 http://www.environment.fhwa.dot.gov/projdev/tdmalts.asp

In addition the U.S. Secretary of Transportation has responsibilities under 49USC5309(d)(3),

> *... for a major capital investment grant, the Secretary shall analyze, evaluate, and consider*
>
> *(A) the results of the alternatives analysis and preliminary engineering for the proposed project;*
>
> *(B) the reliability of the forecasting methods used to estimate costs and utilization made by the recipient and the contractors to the recipient;*

The Alternatives Analysis was legally insufficient and without a reinstatement of the Managed Lanes Alternative and a more rigorous and scientific assessment of its benefits in a Supplementary Draft EIS, how can the Secretary possibly make a reasoned judgment?

The importance to the people of Honolulu of thoroughly evaluating all reasonable alternatives as required by NEPA is that one or more of the alternatives may offer an opportunity at reasonable cost to provide mobility without needing to construct an elevated rail line along the Honolulu waterfront and through the center of town.

> *(e) Use the NEPA process to identify and assess the reasonable alternatives to proposed actions that will avoid or minimize adverse effects of these actions upon the quality of the human environment.*[56]

Virtually all of Hawaii's environmental organizations are opposed to elevated rail running through the core of the city of Honolulu with all the concomitant visual blight and noise disturbances that it brings. We need to avoid such an environmental disaster if at all possible.

2. Use of the 2003 BRT Project

With some fairly minor modifications the 2003 Bus/Rapid Transit Project, as fully described in the July 2003 Final Environmental Impact Statement,[57] is a "reasonable alternative" that should have been considered in the current Draft EIS since with its projection of 313,000 daily linked trips, it was forecasting higher ridership than the current rail project for less than $1 billion in capital costs.[58]

The State's objection at that time to the Regional segment of the Project appears to have evaporated since they have been recently considering changes to H-1 similar to those contemplated in the 2003 FEIS.

Objections to the In-Town segment could easily be mitigated by adoption of the King/Beretania transit couplet described in Dr. Prevedouros' UHCS study. The In-town segment's time savings for the Downtown to Waikiki trip projected in the 2003 FEIS were inconsequential and should not affect the project's overall cost-effectiveness.

3. The EZway Plan

The basic goals of the EZWay plan are to provide:

a) Substantial congestion relief largely caused at the H-1/H-2 and H-1/Moanalua freeway merges by adding critical high occupancy capacity,
b) Express bus mass transit primarily in the west Oahu to downtown corridor.
c) Traffic relief at other major congestion spots in Honolulu; and,
d) Express transit connections to the University of Hawaii at Manoa.

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[56] http://www.nepa.gov/nepa/regs/ceq/1500.htm §1500.2(e)
[57] http://www.honolulutraffic.com/feis_all_files.pdf
[58] http://www.honolulutraffic.com/feis_all_files.pdf p. 34.

The EZWay plan extends the transit service requirement of rail by providing a wider coverage, combines strong elements of managed lanes without the use of tolls, and takes advantage of the extensive experience of running bus public transit on Oahu and the Regional BRT plan of 2001-2003. The basic elements of the plan are outlined below and discussed in brief.

The EZWay consists of:

1. three elevated reversible lanes from the H-1/H-2 merge to Iwilei, with a priority BRT from downtown to the UH,
2. express buses having exclusive use of freeway shoulders in order to travel at near free flow speeds from/to the EZWay,
3. a downtown underpass for efficient downtown traffic distribution, and
4. a new Auahi Street transit center for west Oahu bus passenger distribution to Kakaako, Ala Moana and Waikiki.

(1) The EZWay structure is a fully managed expressway facility that can be described as three reversible elevated zipper lanes starting at the H-1/H-2 merge and terminating at Pier 16 with off-ramps at Aloha Stadium/Pearl Harbor, Lagoon Drive and Waiakamilo Street. The right lane is an exclusive bus lane throughout the length of the facility. At Iwilei, one elevated lane goes to Hotel St. to connect with King/Beretania BRT (University spur BRT). University BRT runs on priority lanes and with priority signaling along King and Beretania Streets.

The EZWay will open with a minimum occupancy requirement of three people per vehicle. This requirement may be increased in the future to avoid congestion. No tolls will be collected. Automated steep fines applied to low occupancy violators. No trucks allowed at any time. Open to all emergency vehicles at all times. Open to green vehicles with greater than 35 mpg EPA highway fuel consumption. This threshold is also subject to change in order to maintain at least 50 mph speeds in peak periods. Therefore, usage on the EZWay is controlled macroscopically, by occupancy and fuel efficiency requirement, rather than microscopically by electronically incrementing tolls.

(2) Kapolei and Ewa Beach Bus Rapid Transit (BRT) connectors to Waipahu: Hybrid or fuel cell buses will be allowed to use shoulders on on-ramps and a few elevated passages or priority lanes at intersections (queue jumpers) which allow them to get by chronically congested spots. Includes a Waipahu (Farrington Hwy.) on-ramp to/from the EZWay.

Express buses from Waianae and Makakilo may use upgraded H-1 freeway shoulders to get to the EZWay quicker. The same priority treatment applies to express buses from Mililani and Wahiawa.

(3) Ala Moana Blvd. Downtown Underpass (mini-tunnel) starting east of River Street and ending both at Alakea Street and Halekauwila Street. Same tunnel reverses in the PM period from Halekauwila Street and Bishop Street to Nimitz Hwy. contraflow lane onto the elevated zipper lanes. The underpass may continue to large new parking lot(s) east of Punchbowl Street. As a result, a large portion of vehicular traffic may "disappear" from downtown by going from the EZWay, through the mini-tunnel directly into a parking structure, one block east of Punchbowl Street.

(4) New Ward Centers bus terminal on Auahi Street. Express buses that arrive from the EZWay stop at this terminal and either return to origin, or continue as regular bus to Ala Moana Center. Contracted tour buses may be deployed at this terminal for direct worker distribution to Waikiki hotels.

Appendix A

Ours and the City's projected costs for the Managed Lanes Alternative versus the Tampa Expressway and the H-3 Freeway — in millions of dollars.

Tampa Expressway			
	Cost index		
2001	144.8	$320.0	original cost
2006	221.3	$489.1	inflated using construction cost index
+32%		$645.6	to allow for Florida/Hawaii cost change
	length	14.0	Miles
		$46.1	Cost per mile
	Lanes	2.4	
		$19.2	Cost per lane/mile based on 2 lanes

H-3 Freeway			
Year	Cost Index	Real cost	
1991	107.5	$1,300	Original Cost
2006	221.3	$2,676	Allowing for Construction inflation
	Length	16.1	Miles
		$166	Cost per mile
	Lanes	4	
		$42	Cost per lane mile

City's Managed Lane Alternative projected cost			
Year		Real cost	
2006		$2,572	
	Length	16	miles
		$161	Cost per mile
	Lanes	2	
		$80	Cost per lane mile

Honolulutraffic.com Managed Lane Alternative projected cost			
Year		Real cost	
2006		$900	
	Length	12	miles
		$75	Cost per mile
	Lanes	2	
		$38	Cost per lane mile

Adjusted cost per lane-mile	
Facility	$millions
Tampa Expressway	$19.2
H-3 Freeway	$42.0
Our MLA estimate	$38.0
City's MLA	$80.0

All construction cost inflation is corrected using the PRICE TRENDS FOR FEDERAL-AID HIGHWAY CONSTRUCTION available at:

Appendix B

TRANSIT ADVISORY TASK FORCE

c/o Honolulu City Council
530 S. King Street, Room 202
Honolulu, HI 96819
Phone: (808)523-4139

Appendix 3

Suggestions for further development of the Managed Lane Alternative.

- The Alternatives Analysis' description of the characteristics of the Managed Lane Alternative should provide more complete information as to mass transit operations utilizing this facility. The Alternatives Analysis States that new express and other bus transit routes would be developed for operation on the Managed Lane facility. (p. 2-4) A fuller development and presentation of the transit services that would accompany the Managed Lane Alternative would be helpful (e.g., routes, new/existing stations). There is no description in the Alternatives Analysis of any proposed supportive operational practices off of the Managed Lane facility that would complement the facility's use as a transit guideway, e.g., transit stations connected to park-and-ride facilities, reserved lanes for transit vehicles on existing streets, traffic signal priority for transit vehicles.

- In its discussion of travel time benefits of the Managed Lane options, the Alternatives Analysis projects that traffic congestion at both the H-1 Freeway access to the Managed Lane facility and at the Nimitz Highway exit at Pacific Street will negate travel time benefits gained from travel on the Managed Lane facility itself. The Analysis should explore how traffic congestion at these points could be alleviated (at least for mass transit vehicles) in order to enhance the overall performance of this Alternative as a transit guideway.

- The description of the Managed Lane Alternative in Chapter 2 of the Alternatives Analysis states "The H-1 zipper lane would be maintained in the Two-direction Option but discontinued in the Reversible Option." (p. 2-4). However, no explanation is provided as to why the zipper lane would not be continued in the Reversible Option. The Managed Lane Reversible Option's addition of two Koko Head-bound elevated lanes for the morning commute appears to result in a net increase of only one lane if the inbound zipper lane were removed.

- The foldout photographic plans presenting the Managed Lane Alternative (Alternatives Analysis, Figures 2 - 1 and 2 - 2) do not clearly depict the ramp lanes necessary to access the Managed Lane facility from Interstate Highways H-1 and

H-2 in both the Two-direction Option and the Reversible Option, or the ramp lanes necessary to exit from the facility to these Interstate Highways.

- These plans show an approximately one-mile long "facility" in the vicinity of Kaonohi Street (Figure 2 -1), and another in the vicinity of Radford Drive (Figure 2 -2), however no description of these facilities is provided. In discussions with DTS Administration staff, these facilities have been identified as transit stations with attendant deceleration and acceleration lanes. Assuming this to be the case, it would be helpful to see the proposed location(s) of park-and-ride facilities planned near these stations, comparable to the information presented in Table 3 - 5, with respect to the Fixed Guideway Alternative. It is not apparent whether the stations would operate in both the Two-direction Option and the Reversible Option. What are the cost implications of adding access/exit ramps for transit vehicles instead of building elevated transit stations?

- Figure 2 -2 shows a small section of the Managed Lane facility approximately 2000 feet Koko Head of the end of the facility at Nimitz Highway/Pacific Street. This component of the Managed Lane facility is not explained. Is it an elevated structure or at-grade? Which Managed Lane users would be allowed to access it?

- Figure 2 - 1 shows two ramps in the vicinity of Aloha Stadium. It is not clear whether these ramps would be available in both the Two-direction Option and the Reversible Option, or whether these ramps would be available to other than transit vehicles (e.g., to vans, three-person and two-person automobiles, and/or single-occupant automobiles paying tolls).

See also Financing Committee's report discussing changes in permitted access to the Managed Lane facility that might make the facility eligible for New Starts and/or GET ½% surcharge funds.

February 6, 2009

Part II — Insufficient consideration of elevated rail impacts

> *Use all practicable means, consistent with the requirements of the Act and other essential considerations of national policy, to restore and enhance the quality of the human environment and avoid or minimize any possible adverse effects of their actions upon the quality of the human environment. 40CFR1500.2.*[1]

At the heart of this issue is that of the environmental harm of an elevated rail transit line thirty feet wide at an average of 35 feet elevation accommodating trains every 1½ minutes (three minute intervals in both directions) during the peak commuting time and three minutes at other times traversing the entire center of urban Honolulu including the waterfront.

The effect of elevated rail on the built environment has not been adequately addressed in the Draft EIS. The following requirement that there be discussions about the built environment is not fully addressed.

> *Urban quality ... and the design of the built environment including the reuse and conservation potential of various alternatives and mitigation measures.*[2]

Many environmental organizations have gone on record as being opposed to such an elevated structure. The following are some quotes from their recent statements on elevated rail:

> ***Outdoor Circle:*** *The lack of specific descriptions of how to overcome the visual misery that will be heaped upon the O'ahu landscape leaves our organization with little confidence that damages to the visual environment can or will be mitigated as the project moves forward ... Of equal concern to The Outdoor Circle is the pending fate of literally hundreds of street trees. Honolulu has fostered a worldwide image of being a city full of beautiful trees. It's an important part of Honolulu's appeal to both residents and visitors ... The Outdoor Circle believes the City has deceived the public about the visual impacts the project will have on our communities and our quality of life.*
>
> ***Historic Hawaii Foundation:*** *The proposed Honolulu Transit Corridor project will have a dramatic impact on the landscape of the island of O'ahu; this includes not only the direct impact to specific parcels, but primarily the visual effect on the landscape and historic resources. HHF is concerned that the Draft EIS does not accurately take into account these larger impacts, but rather focuses on those adverse effects caused by the direct taking of land.*
>
> ***Hawaii's Thousand Friends:*** *Elevated fixed rail routes will negatively impact the established landscape of Honolulu and significant view planes makai to mauka ...The rail line will be the ugly and block views with concrete rail beds 30-feet wide supported by pillars that are 35-40 feet high and six feet in diameter spaced at 150 feet intervals.*
>
> ***Hawaii Architects position:*** *... the proposed elevated rail structure will block mauka and makai view corridors particularly along Nimitz Highway through historic Chinatown and Downtown ... Elevated rail stations and structures along the waterfront will make a poor situation worse by introducing an additional physical and visual barrier ... We are concerned that the areas below elevated rail structures and stations will become*

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1 http://www.nepa.gov/nepa/regs/ceq/1500.htm §1500.2(f) See also 49 USC 5301(e) and 42 USC § 4321
2 40CFR1502.16(g)

AR00002037

> *blighted, "nuisance" environments and that the lack of natural public sightlines into stations will diminish safety and security for passengers waiting on platforms. The proposed elevated platforms and concourses will also impede convenient access for both able-bodied and disabled users.*

We believe that elevated rail violates the Oahu General Plan, which states, in part, we must,

> *Protect Oahu's scenic views, especially those seen from highly developed and heavily traveled areas & Locate roads, highways, and other public facilities and utilities in areas where they will least abstruct important views of the mountains and the sea.*[3]

We believe there has been inadequate consideration of the detrimental effects of elevated rail. What has happened in other communities that once had an El, such as New York's 3rd Avenue El? What are the detrimental impacts of the elevated sections of Miami's Metrorail and San Juan's Tren Urbano? What happened in San Francisco when they removed the Embarcadero Freeway segment?[4]

It should be noted that the Managed Lanes Alternative and the other suggestions for alternatives, the 2003 Bus/Rapid Transit proposal, and the EZWay plan, do not propose any elevated structures through the urban core or in residential areas or along the waterfront. We believe that had these other alternatives been objectively studied as required by NEPA that one of them would have been the "environmentally preferable alternative."

> *The environmentally preferable alternative is the alternative that will promote the national environmental policy as expressed in NEPA's Section 101. Ordinarily, this means the alternative that causes the least damage to the biological and physical environment; it also means the alternative which best protects, preserves, and enhances historic, cultural, and natural resources.*[5]

As was also commented on by the Corps of Engineers:

> *... the overall project purpose is used for evaluating practicable alternatives under the Guidelines, which require that if the overall purpose of a project is practicably met through several alternatives, the Corps can only authorize the least environmentally damaging practicable alternative.*

City renderings misrepresent reality

We asked a professional commercial artist with experience in streetscape renderings to comment on those renderings shown in the Draft EIS on pages 4-65 through 4-84. Following are their comments:

> *In nearly every rendering, the cast shadows have been deemphasized, making the project appear much less impactful. They show shadows, but do not show the correct size and extension to match the existing shadow reach (shown by other objects in the photo), or especially darkness. This has a significant psychological effect, and they use it to the extreme.*
>
> *The shadows on the structures themselves have also been deemphasized to give the appearance of blending into the scene, which is also a distortion. They make extensive*

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3 Oahu General Plan, III, Objective B, policies 2 & 3. http://honoluludpp.org/planning/GeneralPlan/GP3.pdf

4 NEPA implementing regulations provide that "[e]nvironmental impact statements shall be concise, clear, and to the point, and shall be *supported* by evidence that agencies have made the necessary environmental analyses" (40 C.F.R. § 1500.2(b)) [emphasis supplied].

5 Council on Environmental Quality's 40 Questions and Answers. http://ceq.hss.doe.gov/nepa/regs/40/1-10.HTM 6(a)

use of a 'white' concrete appearance. Is that a correct material they will use? Even if so, the shadows will be significantly more prominent.

Their choice of view locations/angles is carefully done, of course.

The width of the guideway and its vertical thickness are smaller than what the actual plans call for. Many of the support columns are quite obviously slimmer than they should be.

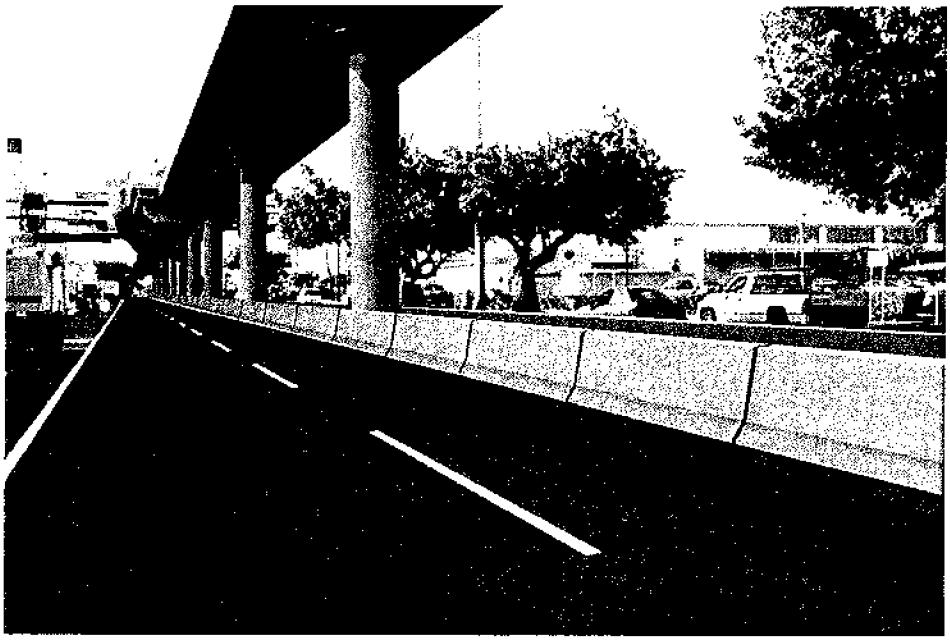
They are showing support columns on thin grassy strips of median with virtually no 'buffer' between the median curb and the pillar itself. That is not legal.

One of the Dillingham shots (DEIS, fig 4-27) shows a pillar resting directly in the right turn lane. I'm thinking that may be a no-no.

These also do not properly indicate the foliage that will be removed.

The Dillingham shot similar to our rendering talks about trees 'softening' the visual impact, but they don't mention the trees that will be removed on the Mauka side of the street. The angle they use disguises it. The Fort Street Mall shot is a joke. They positioned the shot to put as many trees as possible in the view line.

The photos and renderings on the following pages illustrate our concern with the impacts of elevated rail along the waterfront and through the center of Honolulu:



Our artist carefully calculated the appropriate support column and rail bed widths and added the barriers necessary to protect the support piers. The City's version is below and the differences are obvious; the dimensions are smaller and the structure appears less intrusive. On all City renderings (Draft EIS pp. 4-65 to 4-84), the environmental impacts are deliberately minimized.

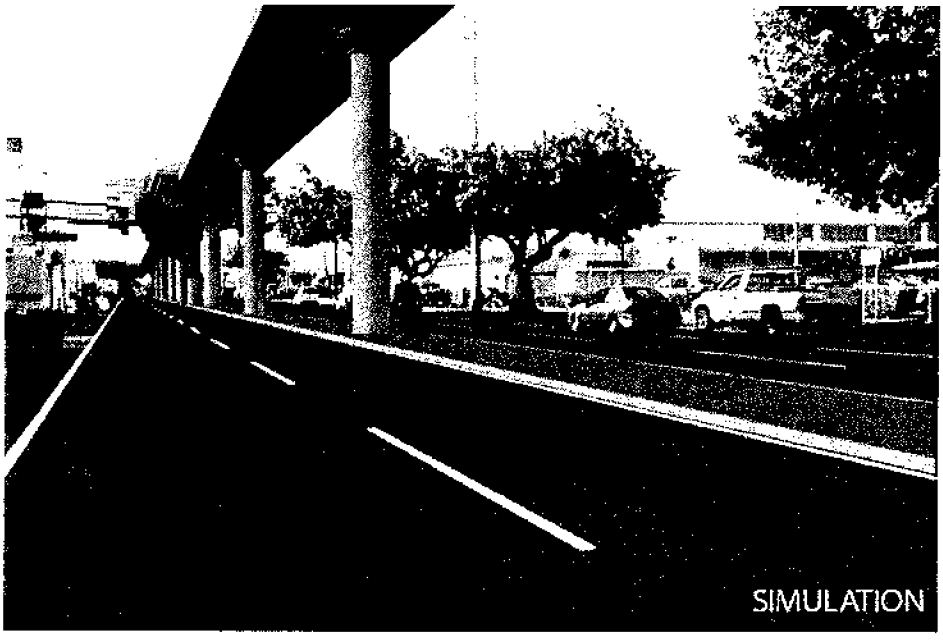
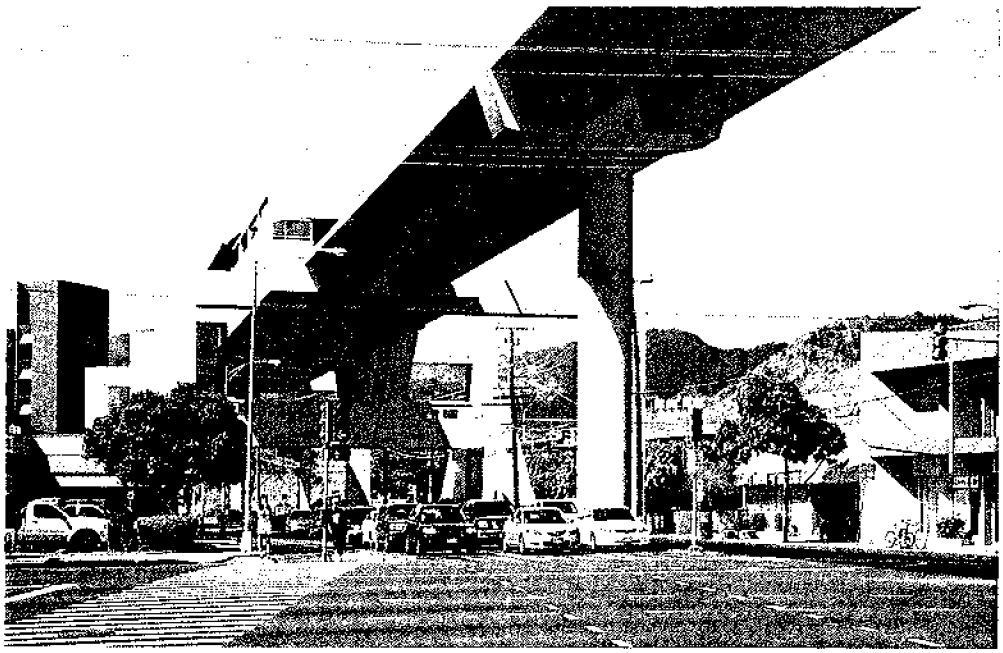
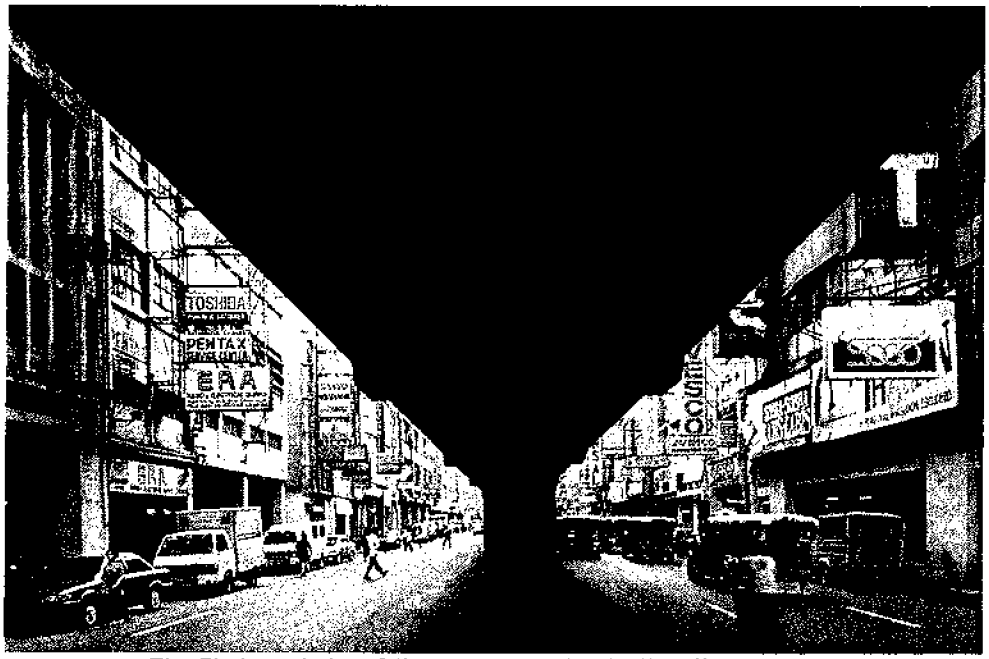


Figure 4-28 Viewpoint 12—Dillingham Boulevard near Honolulu Community College and Kapālama Station Area, looking 'Ewa

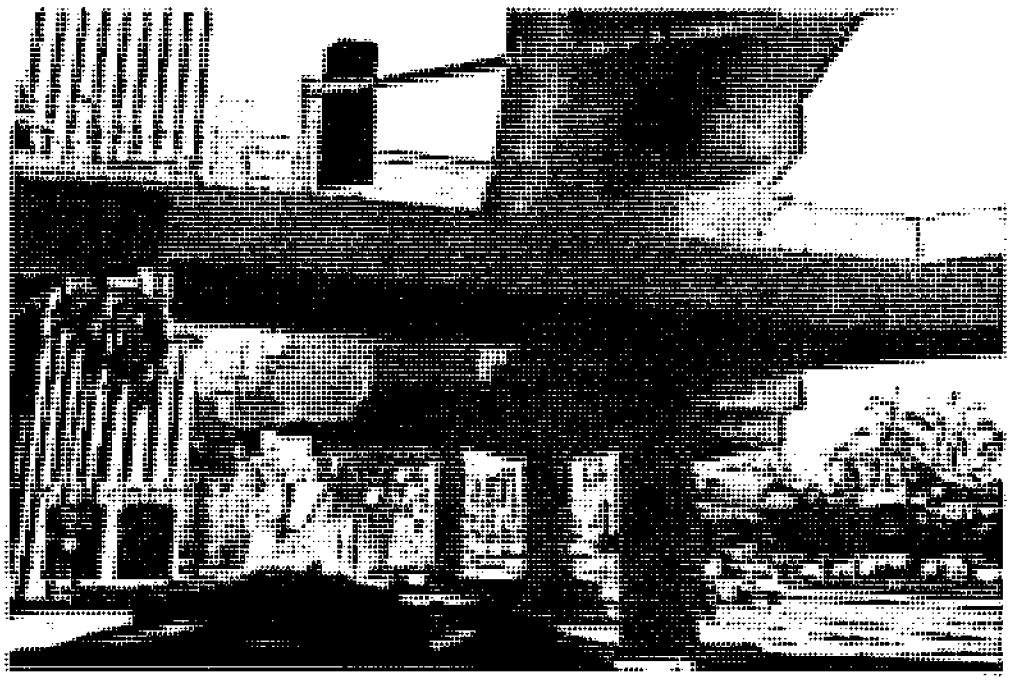


Our artist's rendering of the Varsity Station on University Avenue looking mauka.

Our artists rendering of the sound mitigation panels to be used along Dillingham Blvd.



The City's renderings fail to convey overhead rail's effects on light.



The Aloha Tower station from the City's video of it available on their website.

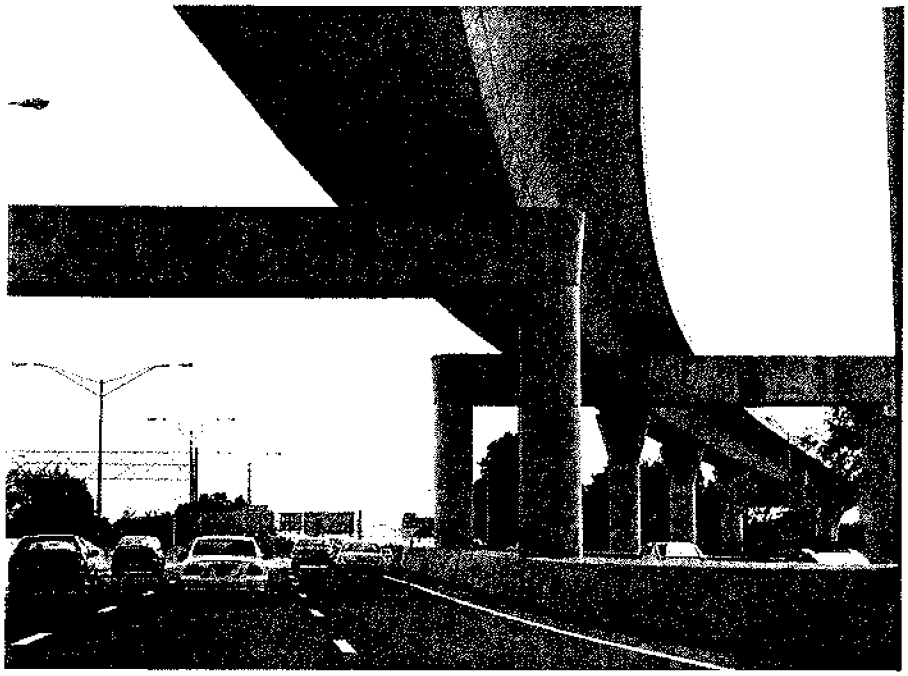


Photo of straddle bent supports under a New York highway. Notice that in the City rendering below how the sheer ugliness of straddle bent supports is minimized.

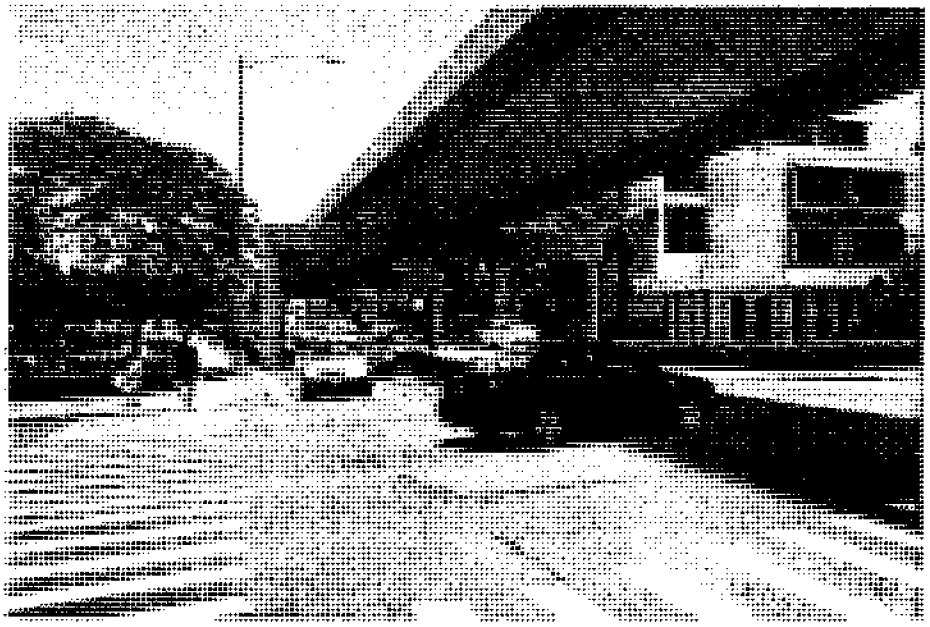


Figure 4-36 Viewpoint 20—Mother Waldron Park near Halekauwila Street/Cooke Street Intersection, looking Ewa

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Part III — The Locally Preferred Alternative must be studied in the EIS

> *Proposals or parts of proposals which are related to each other closely enough to be, in effect, a single course of action shall be evaluated in a single impact statement.*[1]
>
> *A problem of "segmentation" may also occur where a transportation need extends throughout an entire corridor but environmental issues and transportation need are inappropriately discussed for only a segment of the corridor.*[2]

As stated in Bill 79 (2006)[3] and Ordinance 07-001:

> *The locally preferred alternative for the Honolulu High-Capacity Transit Corridor Project shall be a fixed guideway system between Kapolei and the University of Hawaii at Manoa ... with the Waikiki branch ... The city administration is authorized to proceed with preparation of an environmental impact statement for the locally preferred alternative (LPA)*

Resolution 07-039 defines a shortened minimum operable segment between East Kapolei at the University of Hawaii-West Oahu, near the future Kroc Center, and Ala Moana Center.

The second and last Scoping Report, p. 5-3, states clearly that:

> *Both UH Mānoa and Waikīkī service are included in all fixed guideway alternatives that will be evaluated in the EIS.*

However in the Draft EIS, the detailed environmental analysis and documentation applies only to the core 20-mile alignment between East Kapolei and Ala Moana Center. The additions from East Kapolei to West Kapolei and from Ala Moana Center to UH Mānoa and to Waikīkī are described as "future planned extensions."

The Locally Preferred Alternative should be examined in the EIS in its entirety as was intended by both Notices of Intent and authorized by the City Council. The three "planned extensions" should not have been segmented from the Locally Preferred Alternative in this Draft EIS.

As the Corps of Engineers commented for the second Scoping Report, A-10,

> *The Corps believes the environmental consequences resulting from construction of the "Minimal Operable Segment" and all planned extensions must be considered in the project-level EIS, particularly if the Project [meaning the LPA] benefits, wholly or partially, are derived from one or more of these future extensions and station locations.*[4]

We believe that segmentation of what was formerly the Locally Preferred Alternative into a newly designated "Project" (formerly the Minimum Operable Segment and later the First Project) and "planned extensions" was surreptitiously undertaken to avoid the following FTA policy.

> *... the Federal 'undertaking' in a Fully Funded Grant Agreement (FFGA) will no longer be segmented into Project and Local Activities. All activities related to a Federal undertaking will be identified as the Federal Project. The Federal funds will be distributed among all the activities in the project at a level funding ratio equal to the*

1 40CFR1502.4[a]
2 http://www.fhwa.dot.gov/environment/alts.htm
3 http://www.honolulutraffic.com/Bill79Final.pdf
4 Corps of Engineers comments, Second Scoping, App. A-1, p. A-6, at: www.honolulutraffic.com/NEPAScopingReport.pdf

> *percentage of Federal financial participation in the entire project. Thus, all the elements and activities of the project, as described in the FFGA will be funded, in part, with Federal funds; and, the requirements attached to the use of Federal funds will apply to each such task, unless otherwise exempted as provided in the applicable laws, regulations and policies.*[5]

Not segmenting the original Locally Preferred Alternative would mean that the City would get far less federal funds for the Minimum Operable Segment and make the MOS even more financially untenable than it is already (see Discussion of Finances).

The lack of any credible rationale in the Draft EIS for the City's segmentation of the "planned extensions" from the LPA intimates that the segmentation was done to facilitate funding and acceptance of the Draft EIS since cost and environment issues for the extensions to UH Manoa and Waikiki are proportionally greater than for the Minimum Operable Segment.

These combined segments of the project are intended to provide approximately 30 miles of unified rail transit line. The cost and environmental impacts of the integrated project will be significantly greater than the isolated Minimum Operable Segment or "Project" that is specified.

The UH Manoa and Waikiki extensions will traverse the core urban center of Honolulu creating significant cumulative environmental impacts including prolonged lifestyle disruption due to construction difficulties, excavation of culturally sensitive areas, severe noise impacts through close-quartered residential neighborhoods resulting in great emotional distress, impossible to mitigate visual impacts, and negative impacts on property values within close proximity to the rail line.

> *When several foreseeable similar projects in a geographic region have a cumulative impact, they should be evaluated in a single EIS.*[6]

Like the two sections of the Winston-Salem beltline at issue in North Carolina Alliance, the three remaining sections of the Locally Preferred Alternative,

> *... constitute cumulative actions, and therefore should [be] considered in the same environmental impact statement.*[7]

The *de minimus* discussion of cumulative impacts of the planned extensions in the Draft EIS do not justify segmentation of the Locally Preferred Alternative under NEPA. This segmentation has occurred because of funding considerations and the arguments found in the Draft EIS are merely post-hoc rationalizations for this funding-driven violation of the law.

The Draft EIS violates both NEPA and the FTA regulations because it fails to consider the fully detailed cumulative actions of the Minimum Operable Segment and the "planned extensions" in a single Environmental Impact Statement, because these sections were segmented due to funding considerations rather than the NEPA criteria.

The Draft EIS, p. 2-41, states that,

> *The Ala Moana Center and Convention Center Stations would be transfer points between the UH Mānoa and Waikīkī branch lines.*

This raises innumerable question about how this would all work and what would be the impacts. For example, the engineering drawings[8] show that the planned extension to UH would entail

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5 http://www.fta.dot.gov/funding/thirdpartyprocurement/bppm/grants_financing_6105.html

6 Resources, Ltd. v. Robertson, 35 F.3d 1300, 1306 (9th Cir. 1993), quoted in North Carolina Alliance for Transportation Reform v. U.S. Dept. of Transportation, 151 F. Supp. 2d 661, 685 (M.D.N.C. 2001).

7 151 F.Supp. 2d at 684.

8 Draft EIS, Appendix A, Sheet RP024.

adding a branch line in the vicinity of the junction of Queen and Waimanu Streets. This would likely near double the width of the rail bed. The drawings also show that these two rail lines cross over one another at Piikoi and Kona Streets with one line continuing at the 35 feet level and the one above at 65 feet. This may be an even greater eyesore than was in the original plan.

How are the two Ala Moana stations going to work? And how are the promised three minute headways to be maintained with these future extensions.

Further, if Ala Moana Center and the Convention Center are transfer points to Waikiki and UH Manoa, how will that work environmentally? If UH Manoa and Waikiki are also to have service every three minutes, how is that going to work with three separate lines — Ala Moana only line, UH Manoa line and Waikiki line — in operation?

Is the lower Ala Moana Station to be torn down and replaced by the originally contemplated higher one? Or is it that the structures at Ala Moana Center present insurmountable engineering difficulties and that the City has no plan to ever build beyond Ala Moana Center?

Or is it that the "planned extensions" could not possibly pass the FTA's cost-effectiveness test? It is obvious that the "planned extensions," which would require a separate EIS,[9] would not come close to meeting the cost-effectiveness requirements.

In another significant omission, the Draft EIS does not give total transit boarding or trip data for the various rail alternatives, only Fixed Guideway Boardings.[10] However, according to the Alternatives Analysis the greatest transit ridership generated of all the rail alternatives is 294,100 versus 281,900 for the 20.7 mile MOS. That is a mere 4.5 percent increase in ridership requiring a 25 percent increase in capital costs, again according to the Alternatives Analysis.

Frankly, failing a coherent plan that addresses these issues, we are presently inclined to believe that Ala Moana Center is the final terminus and there may well be no real intent to build the "planned extensions."

Had the City Council and the public been aware of this segmentation at the time of the Alternatives Analysis and Scoping, the public responses may well have been very different. For example, the Managed Lane Alternative would have been considered more useful if there was to be no direct rail connection to UH Manoa.

In addition, the Minimum Operable Segment will have almost no impact on residential property in the dense urban areas whereas the planned extensions to UH Manoa and Waikiki will have significant adverse impacts on high rise condominiums, hotels, and family dwellings.

For all these reasons the Locally Preferred Alternative should be examined in the EIS in its entirety as was intended by both Notices of Intent and authorized by the City Council and as required by law.

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[9] Draft EIS, 2-41.
[10] Draft EIS, Table 3-28.

February 6, 2009

Part IV — First Project, Phase I, is an illegal segmentation.

> *Agencies shall not commit resources prejudicing selection of alternatives before making a final decision. 40CFR1502.2[f].*

The Locally Preferred Alternative is a major federal action. To have the First Project, Phase I, East Kapolei to Pearl Highlands, under construction before such time as the City is granted a Full Funding Grant Agreement, or even a Record of Decision, or being given a Letter of No Prejudice[1] clearly violates federal regulations on evaluating environmental impacts (23 CFR 771.111(f)), which require that:

> *In order to ensure meaningful evaluation of alternatives and to avoid commitments to transportation improvements before they are fully evaluated, the action evaluated in each environmental impact statement (EIS) or finding of no significant impact (FONSI) shall:*
>
> *Connect logical termini and be of sufficient length to address environmental matters on a broad scope;*
>
> *Have independent utility or independent significance, i.e., be usable and be a reasonable expenditure even if no additional transportation improvements in the area are made; and*
>
> *Not restrict consideration of alternatives for other reasonably foreseeable transportation improvements.*

To build Phase I prior to receipt of a Letter of No Prejudice would violate the regulations. Connecting East Kapolei to Pearl Highlands where the first three of the six stations are in open fields[2] is not exactly connecting *"logical termini"* especially as the Kapolei terminus and the next two stations are in open fields, and where for the last half of its six-mile length is in an area of low population density.[3]

While the Phase I costs, ridership and cost-effectiveness are not detailed in the Draft EIS, it is obvious that it cannot possibly have *"independent utility or independent significance."*

For these reasons, the construction of Phase I would be an illegal segmentation.

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1 Spot Report #2, PE Entry Readiness Report, on HHCTCP by Booz Allen, October 2008.
2 See video http://www.honolulutransit.com/video?id=14

February 6, 2009

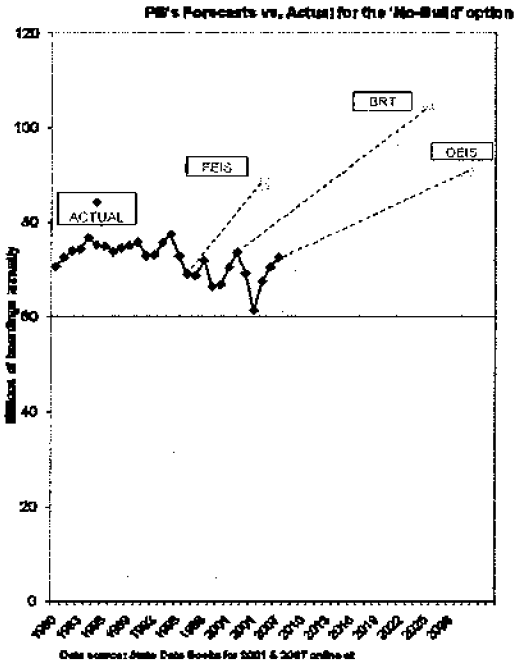
Part V — Unjustifiable forecasts:

1. Ridership forecasts

The No-Build forecast is irrational and it stems from the fact that proponents refuse to recognize that transit continues to lose market share to the automobile and has been doing so for as long as the Census has been collecting commuting data.

We can also measure the decline by using total urban transit boardings and divide it by urban populations — a number that used to be known as the *riding habit*.

Transit boardings per capita of urban population peaked in 1917 at 289 boardings annually. It declined slowly to 276 by 1926 then dropped precipitously during the Depression to 176 by 1940. It increased during World War II and then dropped back down to the earlier level at the end of the war and then declined steadily to 49 in 1970. Since then it has dropped to today's level of 42.



While the decline continues on it is at a much slower rate. And that is because of the subsidies.

In 1960 transit companies were, for the most part, profitable tax-paying privately-operated businesses. In the 1970's began the massive subsidies for transit from local, state and federal governments — some $260 billion just in the last ten years. It has slowed the decline in transit's market share but it has not stopped it.

Honolulu has followed the national trend. Our ridership is slowly declining over time as can be seen from the chart below using the City's ridership data.[1] But while the ridership is declining despite increased population and providing higher service levels to the public, the City and Parsons Brinckerhoff continue to forecast increases for the No-Build alternative, which is what happens if we do little more than we are doing now and have done for the last thirty years.

The chart shows the last three forecasts made by Parsons Brinckerhoff for the No-Build option for the 1992 rail project, the 2003 forecast of No-Build for the BRT program and now the No-Build forecast for this Draft EIS.

The importance of the No-Build forecast is that the rail transit forecast uses the same computer forecasting model. Thus, if the No-Build is optimistic, so are all the forecasts that use the same model, such as the rail transit forecast.

[1] http://hawaii.gov/dbedt/info/economic/databook/Data_Book_time_series/ Table 18.25

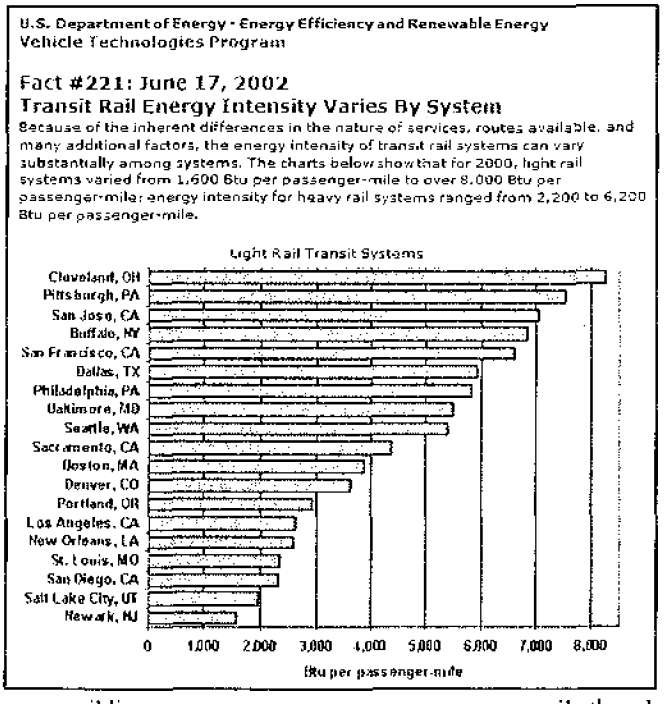
Take a hard look at the above chart. Remember that during this period Oahu has had two periods of incredible fuel cost spikes and declines. We have had periods of great prosperity in the 1980s and late 1990s to 2007 and economic hardship in the early 1990s. We have had population growth and a period of slight population decline. And while we had a general slight decline in bus ridership it was a considerable decline relative to population growth.

The historical data strongly suggests that we will get more of the same unless major changes were to occur.

Since the last two forecasting models have been drastically wrong on Honolulu ridership and since there have been dramatic shortfalls in ridership projections for virtually all new U.S. rail transit systems,[2] the public should be wary of the ridership forecasts for the Project and consider the impacts of lower (and higher) ridership on their future taxes.

The last rapid transit line to open in the U.S. was Puerto Rico's Tren Urbano line which only achieves 40 percent of its FTA approved ridership projections.

2. Projected energy savings have not been carefully examined.



The U.S. Dept. of Energy has measured the energy use of rail by system and finds the following:

"Because of the inherent differences in the nature of services, routes available, and many additional factors, the energy intensity of transit rail systems can vary substantially among systems. The charts [see here and Appendix C] show that for 2000, light rail systems varied from 1,600 Btu per passenger-mile to over 8,000 Btu per passenger-mile; energy intensity for heavy rail systems ranged from 2,200 to 6,200 Btu per passenger-mile."[3]

The average energy use of automobiles is 3,400 Btus per passenger mile according to the U.S. Dept. of Energy.[4] Thus, many rail lines consume more energy per passenger mile than does the average automobile with a typical 1.1 occupants.[5]

Undoubtedly, a full train uses less energy per passenger than a single-occupant vehicle; however, trains are rarely full in both directions except in extremely highly populated metropolitan cities.

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2 See page 5.
3 Fact #221: June 17, 2002 Transit Rail Energy Intensity Varies By System
4 Source: 2007 DOE Energy Data Book. Table 2.13. At: http://cta.ornl.gov/data/tedb27/Edition27_Chapter02.pdf
5 Load factor used was 1.1 occupants for automobiles and 1.72 occupants for light trucks and SUVs. Source: http://cta.ornl.gov/data/tedb27/Edition27_Appendix_A.pdf

Where the confusion arises is that rail proponents unjustly tout the *weighted* average of rail transit energy use. This average is dominated by the energy efficient New York subways, which carry 57 percent of the nation's rail transit traffic and masks the relative energy inefficiency of most other rail lines.

But Honolulu is not going to use the ultra heavy rail equipment, such as New York's, because it does not have the population size to support such equipment.

In addition, autos travel directly from their point of origin to their destination, and therefore, the total miles travelled are much less than by transit – and thus more energy efficient.

With the continued growth of hybrid cars and buses we may expect their energy efficiency to continue to significantly improve up to the horizon year of 2030 while rail transit projections are not forecasting savings.

Construction energy use:

Another form of energy use is that used for its construction. The following is an excerpt from the Congressional Budget Office testimony given by its Director, Alice Rivlin, before the Subcommittee on Transportation, Committee on the Environment and Public Works, United States Senate on October 5, 1977.

> *"In particular, new heavy rail systems appear much less energy-efficient than new bus services, when the energy needed to build roadways and track, the energy needed to manufacture and maintain vehicles, the energy used to heat and light stations, the energy required to drive to stations, and the directness of alternative modes of travel are taken into consideration. The principal reason for this is that the limited route mileage of rail systems necessitates a high degree of auto travel to and from stations, resulting in overall, door-to-door travel patterns that are less energy-efficient than rail travel by itself."*

In short, we believe it will be very difficult for the City to show scientifically and "in an accurate, clear, complete, and unbiased manner"[6] that the proposed rail line is more energy efficient than the average automobile.

The Draft EIS shows:

Daily operating energy for Airport Alternative:	1,224 million btu/day
Construction energyfor Airport Alternative:	7,480,000 million btu

This means construction energy would be 20 years worth of daily energy usage. If we allow a 50 year life for the train and spread the construction energy use over its life then we need to increase the daily usage by 40 percent to get a better picture of energy use.

The construction energy issue together with the shorter distance covered by the automobile makes it almost impossible for even a highly energy-efficient rail line to be more energy efficient than the regular automobile and this should be made clear to the public.

3. The Draft EIS financial plan is unduly optimistic

The City's recently released financial plan shows us that rail is to be funded primarily by the ½ percent General Excise Tax surcharge amounting to $4.1 billion and the federal government with $1.4 billion for a total of $5.5 billion.

The Airport Alternative capital plan shows federal New Starts funding of $1.4 billion and this is much higher than what has been discussed heretofore.

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[6] OMB Guidelines for ensuring the integrity of information. http://www.whitehouse.gov/omb/fedreg/reproducible2.pdf

What is not discussed is that the additional operating subsidy for rail is not accounted for in the cash flow plan but will be paid for with the General and Highway Funds, which is to say, by property taxes. This subsidy grows 34 percent over inflation through 2030 and the total operating subsidy amounts to $5.4 billion during this time.

In addition, even if this highly optimistic financial plan is met, not only would we have $5.4 billion to meet out of property taxes (either increases or foregone reductions) but we will also have over $500 million more in General Obligation bonds than at present.

The City plan shows the GE tax surcharge revenues growing at 5.4 percent compounded annually for 2008-2022 even though that is much faster than the 4.5 percent that it grew during 1992-2005.

The table below consists of the city's forecast taken directly from their Cash Flow Tables associated with the Draft EIS. Calculations of City collections of the ½% GE tax increase					
Fiscal year	Our calculation		City forecast		$ diff.
	Mills. $'s	% change	Mills. $'s	% change	Mills. $'s
2007	$48	Actual	$13	N/A	$35
2008	$169	Actual	$161	N/A	$8
2009	$173	2.5%	$188	16.8%	-$15
2010	$167	-3.5%	$198	5.3%	-$31
2011	$169	1.3%	$207	4.5%	-$38
2012	$174	3.0%	$214	3.4%	-$40
2013	$180	3.1%	$228	6.5%	-$48
2014	$190	5.9%	$242	6.1%	-$52
2015	$203	6.6%	$253	4.5%	-$50
2016	$215	5.7%	$265	4.7%	-$50
2017	$222	3.4%	$274	3.4%	-$52
2018	$231	4.0%	$285	4.0%	-$54
2019	$243	5.3%	$300	5.3%	-$57
2020	$250	3.0%	$309	3.0%	-$59
2021	$260	3.9%	$321	3.9%	-$61
2022	$273	5.0%	$337	5.0%	-$64
2023	$143	5.0%	$261	N/A	-$118
Total	$3,312		$4,056		-$744

Our calculation uses actual collections given by the City's Department of Budget and Fiscal Services for fiscal years 2007 and 2008[7], the projection of percentage increases and decreases in GE tax collections by the State Council on Revenues 2009-2015[8], and the City's projection of annual percentage increases in GE tax revenues for 2016 through 2023 as calculated from their Cash Flow Tables.[9]

The net result is a $744 million shortfall from what the City is projecting. It shows that the City is going currently into deficit and when the economy turns positive the City never catches up.

7 http://hawaii.gov/tax/monthly/2008fyr1.pdf The gross revenues are shown before the State takes its ten percent share.

8 ESTIMATES OF GENERAL FUND TAX REVENUE FY 2009 to FY 2015 at http://www.state.hi.us/tax/cor/2009gf01_with0112_Rpt2Gov.pdf page 4 of 8.

9 http://www.honolulutraffic.com/Cash_Flow_Table.xls

4. Risk assessment understated

The risks that Honolulu taxpayers are taking that are possible, and more likely probable, from inaccurate forecasting are poorly and insufficiently addressed.

The federal government has published two formal studies comparing predicted with actual impacts of New Starts projects. In another omission these are not so much as mentioned or referenced in the Draft EIS.

The financial risk assessment is superficial in that it describes events that could affect the financial performance of the Project, but does not address the consequences. For example, the Draft EIS discusses factors that could affect Project capital costs and funding, and Project operating costs and revenues, but it does not elaborate (or even mention) the consequences of any shortfall in capital of operating cash flow.

A significant capital shortfall could result in stoppage of the Project at an intermediate stage, and/or delay in completion of any or all of the extensions or be made up by incurring further debt.

A significant shortfall in cash flow could result in deferral of other City projects or programs, or would have to be made up by City subsidies, which are primarily funding by property taxes.

At a minimum, the risk assessment should include such items as:

- How any additional borrowing will be paid for.
- A sensitivity analysis of Project negative cash flows (capital or operations) on property taxes.
- A detailed analysis of projects that would have to be delayed (including this one) based on insufficient capital.
- Identification of environmental projects that would be affected (sewage plant upgrades, collection system upgrades, sewer maintenance).
- Identification of quality-of-life issues (road maintenance and repairs, park maintenance and other city services).

The EIS needs to explain "in plain language" the financial risks taxpayers will be taking with the City's rail transit proposal.

This is particularly important for Honolulu since, on a per capita basis, the $4.5 billion in 2008 dollars (or $5.4 billion in year of expenditure dollars) projected cost would make it by far the most expensive rail lines on a per capita basis ever built in the U.S, even allowing for inflation and without cost overruns.

Rail transit costs per capita of population[10]

MSA	Cost in millions 2006$'s	Metro area population (thous.)	Cost per capita
Dallas	$1,067	5,222	$204
Denver	$358	2,582	$139
Portland	$1,643	2,265	$725
Sacramento	$307	1,797	$171
Salt Lake City	$376	1,334	$282
St. Louis	$464	2,604	$178
Pittsburgh	$1,051	2,571	$409
Honolulu	$4,200	920	$4,565

To make a sensible assessment of the financial risks of the project, policy makers need to review the experiences of other metro areas that have built rail lines with actual versus projected capital and operating costs and ridership. The use of comparable projects is widespread in business planning and certainly in real estate. It should be an FTA requirement that transit agencies include comparable data in their EISs.

[10] The data in the table is not completely reliable but does approximate the relative per capita costs.

Until recently the only official U.S. Department of Transportation (USDOT) comparisons of other metro areas capital cost projections and ridership versus actual outcomes, was the 1990 *Pickrell Report*[11] which focused "upon the accuracy of projections that were available to local decision-makers at the time the choice among alternative transit improvement projects was actually made" (original emphasis). This is usually the time when the Locally Preferred Alternative is selected.

This report showed cost overruns for the eight rail projects studied as averaging 42.8 percent. Importantly, they revealed a wide error range from the best, the original Pittsburgh light rail line, at 11 percent under projection, to the worst, at 83 percent over.

The second study, FTA's *Predicted and Actual Impacts of New Starts Projects*[12] was released last year and also compares projected costs at the Alternatives Analysis/Draft EIS and FEIS stages with actual costs. The average cost overrun in this study was 40.2 percent.

Many agencies use cost forecasts that were made much later in the process, some just before the opening of the line, long after the primary decisions had been made. These tend to show much higher projected costs and therefore show a greater likelihood of coming in "under budget."

Furthermore, in reviewing the two studies we find little consistency in the percentage overruns. While the averages are around 40 percent over, they vary from 28 percent under projection to 186 percent over so we can take little comfort from the averages.

The following table shows the range of errors and also the average error for both cost and ridership projections in each of the two reports.

More important than averages is the distribution of the various error rates. For example, if the resulting costs of the 21 projects were between ± 10 percent of the original projections it would be a reasonable indication to the public of the accuracy of the projections.

Projections versus Actual — Ridership and Costs				
	costs vs. projections		Ridership vs. Projection	
	Cost range	Average	Range	Average
Pickrell Report	-11% to +83%	+43%	-28% to -85%	-62%
FTA CPAR Report	0% to +186%	+40%	-84% to +39%	-39%

But when faced with actual results that range from on budget to nearly triple the projection, what is the public to make of it? Based on the wide range of uncertainty, what is the public to believe?

Even if we were to use just the average it would increase the Honolulu Project cost from $4.5 billion to $6.3 billion — a nearly $2 billion increase. And ridership would be 39 percent lower than projected,[13] which would mean fare revenues of $800 million less than the City is planning on through 2030.

The City Administration will undoubtedly paint this as ridiculously improbable and wildly pessimistic.

However, each of these recent 21 capital cost projections was thought at the time to be reasonable by both the transit agency and its consultant who produced them. Just as our City Transportation Department and its consultants, Parsons Brinckerhoff and InfraConsult, also believe their current cost projections are reasonable.

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[11] Pickrell, Don H. Urban Rail Transit Projects: Forecast Versus Actual Ridership and Costs. U.S. Dept. of Transportation. October 1990. Informally known as the Pickrell Report.

[12] Federal Transit Administration. *The Predicted and Actual Impacts of New Starts Projects -- 2007: Capital Cost and Ridership.* April 2008. We used the Alternatives Analysis/Draft EIS forecasts for comparison as did the Pickrell Report.

[13] http://www.fta.dot.gov/documents/NSPA2007_Final(1).pdf Table 7.

In addition, the FTA's in-house analysts and outside consultants also examined each of these 21 capital cost projections in great detail and thought them all reasonable.

And so here we have innumerable transit planners, engineers and accountants, all well educated and experienced and all believing that, as a the result of their hard work, the cost projections are, dare we say it, reasonable. Yet each new project seems to ignore past experience, and in most cases, the project comes in significantly over budget.

The FTA believes that projects that are within ± 20 percent range are reliable.[14] On this basis, Honolulu's forecast could have nearly a billion dollar cost overrun and still be considered "reliable." But, in this latest FTA report, more than half of the projects exceeded the 20 percent deviation limit.

The public needs to understand the financial risk and implications of various levels of cost overruns, and then consider how, or even if, they, as taxpayers, can cope with the resulting financial impact. After all, Hawaii's senior Senator, Daniel Inouye, said that if the City had to spend one billion dollars fixing the sewage treatment facility, it would bankrupt us. The rail project could cost as much as $9 billion, before accounting for operating losses and bond interest. What would be the financial impact of that?

The Draft EIS shows us clearly that traffic congestion, with rail, is going to be far worse than it is today.[15] Is it reasonable to expect that Honolulu taxpayers to afford to risk this many billions of dollars on a project that will not reduce traffic congestion below today's unbearable levels?

The issue here is that the public needs to be provided in the EIS with sufficient quantified information about the financial risks and uncertainties in the project for them to understand what could be the impact on their future property taxes.

The Draft EIS states that transit operating subsidies will increase from the current less than 10 percent of the City Budget to 14 percent by 2030.[16] Since the subsidies will continue to be funded from the City's Highway and General Funds,[17] what will be the effect on property taxes given a range of errors for both capital costs and ridership?

5. Operating subsidies are understated:

The City projects operating subsidies to be 70 percent of operating costs, which has been a long-term City Council policy. Thus the higher the operating costs, the higher the subsidies.

Operating costs for the mid-priced Airport Alternative are projected to be $68 million[18] annually to carry unlinked trips (boardings) of 29.9 million[19], or $2.27 per unlinked trip.

However, nowhere in the Draft EIS is there any indication of what is being used as the basis for calculating operating costs.

Since we are planning to build an elevated steel-on-steel rapid transit system we should compare our projected operating costs with those of other U.S. cities with elevated rapid transit lines.

There are just two elevated lines that seem appropriate, the Miami Metrorail and San Juan's Tren Urbano. Their actual operating costs per trip in 2007 were $4.61[20] and $6.83[21] respectively. This would lead us to believe that Honolulu's projected $2.27 may be understated.

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14 CPAR p. 9.
15 Kalauao Screenline AM Peak Koko Head bound traffic volumes are forecast in the Draft EIS to increase by nearly 10 percent from today's levels with no additional highway capacity planned.
16 Draft EIS, pp. 6-7 & 8
17 Draft EIS, Section 6.4.4.
18 Draft EIS, Table 6-3.
19 Draft EIS, Table 3-16 shows 95,000 average weekday boardings, which multiplied by 315 results in 29.9 million.
20 http://204.68.195.57/ntdprogram/pubs/profiles/2007/agency_profiles/3034.pdf

If we examine actual versus projected operating costs and ridership of other rail lines we can get a handle on the risks being taken in this cost category.

The FTA's latest assessment of ridership published last year showed average shortfalls from the projected ridership were 39 percent while the earlier *Pickrell Report* showed an average shortfall of 61 percent.

Another FTA Report released last year dealt with cost overruns for operating costs.[22] This showed an average cost overrun was 87 percent. This was remarkably close to the only other assessment of operating cost overruns, which was the *Pickrell Report* averaging 83 percent.

If we apply the 87 percent overrun to Honolulu's projected $68 million operating costs it results in $127 million. And if we reduce ridership by 39 percent to 58 million and then divide that into the $127 million it results in operating costs of $6.81 per unlinked trip, or three times the amount currently projected.

Since the aggregate operating costs for bus and rail combined through 2030 is currently projected at over $7 billion[23] the public should be made aware of the significant risk being taken in this area.

There is also a danger that we may have made insufficient allowance in the calculation for transit police, which is usually a major expense and transit agencies often omit it from their forecasts by accounting for it in other parts of their budgets.

Los Angeles pays in excess of $50 million annually for their Transit Police with about three times the rail ridership projected for Honolulu. We note that is no mention of such costs in the Draft EIS.

6. Replacement and Refurbishing

The city does not explicitly warn the public in the Draft EIS that virtually all of the rail cars, rail lines and other equipment will have to replaced, or rehabilitated, also known as R&R, within 35 years from the start of operations.

Other than to project that the City will expend $62 million[24] on R & R through 2030, the following two paragraphs is all that is said.

> *The estimates include ongoing costs for replacing, rehabilitating, and maintaining capital assets in a state of good repair throughout the forecast period (2007 to 2030). Rail rehabilitation and replacement costs are expected to begin 16 years after initial construction activities are completed. Draft EIS, 6-3.*
>
> *6.4.3 Ongoing Capital Expenditure Cash Flow: Systemwide ongoing capital expenditures include all necessary replacement, rehabilitation, and improvements to the existing system (TheBus and TheHandi-Van) as well as the Project. Funding sources used to pay for these capital expenses consist of discretionary and formula-based Federal funding programs (see Section 6.2.3, Funding Sources for Ongoing Capital Expenditures, for descriptions of these programs). Any resulting funding gap is assumed to be bridged on an annual basis with City General Obligation Bonds, as is currently the case with transit-related budgets. Therefore, the resulting ongoing capital sources and uses would balance in any given year. Draft EIS, 6-10.*

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[21] http://204.68.195.57/ntdprogram/pubs/profiles/2007/agency_profiles/4094.pdf
[22] http://www.fta.dot.gov/documents/CPAR_Final_Report_-_2007.pdf
[23] Draft EIS Cash Flow Tables, Airport Alternative, total YOE$.
[24] Draft EIS Cash Flow Tables. In 2008 dollars, or $116 million in YOE$.

Failing to provide for R&R results in this Washington DC headline that "Metro needs $11.3 billion" which goes on to explain that,

> *$7 billion alone is needed just to maintain service and keep the system running safely and reliably from 2010 to 2020. That includes repairs to leaking tunnels and crumbling platforms, as well as replacements for aging rail cars.*[25]

The following are some of the provisions made for R&R by other rail transit lines such as San Francisco's BART, the Chicago Transit Authority's rail transit, and Atlanta's MARTA, as follows:

Chicago Transit Authority capital expenditure plan spells out that:

> *"All rail cars rehabilitated at mid-life (12-13 years), overhauled at their quarter-life points (6 and 18 years), and either rehabilitated or replaced at the end of their useful life (25 years)."*[26]

Similarly, the Atlanta Transit Authority concurs:

> *"MARTA started work last year to rebuild and upgrade all 48 miles of track. It is an extensive project that will not be complete until mid-2007. Our trains have run every day for over 25 years – this work is necessary to keep the system strong for the next 25 years and beyond. The Track Renovation is part of a major capital program that also includes the overhaul of over 200 of MARTA's rail cars."*[27]

Los Angeles plans for R&R using the Peskin model:

> *"Projected rehabilitation and replacement costs are based on a methodology developed by Robert Peskin of KMPG Peat Marwick (commonly called Peskin Model). This methodology was developed based on actual costs experienced by the Washington Metropolitan Area Transit Authority (WMATA). Actual WMATA rehabilitation and replacement costs were compared to their original installation capital costs. The MTA rail rehabilitation and replacement costs were calculated in the same manner based on the Metro Blue, Red, Gold and Green Lines original installation capital costs. The rehabilitation and replacement costs are estimated to begin five years after a rail line begins revenue operations. Some limited repair is assumed in the forecasting model for the first few years as reflected in the five-year MTA Capital Improvement Program (CIP) and annual budget."*

Based on the MTA Office of Management and Budget near term forecast and Peskin Model in the later years the rail rehabilitation and replacement costs through 2025 are $4.7 billion.[28]

BART began its first major repair and rehabilitation plan in 1994 at a cost of $1.2 billion within only 20 years of opening. At the time, their balance sheet showed "Facilities, property and equipment" was $2.4 billion, net of $0.7 billion in depreciation.[29] Thus, the total invested in this category through 1994 had been $3.1 billion.

The Bay Area's Transportation and Land Use Coalition[30] tells us that the BART Planning Department reported to the Board of Directors meeting on November 9, 2000, that total repair and refurbishing requirements for BART during 2001 to 2030 would be $6.8 billion spread across the entire 30-year period.

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[25] http://www.washingtontimes.com/news/2008/sep/23/metro-needs-113-billion/
[26] http://www.transitchicago.com/business/capitalprogram.html
[27] http://www.itsmarta.com/newsroom/latest_news/singletrack.htm
[28] Short Range Transportation Plan for Los Angeles County, Technical Document 2003
[29] Bay Area Rapid Transit, 1972 through 1994 Annual Reports.
[30] http://www.transcoalition.org/reports/overext/overextended.html

The San Francisco Bay Area voters were unaware at the time of the BART decision that BART would need to refurbish or replace "facilities, property and equipment" in amounts far exceeding BART's original cost; they had been sold on the concept that once you have built rail it is there forever.[31]

Honolulu's rail line financial plan should make provision for potential refurbishing liabilities using the Peskin model (or similar) to provide decision-makers with the appropriate financial information detailing likely future financial obligations for replacement, refurbishing and system enhancement. The Peskin Model[32] is used by the Washington Metro and Los Angeles among other. A useful discussion of the subject is in the 2004 Status of the Nation's Highways, Bridges, and Transit, Chapter 7c.

The Federal Transit Administration (FTA) requires that,

> *"Agencies planning major capital investments need to incorporate the [repair and refurbishing] (R&R) of those assets in the later years of the capital plan in addition to the ongoing R&R of the existing asset base."*[33]

It would be helpful to think in terms of the Aloha Stadium which has cost far more to maintain than it ever cost to build. As the Honolulu Advertiser explained last year,

> *The estimated $185 million renovation of Aloha Stadium is expected to transform the rusting, 33-year-old facility into a "new stadium," ... Since opening in 1975 at a cost of $32 million, the state's largest facility has been dogged by costly repairs and lawsuits. From 1985 to 1995, rust treatment cost $80 million..*[34]

The City needs to establish a detailed schedule of R&R obligations that the rail line is likely to face in future years so that the public is fully aware of what they are getting themselves into.

The impacts of forecasting errors

A major concern is that the City's Cost-Effectiveness Rating of "Medium" hovers near the "Medium-Low" rating, which would make the project ineligible for federal New Starts funds.

The FTA rating is calculated by dividing projected new riders into the total of projected annualized capital costs and projected annual operating costs. At present the FTA rates a new trip as cost-effective if it costs $22 or less. That amounts to a subsidy of over $10,000 per new rider annually.

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31 Excerpt from a speech by Todd Litman at the Mayor's Transit Symposium.

32 Peskin, Robert L. 1988. "Methodology for Projecting Rail Transit Rehabilitation and Replacement Capital Financing Needs." In: Transportation Research Record 1165. Washington, DC: Transportation Research Board, National Research Council.

33 Source: http://www.fta.dot.gov/printer_friendly/planning_environment_2423.html
8.3.1.1 Rehabilitation and Replacement. The rehabilitation and replacement (R&R) of capital resources is needed for several reasons. First, capital resources wear out. Stations, maintenance facilities, track-way, signal systems, propulsion systems, and vehicles all have distinct useful lives. These assets must be re-capitalized before deterioration leads to service disruptions. Second, technological obsolescence due to the availability of parts or technological advances may spur the replacement of various systems. Old rail cars may become increasingly difficult to maintain and require replacement or agencies may wish to implement communications based train control, automatic train stop, or passenger information systems to improve system reliability and safety. Third, changes in operating or safety policies may require new capital investment. One example is station or vehicle enhancements to assure compliance with the American's with Disabilities Act (ADA).
Prudent capital planning requires an inventory of the agency's assets and an evaluation of the expected useful life of each major component. An R&R cycle is assumed for each of the major assets and annual costs are projected at least 20 years into the future. Agencies planning major capital investments need to incorporate the R&R of those assets in the later years of the capital plan in addition to the ongoing R&R of the existing asset base.
In most cases, the capital costs for R&R will vary markedly from one year to the next due to different cycles and widely varying costs for the numerous components. Agencies typically establish reserve accounts, sometimes called sinking funds, to provide the funds for sudden increases in capital spending. Occasionally, agencies smooth out the R&R cost swings by using a multi-year rolling average as the annual cost estimate.

34 http://the.honoluluadvertiser.com/article/2008/Jun/27/ln/hawaii806270385.html

However, if the projections are not achieved and recent FTA assessments of cost overruns for capital costs, cost overruns for operating costs and shortfalls in ridership occur then the cost effectiveness calculation changes dramatically.

We are also concerned that the fact that at this late stage the Project does not yet have an FTA rating yet there is no explanation of why that should be, as is required by NEPA:

> *... (Draft EISs) must present -- for all alternatives — the information used by FTA to assign New or Small Starts ratings if that information has been vetted by FTA. If the information has not been vetted with FTA, then the absence of the information must be highlighted in the document.*
>
> *The intent of this policy is to comply with FTA requirements for AAs and the Council on Environmental Quality for DEISs by identifying information relevant and important to a decision on a locally preferred alternative. If this requirement cannot be met, publication of the AA or AA/DEIS would not be delayed; rather, the absence of the information and its relevance must be explained in the AA or AA/DEIS. (emphasis added)*[35]

Instead, in the Draft EIS, the City slides by the issue rather than highlighting and explaining why the Project is not rated. This is the City's explanation:

> *The cost-effectiveness indices for the Build Alternatives compared to the baseline fall within the "medium" range established by FTA for its New Starts ratings, which, along with other considerations, is currently required to qualify for New Starts funding. FTA is currently reviewing the estimates made for ridership and user benefits, operating and maintenance costs, and capital costs for the Build Alternatives. If these results hold up through subsequent phases of project development, along with other FTA considerations, the Project would be in the competitive range for funding consideration. Funding recommendations are made each year from among the projects that have completed the planning and project development process, including the National Environmental Policy Act process. These recommendations reflect the merits of the projects competing for available Federal funds at the time, as well as the availability of New Starts funding authorization. DEIS, p. 7-9.*

The fact that the Project is not yet rated is not made clear. It is certainly not highlighted since the subject is not even mentioned in the Executive Summary. This is important as without a rating the Project cannot enter Preliminary Engineering.

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[35] http://edocket.access.gpo.gov/2007/pdf/07-2774.pdf p. 30913.

Appendix C

Energy Use per passenger mile of rail systems		
Light Rail Transit		
City, State	Btu per passenger-mile	Average
Cleveland, OH	8,250	
Pittsburgh, PA	7,526	
San Jose, CA	7,035	
Buffalo, NY	6,839	
San Francisco, CA	6,591	
Dallas, TX	5,935	
Philadelphia, PA	5,828	
Baltimore, MD	5,508	
Seattle, WA	5,383	
Sacramento, CA	4,368	
Boston, MA	3,878	
Denver, CO	3,612	
Portland, OR	2,927	
Los Angeles, CA	2,621	
New Orleans, LA	2,594	
St. Louis, MO	2,366	
San Diego, CA	2,337	
Salt Lake City, UT	1,970	
Newark, NJ	1,597	
Sub Total light rail	87,165	4,588
Heavy Rail Transit		
City, State	Btu per passenger-mile	
Cleveland, OH	6,173	
Lindenwold, NJ	5,027	
Miami, FL	4,928	
Boston, MA	4,464	
Chicago, IL	4,205	
Philadelphia, PA	4,001	
Baltimore, MD	3,845	
Washington, DC	3,761	
New York, NY	3,388	
Oakland, CA	2,745	
Brooklyn, NY	2,482	
Atlanta, GA	2,249	
Sub Total heavy rail	47,268	3,939
Grand Total all rail systems	134,433	4,337
U.S. Dept. of Energy, Transit System Energy Use.		
Average auto		3445
Average transit bus		4323
Source. U.S. Dept. of Energy Data Book, tables 2.12 & 2.13		

February 6, 2009

Part VI — "Strategic misrepresentation" in the Draft EIS

The University of Aalborg, Denmark, conducted the most extensive international study ever of actual versus estimated costs in transportation infrastructure development.[1] A summary of the study was published in the American Planning Association Journal. The study concluded:

> *"Based on a sample of 258 transportation infrastructure projects worth US$90 billion and representing different project types, geographical regions, and historical periods, it is found with overwhelming statistical significance that the cost estimates used to decide whether such projects should be built are highly and systematically misleading. Underestimation cannot be explained by error and is best explained by strategic misrepresentation, that is, lying. The policy implications are clear: legislators, administrators, investors, media representatives, and members of the public who value honest numbers should not trust cost estimates and cost-benefit analyses produced by project promoters and their analysts."*

Other distinguished and authoritative transportation experts have warned about cost misrepresentations in rail projects. Dr. John Kain, Chair Emeritus of Harvard's Economics Department, wrote *Deception in Dallas*, Dr. Don Pickrell, Chief Economist of the U.S Department of Transportation's Volpe Center, wrote what is known as the *Pickrell Report*, Dr. Martin Wachs, Head of Rand Corporation's Transportation practice and Chair Emeritus, Department of Urban Planning, UC-Berkeley, wrote *When planners lie with numbers,*" and there have been many, many others.

The Draft EIS needs to make clear the amount of scholarly literature produced by academic transportation experts[2] detailing the misrepresentations by promoters of rail transit and the virtual

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[1] Flyvbjerg et al. *"Underestimating Costs in Public Works Projects: Error or Lie?"* American Planning Association Journal. Summer 2002.

[2] Hall, P. (1980). Great planning disasters. Harmondsworth, UK: Penguin Books. Penguin Books.
Hall, P. (n.d). Great planning disasters revisited. Unpublished manuscript, Bartlett School, University College, London. UK: Cambridge University Press.
Holm, M. K. S. (1999). Inaccuracy of traffic forecasts and cost estimates in Swedish road and rail projects. Unpublished manuscript, Aalborg University, Department of Development and Planning.
Hufschmidt, M. M., & Gerin, J. (1970). Systematic errors in cost estimates for public investment projects. In J. Margolis (Ed.), The analysis of public output (pp. 267–315). New York: Columbia University Press.
Kain, J. F. (1990). Deception in Dallas: Strategic misrepresentation in rail transit promotion and evaluation. Journal of the American Planning Association, 56(2), 184–196.
Leavitt, D., Ennis, S., & McGovern, P. (1993). The cost escalation of rail projects: Using previous experience to re-evaluate the calspeed estimates (Working Paper No. 567). Berkeley: Institute of Urban and Regional Development, University of California.
Mackie, P., & Preston, J. (1998). Twenty-one sources of error and bias in transport project appraisal. Transport Policy, 5(1), 1–7.
Merewitz, L. (1973a) How do urban rapid transit projects compare in cost estimate experience? (Reprint No. 104). Berkeley: Institute of Urban and Regional Development, University of California.
Merewitz, L. (1973b). Cost overruns in public works. In W. Niskanen, A. C. Hansen, R. H. Havemann, R. Turvey, & R.Zeckhauser (Eds.), Benefit cost and policy analysis (pp. 277–295). Chicago: Aldine.
Nijkamp, P., & Ubbels, B. (1999). How reliable are estimates of infrastructure costs? A comparative analysis. International Journal of Transport Economics, 26(1), 23–53.
Pickrell, D. H. (1990). Urban rail transit projects: Forecast versus actual ridership and cost. Washington, DC: U.S. Department of Transportation.
Pickrell, D. H. (1992). A desire named streetcar: Fantasy and fact in rail transit planning. Journal of the American Planning Association, 58(2), 158–176.
Simon, J. (1991). Let's make forecast and actual comparisons fair. TR News, 156, 6–9.
Skamris, M. K., & Flyvbjerg, B. (1997). Inaccuracy of traffic forecasts and cost estimates on large transport projects. Transport Policy, 4(3), 141–146.
Szyliowicz, J. S., & Goetz, A. R. (1995). Getting realistic about megaproject planning: The case of the new Denver International Airport. Policy Sciences, 28(4), 347–367.
Wachs, M. (1986). Technique vs. advocacy in forecasting: A study of rail rapid transit. Urban Resources, 4(1), 23–30.
Wachs, M. (1989). When planners lie with numbers. Journal of the American Planning Association, 55(4), 476–479.

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complete lack of such literature defending them. The public needs to be so sufficiently informed about it that no one will be able to complain in the future that they were not warned.

> *NEPA procedures must insure that environmental information is available to public officials and citizens before decisions are made and before actions are taken. The information must be of high quality. Accurate scientific analysis, expert agency comments, and public scrutiny are essential to implementing NEPA.*[3]

There are many misleading elements of the Draft EIS. There are both errors of commission and omission and are dealt with below under the following headings:

1. Omissions of relevant material.
   a) OMPO surveys
   b) Future traffic conditions vs. today omitted.
   c) The Draft EIS omits relevant information about highways.
   d) Change of observed volumes without discussion
   e) Does not discuss the differences between Draft EIS and Alternatives Analysis
2. Misleading purpose and need statement.
3. Renderings that do not match reality

1. Omissions of relevant material

a) OMPO surveys:

In its entirety, this is how the Draft EIS describes the 2004 Oahu MPO Survey[4]:

> *As part of its work to update the Regional Transportation Plan, the O'ahu Metropolitan Planning Organization (O'ahuMPO) surveyed O'ahu residents about transportation issues in 2004. The survey results identified traffic congestion during the commute period in the study corridor extending from 'Ewa and Central O'ahu to Downtown Honolulu as the biggest concern. Nearly twice as many residents responded that improving transit was more important than building more roadways. Seventy percent of the respondents believed that rail rapid transit should be constructed as a long-term transportation solution, and 55 percent supported raising taxes to provide local funding for the system. (Draft EIS p. 1-3).*

From this one would not gather that the same Oahu MPO Survey Summary said in its entirety:

> *"Based on the survey, most residents appear to accept the necessity of tax increases to fund specific capital projects, such as new road-building, road widening and extensions. Between a Rapid Rail system and the BRT, residents do not indicate a strong preference for one over the other. There is broad support for either system, generally, with strongest support for the Rapid Rail system coming from the Ewa/Kapolei and Leeward areas of Oahu."*

Or that in a later page it would summarize question responses as follows:

- *60% would reportedly support a tax hike for road widening or extensions.*
- *59% would support a tax hike for new road-building.*
- *57% would back a tax hike for a rail rapid transit system.*

Wachs, M. (1990). Ethics and advocacy in forecasting for public policy. Business and Professional Ethics Journal, 9(1-2), 141-157.
Walmsley, D. A., & Pickett, M. W. (1992). The cost and patronage of rapid transit systems compared with forecasts (Research Report 352). Crowthorne, UK: Transport Research Laboratory.

2 Edwards, Chris. Government Just Can't Contain Itself. Cato Institute. September 23, 2003

3 http://edocket.access.gpo.gov/cfr2002/julqtr/40cfr1500.1.htm

4 www.honolulutraffic.com/issuessurvey.pdf

- *54% would back tax increases to improve the bus system.*

Adding to these errors of omission is that the City avoided altogether discussing a subsequent 2006 OMPO Survey[5]. Here is one excerpt from this Survey's Summary:

> *Oahu traffic and, in particular, congestion in Ewa/Kapolei, remains a key concern of residents. The key priorities are: (1) road-widening of the H-1 in the Honolulu corridor; and (2) widening Farrington Highway in Kapolei and Waianae.*
>
> *Relative to Rail Rapid Transit, over one-third of Oahu residents indicated that they would use the system on a regular basis.*
>
> *There is also majority support for the concepts of HOT lanes from Ewa to downtown and for a Pearl Harbor bridge or tunnel, but not for funding construction via higher taxes.*

b) Future traffic conditions versus today's traffic omitted

From the beginning the City and Parsons Brinckerhoff have misled the public into believing that rail transit will relieve congestion.

Far from *"supporting proactive public involvement"*[6] our elected officials and their appointees and consultants have continually alluded to the idea that rail transit will result in traffic congestion relief even though the Alternatives Analysis and the Draft EIS both show that traffic congestion will get significantly worse with the rail transit alternative than it is today.

A significant omission in the Draft EIS is that nowhere does it discuss future highway conditions with rail. In fact, it deliberately goes out of its way to avoid doing so. For example, the discussion of traffic conditions in section 3 assesses future traffic conditions for No-Build but not with the Build alternative. Nor does the Summary of Findings on page 3-53, which is shown below.

> *Existing Conditions: Increasing traffic congestion and constrained transit operating conditions have reduced system reliability and mobility for all travelers.*
>
> *Effects of the No Build Alternative: Traffic congestion would worsen, even with $3 billion in other planned roadway improvements, affecting mobility and reliability for all travelers.*
>
> *Effects of the Build Alternatives: [No mention of traffic congestion].*

The omission of future traffic congestion with the Build Alternative compared to the congestion that exists today in both the body and the summary shows that it was deliberate.

In addition, the Draft EIS has avoided any discussion of the new 2006 *National Strategy to Reduce Congestion on America's Transportation Network*[7]. Its preamble reads,

> *Congestion is one of the single largest threats to our economic prosperity and way of life. Whether it takes the form of trucks stalled in traffic, cargo stuck at overwhelmed seaports, or airplanes circling over crowded airports, congestion is costing America an estimated $200 billion a year.*
>
> *Each year, Americans lose 3.7 billion hours and 2.3 billion gallons of fuel sitting in traffic jams and waste $9.4 billion as a result of airline delays. Worse, congestion is affecting the quality of Americans lives by robbing them of time that could be spent with families and friends.*

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5 http://www.honolulutraffic.com/Trans_Proj_Surv_Results_2006.pdf

6 It is the policy of the … Federal Transit Administration (FTA) to aggressively support proactive public involvement at all stages of planning and project development. *http://www.fhwa.dot.gov/environment/pl_pol.htm*

7 http://isddc.dot.gov/OLPFiles/OST/012988.pdf

> *Congestion is not a fact of life. It is not a scientific mystery, nor is it an uncontrollable force. Congestion results from poor policy choices and a failure to separate solutions that are effective from those that are not.*

Given the current traffic conditions in Honolulu, and also the following NEPA requirement, one would think the new policy worthy of mention, if not analysis:

> *An agency shall identify and discuss all such factors including any essential considerations of national policy which were balanced by the agency in making its decision and state how those considerations entered into its decision. 40CFR1505.2(b)*

c) Highway capacity data omitted

In the Alternatives Analysis, Table 3-12, highway capacity data was given for each of the corridor's highway components. This has been omitted and makes it difficult to understand what caused the dramatic reductions in the Draft EIS from the Alternatives Analysis in forecast traffic volumes at the various screenlines.

For example, the Kalauao screenline in the Alternatives Analysis shows that the observed traffic volume for 2003 during the peak hour slightly in excess of the highway capacity shown, which motorists in the corridor would find accords with experience. However, the Draft EIS observed volume for 2005 shows an eight percent reduction in traffic from 18,870 to 17,300, and less than the highway capacity shown in the Alternatives Analysis, which certainly does not accord with experience.

Kalauao Screenline AM Peak Head bound volumes AA= Alternatives Analysis			Koko
AA Highway Capacity	AA 2003 Actual	AA 2030 No-Build	AA 2030 Build
18,450	18,870	28,023	26,101
Draft EIS Highway Capacity	Draft EIS 2005 Actual	Draft EIS 2030 No-Build	Draft EIS 2030 Build
N/A	17,300	20,800	18,910

Source: Alternatives Analysis, Table 3-12, Draft EIS, Tables 3-12 & 3-20

Further, there is a 28 percent reduction in projected traffic volume for the Draft EIS 2030 Build Alternative compared with that of the Alternatives Analysis from 26,101 down to 18,910. No explanation is given for this.

We know that with no planned widening of H-1 the freeway cannot accommodate either the 18,910 given in the Draft EIS, let alone the 26,101 vehicles per hour projected by the Alternatives Analysis. Are we to assume that the City and Parsons Brinckerhoff recognize that the highways will be excessively congested and that the excess traffic will be accommodated in extended shoulder periods?

In other words, those who currently leave home at 5:00 AM to miss the worst of the traffic will, in the future, with rail have to leave home at 4:00 AM — or earlier?

If this is the case, why does the City not say so? Or is it once again to avoid any discussion of traffic congestion relative to today's unbearable levels?

2. Misleading purpose and need statement:

> *Congestion is not a scientific mystery, nor is it an uncontrollable force. Congestion results from poor policy choices and a failure to separate solutions that are effective from those that are not.*[8]

[8] http://isddc.dot.gov/OLPFiles/OST/012988.pdf

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The relevant federal requirements regarding the "purpose and need statement" are as follows:

> *... the lead agency shall provide an opportunity for involvement by ... the public in defining the purpose and need for a project ... The statement of purpose and need shall include a clear statement of the objectives that the proposed action is intended to achieve ... (SAFETEA-LU Sec. 6002).*
>
> *"FHWA and FTA review would include making sure that objectives or choices derived from the transportation plan were: based on transportation planning factors established by Federal law; reflect a credible and articulated planning rationale; founded on reliable data; and developed through transportation planning processes meeting FHWA and FTA statutory and regulatory requirements. In addition, the basis for the goals and choices must be documented and included in the NEPA document."*[9] (emphasis added)
>
> *Consistent with NEPA, the purpose and need statement should be a statement of a transportation problem, not a specific solution ... A purpose and need statement that yields only one alternative may indicate a purpose and need that is too narrowly defined.*[10]

The NEPA regulations require that,

> *Environmental impact statements "shall be written in plain language ... so that ... the public can understand them."*[11]

The purpose statement in the Draft EIS is presented here in its entirety while the need statement that follows is truncated in the interests of space:

> *1.7 Purpose of the Project*
>
> *The purpose of the Honolulu High-Capacity Transit Corridor Project is to provide high-capacity rapid transit in the highly congested east-west transportation corridor between Kapolei and UH Manoa, as specified in the O'ahu Regional Transportation Plan 2030 (ORTP) (O'ahu MPO 2007). The project is intended to provide faster, more reliable public transportation service in the study corridor than can be achieved with buses operating in congested mixed-flow traffic, to provide reliable mobility in areas of the study corridor where people of limited income and an aging population live and to serve rapidly developing areas of the study corridor. The project also would provide additional transit capacity, an alternative to private automobile travel, and improve transit links within the study corridor.*
>
> *Implementation of the project, in conjunction with other improvements included in the ORTP, would moderate anticipated traffic congestion in the study corridor. (Draft EIS p. 1-19.)*

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9 http://www.fhwa.dot.gov/hep/plannepa050222.pdf

10 http://edocket.access.gpo.gov/2007/pdf/07-493.pdf Federal Register / Vol. 72, No. 30 / p. 7282.

11 40 C.F.R. § 1502.8

1.8 Need for Transit Improvements

There are several needs for transit improvements in the study corridor. These needs are the basis for the following goals:

Improve corridor mobility

Improve corridor travel reliability

Improve access to planned development to support City policy to develop a second urban center

Improve transportation equity (Draft EIS, p. 1-20/21)

The main misrepresentation in this purpose and needs statement is that it is in total conflict with what the public understands. The Draft EIS says that the "purpose and need" is a need for "transit improvements" and the purpose is to build "rapid transit."

Aside from the misrepresentation the statement is at variance with FTA/FHWA guidance,

Consistent with NEPA, the purpose and need statement should be a statement of a transportation problem, not a specific solution.[12]

The public believes that the purpose of the project is to reduce traffic congestion. This is reinforced in the Draft EIS by the following:

Total congestion would be reduced by 21 to 23 percent with the Build Alternatives."S-5

"Implementation of the project, in conjunction with other improvements included in the ORTP, would moderate anticipated traffic congestion in the study corridor." (p.1-19)

The general understanding of the public is that the purpose of the Project is to reduce traffic congestion in the Corridor so it less than today's unbearable levels and also, *incidentally*, provide improved public transportation.

"The statement of purpose and need shall include a clear statement of the objectives that the proposed action is intended to achieve ... " SAFETEA-LU Sec. 6002.

When does one hear the ordinary citizen use phrases like "Improve corridor mobility," "Improve corridor travel reliability," and "moderate anticipated traffic congestion"?

This is jargon for those working in the transportation industry; it is not understood by the average resident unless they habitually parse sentences in City documents. To the average citizen, to moderate or reduce traffic congestion means relative to what they experience today — and not some projected condition in the future unless explicitly told so.

A "clear statement" would say instead that, "It is not the Purpose of the Project to reduce traffic congestion below today's levels, it is to provide an alternative to automobile travel." That the language is not *a clear statement* understandable to ordinary citizens proves that the process lacks *public involvement*. To *involve* is totally different than to *inform*.

The intent of the statute is for the public to be *involved* and to this end it is essential that the language be clear. Instead, this jargon lulls the average citizen into believing that the primary purpose of the Honolulu High-Capacity Transit Corridor Project is to reduce traffic congestion from current levels.

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[12] http://www.environment.fhwa.dot.gov/strmlng/linkmgtrans.asp

Lacking an FTA definition of *involvement* we have to fall back on the dictionary definition, which tells us that to *involve* is,

> "To engage as a participant; embroil: *involved the bystanders in his dispute with the police.*
> "To connect closely and often incriminatingly; implicate: *evidence that involved the governor in the scandal.*
> "To influence or affect: *The matter is serious because it involves your reputation.*
> "To occupy or engage the interest of: *a story that completely involved me for the rest of the evening.*"[13]

To make clear the distinction: If you are *involved* in a murder, you may be hanged. If you are only *informed* of a murder you will not be.

It is derelict to omit any discussion of traffic relief relative to today's congestion in the Draft EIS especially since there has been a constant refrain from City officials implying that the purpose and need is for traffic relief.

To be a "clear statement," the purpose and need statement requires it to say that, "It is not the Purpose of the Project to reduce traffic congestion below today's levels; it is to provide an alternative to automobile travel" and, "After the rail transit line opens, traffic congestion will be worse than it is today, though somewhat less than what it might be otherwise."

The NEPA regulations require that, "*Environmental impact statements shall be concise, clear, and to the point ...*"[14] and the purpose and need statement is the complete antithesis of this.

3. Renderings misrepresent reality

See this issue covered under Part II, Insufficient consideration of elevated rail impacts. Pages 2:7

[13] Excerpted from the American Heritage® Dictionary.
[14] 40CFR1500.2 (b)

Febrnary 6, 2009

Part VII — Misrepresentations outside of the Draft EIS

We understand that federal officials do not wish, and are possibly not even empowered, to involve themselves in local politics. However, the current situation concerning the City administration misleading the public is more serious than is usually the case.

When public support for a project has occurred only because of the volominous amount of lies and misrepresentations made by the local agency, then it is incumbent upon the federal agency to not approve such a project until the situation has been mitigated. Certainly this would accord with the spirit and purpose of the environmental statutes and the responsibility of the lead agency.

For example, the federal government directs the Office of Management and Budget (OMB) to:

> *provide policy and procedural guidance to Federal agencies for ensuring and maximizing the quality, objectivity, utility, and integrity of information (including statistical information) disseminated by Federal agencies.*[1]

The NEPA statute and associated laws and regulations are replete with language about "objectivity," "scientific evaluation," and "integrity."

What is the point of the lead agency meticulously ensuring that the integrity of information in the Draft EIS (and the thousands of pages of appendices and technical memoranda) which most of the public will never read, if the lead agency then knowingly evades dealing with the fact that the public has been totally misled about the benefits and disbenefits of the project?

Does the agency want an environmentally destructive alternative chosen over an equally effective, but less costly, and less environmentally intrusive one?

Citizens of the City and County of Honolulu have been consistently misled not only by how the Project will reduce traffic congestion, but also the other purported benefits of the rail transit project, such as the presumption of energy savings, the merits of alternatives, the "success" of Mainland public transportation agencies and the dislike of Oahu residents for new highways.

This has not occurred through the occasional "slip of the tongue" statement but by a deliberate coordinated and continuous barrage of half-truths and deception in public meetings, through millions of dollars of media purchases[2] in TV, radio, newspapers, and in public "bully pulpit" pronouncements by the Mayor, our Congressional delegation, city employees, city transit consultants and their sub-consultants.[3]

City taxpayers and have spent $2.4 million promoting transit through June 30 last year and we expect that when the final report comes in on their spending before the November 4 election, it will add another million dollars to the City total. In addition, the Mayor spent a great deal of his campaign money promoting his rail idea. Others rail supporters, Go Rail Go, Support Rail Transit, and the Carpenters Union between them spent a total of $1.1 million promoting rail in the November 4 referendum.

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1 Public Law 106–554; H.R. 5658). Section 515. See http://www.whitehouse.gov/omb/fedreg/reproducible2.pdf

2 *Mayor, rail supporters outspent opponents.* Honolulu Advertiser. December 9, 2008. http://www.honoluluadvertiser.com/article/20081209/NEWS05/812090355/-1/NEWS05

3 "Proponents and opponents of Honolulu's planned $3.7 billion commuter rail system have saturated Hawai'i airwaves with advertising." http://the.honoluluadvertiser.com/article/2008/Jul/29/ln/hawaii807290361.html

A major financial support for Go Rail Go was Parsons Brinckerhoff.[4] We do not know their total contribution since half of Go Rail Go's contributions were made before the ballot issue was certified and before that time contributions did not have to be enumerated. Countering the over $5 million spent promoting rail was the puny $100,000 spent by the Stop Rail Now organization.

Examples of these misleading statements are detailed in Appendix D.

The most important of the misstatements are those relating to traffic congestion. The public believes that the "purpose and need" of the Project is to reduce traffic congestion in the Corridor to less than today's unbearable levels and also, *incidentally*, provide improved public transportation.

As evidence of this, 73 percent of residents in a Honolulu Advertiser poll of July 27, 2008, said they agreed with the statement,

> *"We need a light rail system in order to reduce traffic congestion and commute times along H-1"* [5]

Their misunderstanding has been encouraged by our elected officials, their employees and contractors. Their public statements to gain support for rail transit constantly imply, or state outright, that the need is for traffic congestion relief. In his 2008 State of the City speech, the Mayor said, "traffic congestion is the most significant challenge to our quality of life."[6] And in a policy statement, "Our residents … are crying for relief from traffic congestion."[7]

Our elected officials (and the public) know precisely what is needed for "improving transportation conditions."

City accuses us of lies and misrepresentations:

The City Administration's Transportation Director Wayne Yoshioka[8] took the position that the opposition (Stop Rail Now and Honolulutraffic.com) was putting out so many "lies and misrepresentations" that the city had to respond to this 'misleading and false information' with the truth." He added that "most of their statements are not true."

This was the most outrageous action by the City yet. On September 3, 2008, the City Council's Executive Matters Committee discussed a bill that would restrict the use of taxpayer funds for advocacy of rail transit by the Administratinn.

We responded that all Honolulutraffic.com's information was footnoted and sourced and if anyone is lying it is the city.

Yoshioka was unwilling to specify what our lies and misinformation were but the Committee Chair eventually persuaded him to agree to supply a list of 20 such "lies and misrepresentations" within five working days. Fortunately, all of this is on video. Three weeks later he produced them.

There is nothing in the list he produced that could reasonably be called a lie or misrepresentation. For example, he states that our comment, "The city admits future traffic congestion will be worse

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4 http://www.honoluluadvertiser.com/article/20081209/NEWS05/812090355/-1/NEWS05
Also see the Campaign Spending Commission Reports: https://nc.csc.hawaii.gov/NCFSPublic/ReportList.php

5 www.honolulutraffic.com/HADV_poll_p9.pdf

6 http://www.co.honolulu.hi.us/mayor/soc2008.pdf

7 http://www.honolulu.gov/refs/rssd/publiccom/honnews06/mayorofferscompromiseontransittaxmasse.htm

8 Since it is a two hour tape we have provided a time line in hours and minutes below:
0:24 — DTS Director Yoshioka begins testimony on bill 01-189 regarding rail transit advocacy.
1.08 — Corporation counsel begins testimony.
1:32 — Cliff Slater begins testimony.
1:40 — Council begins discussion and with legal counsel.
2:08 — End of proceedings.

with rail than it is today" was, "... a cleverly crafted statement that knowingly uses only part of the information available. The Alternatives Analysis shows that a fixed guideway will reduce future traffic congestion between Kapolei and Honolulu by 11 percent."

This is pure spin. He is not denying that traffic congestion will be worse in the future with rail than it is today, only that it will be 11 percent better than it would be without rail. In fact, he and Mike Schneider of InfraConsult finally admitted we were right during a debate on KHVH radio some weeks later. The crucial four minute clip of this admission is available. We have detailed our responses to this and all his other charges in Appendix D.

The issue regarding spin, lies and misrepresentation is that it has been used to garner support for rail. The culmination was that after all this the City could only get 50.4 percent of the voters to approve the rail referendum. It begs the question of what would have been the support if the City had told the truth.

While strictly speaking these misrepresentations are not part of the NEPA EIS process, these misleading activities by Hawaii government officials are of great import. It is one matter to attempt to ensure accuracy and objectivity in the Draft EIS, but can a federal agency evade evidence of local government actions that seek to undermine the EIS process?

What is the point of following the NEPA process to the letter and spirit of the law when local political authorities and their campaign contributors, consultants and all their employees are conspiring to undermine the NEPA process by spending literally millions of dollars lying about traffic congestion relief, among other matters? When Parsons Brinckerhoff is giving $25,000 to fund Go Rail Go efforts to persuade voters to vote for rail with gross misrepresentations of the facts?

It is one thing that the FTA not involve itself in local political matters but it is quite another when their own federal environmental process is being undermined. It is not being ignored — because FTA is fully aware of what has transpired. Rather, the undermining of the process is being evaded.

Appendix D

Following are a few examples of the many claims of prospective traffic relief offered by the City administration.

Mayor Hannemann, KGMB interview, 10/30/2008, "People are tired of being stuck in traffic and they want solutions."

Bill Brennan op/ed in Hawaii Reporter 6/26/08. "Cities with large, well-established rail systems have significantly .. , less traffic congestion ... A comprehensive rail transit system can reduce per capita congestion delays by half, and even greater reductions probably occur on specific corridors." http://www.hawaiireporter.com/story.aspx?6847fd0b-ddee-41e1-82e9-3ded7335de50

Mayor Hannemann's 2008 State of the City Address, "I've said time and time again that traffic congestion is the most significant challenge to our quality of life ... the fixed guideway presented the most effective means of relieving traffic congestion and accommodating the anticipated growth in West and Central Oahu.

Mayor Hannemann said, "Our residents, particularly those in Leeward and Central Oahu, are crying for relief from traffic congestion. A mass transit system represents our best near- and long-term solution to this worsening problem and I'd hate to see our efforts derailed because of

disagreements over who-does-what .... any delays in implementing the tax and completing our planning will delay relief for tens of thousands of commuters who are squandering hours of precious time in traffic." City Hall press release: Mayor offers compromise on transit tax impasse. June 21, 2006.
http://www.honolulu.gov/refs/csd/publiccom/honnews06/mayorofferscompromiseontransittaximpasse.htm

This video of Mayor Hannemann and Rep. Neil Abercrombie's city hall "Traffic sucks!" rally held on December 5th, 2005, typifies the grossly misleading statements emanating from our elected officials.
http://mfile.akamai.com/12891/wmv/vod.ibsys.com/2005/0707/4695365.200k.asx

"[Hannemann] said the [rail] system will help all parts of the island, easing traffic overall because 'there'll be less cars on the road. '"
http://the.honoluluadvertiser.com/article/2005/May/12/ln/ln02p.html

Mayor's Press Secretary: "Slater misrepresents just about everything Mayor Mufi Hannemann, Transportation Services Director Ed Hirata and other supporters of transit have said, from the timing of federal requirements to tax calculations, highway capacity and a rail system's potential to ease traffic congestion."
http://the.honoluluadvertiser.com/article/2005/Aug/10/op/508100321.html

"We're poised to break ground for a long-awaited fixed guideway system that will reduce the time commuters spend in their cars and away from their families ... " Mayor Hannemann, editorial, Honolulu Advertiser, June 29, 2008, Living Green section.

"Mayor Mufi Hannemann chided Lingle at the rally and said the city needs a rail system to alleviate increasing traffic congestion. U.S. Rep. Neil Abercrombie, D-Hawaii, also blasted a possible veto and said that he and the rest of Hawaii have had enough of the traffic problems. He said commuters are fed up and don't need any more "Lingle lanes" filled with traffic congestion."
http://www.bizjournals.com/pacific/stories/2005/07/04/daily18.html?t=printable

"How does rail transit help reduce traffic congestion? ... Building rail transit now is the most cost-effective way to avoid even more congestion in the future ... This brochure is provided by the City & County of Honolulu as part of the public information program required by the Federal Transportation (sic) Administration." City's 8-page 11" x 12" full color glossy brochure inserted in the Honolulu Advertiser, Honolulu Star-Bulletin and the weekly, Mid-Week, circa. October 19, 2008. Combined circulation was about 500,000. To add insult to injury the brochure was marked, "Paid for by City taxpayers."

"The [rail] project shrinks future traffic congestion by more than 20 percent." Mayor Hannemann quoted in the Honolulu Advertiser on November 2, 2008, under a bold above the fold headline, "Study predicts rail to ease traffic 23%". Honolulu Advertiser, November 2, 2008. p. A1

"Rail transit can improve the quality of life for residents across O'ahu by reducing traffic congestion ... and will shrink traffic congestion by at least 21 percent as it matures ... my hope is that this is an action we collectively take for the future -- for the generations of children to come who deserve an island home where they can live, work and raise their families free from the grind of constant traffic gridlock." Senator Daniel K. Inouye. *Draft EIS bodes well for transit.* Honolulu Advertiser, November 2, 2008. p. B1.

"What's more, today's rail technology is already proven and successful, like Vancouver's SkyTrain, the Trax system in Salt Lake City, Portland's MAX Train, and the Washington, D.C. Metro. When each of these systems was first proposed, there were questions and concerns raised. But today, they are vital parts of their cities' overall transportation solutions: reducing traffic ... "

Radio commercials repeated this endlessly in the weeks leading up to the November 4 rail referendum. Of course, the facts are that traffic congestion in these cities since they built rail is as bad as other cities – if not worse, according the Texas Transportation Institute.

The Mayor's behavior during the 2008 mayoral candidates' debates exemplified the refusal of city officials and their contractors to admit that traffic congestion will get worse with rail. During the September 9 debate, Dr. Panos Prevedouros asked the Mayor, "Your own city studies show that traffic congestion in the future, with rail, will be far worse than it is today. Is that true? Yes or No?" The Mayor totally dodged this because he knows full well that the answer is "Yes" but the viewers did not know that traffic congestion will indeed get worse with rail. Watch him duck and dive during this video.

Other aspects of misrepresentations by the city during the rail transit debate follow:

The following transcript is of a one-minute City radio commercial that ran incessantly on many Honolulu radio stations in the months leading up to the referendum vote:

> TRANSCRIPT: *"Will mass transit attract riders in Honolulu? Actually, we already know the answer. Honolulu has the fourth highest transit ridership per capita in the nation. People here already know that mass transit, like the bus, is a great way to deal with traffic, parking and save money. So, how about rail transit, which will be even faster and more efficient? Again, we don't have to guess. Look at how people in cities nationwide are responding to fuel costs and traffic hassles. In Portland, San Francisco, New York and Washington, D.C., rail ridership has increased more than five percent in the last year. In Los Angeles, a city that loves its cars, rail ridership is up over fifteen percent. In Seattle, it's up twenty-eight percent. In Charlotte, thirty-four percent. And in Sacramento, rail ridership has increased forty-three percent in just a year. It's too bad we don't already have rail transit. The next best thing we can do is start building it now. To learn more, visit Honolulu Transit.org."*

The above statistics were repeated in the City's newspaper advertising. For example, the Honolulu Star-Bulletin, October 14, 2008.

The following paragraphs show the city's statement numbered and in quotes followed by our comments. Our data is drawn from the American Public Transportation Association (APTA) website. For comparison calendar years 2007 vs. 2006, the file is found at http://www.apta.com/research/stats/ridership/riderep/documents/07q4rep.pdf The latest available data is that of the 1st quarter of 2008 and the file comparing it with the same quarter of 2007 is at:http://www.apta.com/research/stats/ridership/riderep/documents/08q1rep.pdf

#1: "In Los Angeles, a city that loves its cars, rail ridership is up over fifteen percent."

> For 2007 versus 2006, total public transportation in Los Angeles was down 1.78 percent, heavy rail was up 2.03 percent, light rail was up 0.81 percent and buses were down 2.53 percent. For the first quarter 2008, heavy rail was up 5.37 percent, light rail was up 1.77 percent and bus ridership was down about 7 percent (two categories). Los Angeles total public transportation was down 4.57 percent.

#2: "In Seattle, [rail ridership] it's up twenty-eight percent."

> This is a statement that is accurate but misleading. For 2007, Seattle's light rail was up 3.8 percent and commuter rail commuter rail (*real trains, long distance between stops*) is up 27 percent, but it is a minor issue since it carries just 1.5 percent of all public transportation in Seattle. The primary reason for the great increase in this minor commuter rail line is that there have been extensive increases in commuter rail service during the past two years. See: http://en.wikipedia.org/wiki/Sounder_commuter_rail

#3: "In Charlotte, [rail ridership is up] thirty-four percent."

> Charlotte's rail line did not open until November 2007 and so there is nothing to compare it to. The supposed 34 percent increase is a pure figment of someone's imagination.

#4: "And in Sacramento, rail ridership has increased forty-three percent in just a year."

> For the year 2007, Sacramento's rail was up 1.41 percent over the prior year. For the first quarter of 2008 rail was up 3.12 percent.

The above statements are not only inaccurate but they mislead citizens into believing that recent increases in gasoline prices have driven motorists to public transportation far more than they actually have. The national experience is that the first quarter of 2008 shows a 3.3 percent increase in boardings over the year earlier quarter. Some cities were up slightly more, while others experienced declines.

Source: http://www.apta.com/media/releases/080602_ridership_report.cfm

The City repeated these data in ads placed in local newspapers in 2008, for example, in the Honolulu Advertiser, October 13, 2008. p. *A9*. And since our local newspapers will print the City's official line without any research whatsoever this gets repeated, as for example, in the main editorial of May 15, 2008.

InfraConsult LLC is a consultant to the city whose management is comprised of former Parsons Brinckerhoff employees. They run the "Public Outreach Program" for which they hired Elisa Yadao for $500,000 as its program manager.

Dr Prevedouros had written a paper on 20 reasons why we should choose bus technology. That was criticized by InfraConsult's Managing Director, Michael Schneider, and below we comment on his criticism. The more egregious of his misleading comments are shown below as EXCERPT followed by OUR COMMENT.

> EXCERPT: *"Virtually every city in the U.S. with a population over 750,000 people has both buses and some form of rail technology in operation, construction, or in the advanced planning stage... Every major city in the world, whether a "capital city" or not, has some form of rail system. The size of the rail system planned for Honolulu is appropriate for the community's size."*

OUR COMMENT: The spin here is to use the term "city" whereas all normal discussions of rail systems use "metro area" or "urban area," which are contiguous urban areas almost regardless of political division. Thus, the San Francisco Bay Area contains all of the contiguous urban areas within the Bay Area. Portland's urban area consists of Portland and the surrounding counties.

When we review Honolulu's size relative to other metro areas we find that we are the 56th largest in the U.S. and that if we were to build any kind of rail line we would be the smallest in population size. In fact, most of the metro areas larger than Honolulu do not have rail lines.[9]

The next largest city that has a totally grade-separated rail line powered from a third rail, usually termed 'heavy rail,' is Miami whose population is more than four times that of Honolulu.

The other issue of appropriateness is that of cost. The cost of the proposed Honolulu rail line is out of all proportion to the population and tax base. The table on page 24 hows the relative local tax burden falling on Oahu taxpayers as compared to other communities. Honolulu will likely receive only about 18 percent of capital costs from federal funding.

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[9] List of the 60 largest U.S. Metropolitan Areas from the 2000 Census. Some three more metro areas have added rail since the chart was prepared but that does not change the statement.

As the primary consultants, Parsons Brinckerhoff has been active in spreading misinformation about rail on various radio programs.

For example, on this radio program, Parsons Brinckerhoff's Steve Hogan discussed transit with Dr. Prevedouros, UH Professor of Traffic Engineering, on the Rick Hamada Show on KHVH 830 AM for an hour on May 12, 2008. The full discussion may be heard on the podcast made of it.

During *the radio program Hogan said that it took six lanes of freeway to have the same carrying capacity as rail transit.*

Our comment: A single lane of busway on the New Jersey I-495 carries 32,000 passengers on buses per hour during the peak hours.[10] This lane carries more passengers per hour than any rail line in the U.S. with the sole exception of one line of the New York City subway. So it is nonsense to talk about rail having more capacity than Bus/Rapid Transit.

Further, Parson's Brinckerhoff's own *HOV Manual* says:

> *"(This) comparison of person moving capacities for various U.S. rail and HOV projects...appears to cut through the myth that HOV facilities (e.g. busways) do not have the person carrying equivalent of rail lines. Both modes can serve the person carrying capacity needs of about any corridor in North America."*[11]

Hogan then argued that there was no space to put the HOT lanes in Honolulu.

Our comment: Parsons Brinckerhoff designed the Managed Lane Alternative and included it in the Alternatives Analysis with maps and engineering drawings showing that it fit.

Hogan later tried to belittle the multiple on/off ramps Dr. Prevedouras has proposed for the HOT BRT alternative by saying that on the Tampa Expressway there's no stopping after you get on, until you get off at the other end.

Our comment: The fact is that the Tampa Expressway has multiple on/off ramps and a map of them may be seen on the on/off ramps page. The Expressway's Director of Planning sees no difficulty with having even more on/off ramps.

Then Steve Hogan argued that rail is more fuel efficient than autos on HOT lanes.

Our comment: Only when New York City subways are included using weighted averages do rail transit lines show as more energy-efficient than cars. See the arguments on this issue on page xxx

The efficient systems, such as New York, have a great deal of traffic going in both directions in their core areas in the off-peak while the energy-inefficient systems, such as Miami, tend to be those that are highly directional during the peak hours — full going from suburbs into town in the morning and empty going back out, with the opposite being true in the afternoon while there is little traffic during the middle of the day.

For a meaningful assessment of what Honolulu is likely to experience we must look at the experience of those modern systems built since 1970.

The average rail line is less energy efficient than the automobile (3,496 for cars and 4,329 for light trucks and SUVs) according to the U.S Department of Energy as shown and described in the chart to the left[12] and in other DOE publications.[13]

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[10] Transportation Research Board's Highway Capacity Manual. Table 1-13.

[11] Charles A. Fuhs. *High Occupancy Vehicle Facilities*. Parsons, Brinckerhoff. December 1990.

[12] http://www1.eere.energy.gov/vehiclesandfuels/facts/favorites/fevt_fotw221.html
http://www.carkeys.co.uk/road_test/hyundai/14074.asp

[13] http://cta.ornl.gov/data/tedb27/Edition27_Chapter02.pdf Tables 2.12 & 2.13

While it is still possible that Honolulu's prospective rail line could be more efficient than an automobile this is not likely. It is especially unlikely when the target year for discussion is 2030 and automobiles are getting far more fuel efficient every year and trains are not.

Then Hogan said that even in Tampa the Expressway would today cost 3.5 times what it originally cost to build.

Our comment: There are multiple construction cost indices, such as the Corps of Engineers Civil Works Index for Roads and Bridges, covering Florida from 2003-2008 and none of them show anything higher than a 50 percent increase. In addition, the Figg Bridge Corporation has been recently estimating new facilities in Florida similar to the Tampa Expressway and their current projected costs are less than a 50 percent increase from what the Expressway actually cost. A 350 percent increase is nonsense; it is simply Parsons Brinckerhoff's attempt to justify the preposterously high projected cost of $2.6 billion that Parsons Brinckerhoff used for the MLA.

Anyone believing that Parson's Brinckerhoff's employees are reasonable and objective in informing the public about rail transit and the Managed Lane Alternative should hear the PODCAST of this Rick Hamada Show.

City brochure misleads

The city's widely distributed May 2008 Transit brochure is grossly misleading.. The city prints thousands of these transportation brochures and distributes them to a city wide mailing list in addition to placing it on their website www.honolulutransit.com. Following are our comments on the City's May transportation brochure (takes time to download).

Front page: Top reasons for rail:

> *EXCERPT: Good for MOBILITY -- One train can move 300 people which equals 6 buses or 300 cars! That means one rail line equals 6 lanes of cars.*

OUR RESPONSE: We dealt with this canard in earlier pages.

> *EXCERPT: Good for the ENVIRONMENT -- It's sustainable - rail can be powered by alternative energy like solar, wind or H-power. This means less air and water pollution and fewer green house gas emissions.*

This is a typical environmental appeal which has no substance in fact. As proof of that, there is no mention of these potential power sources in either the Draft EIS or its supporting technical documents. It is another case of spin being good enough for local consumption but not valid enough for submission to the FTA.

> *EXCERPT: Good for the ECONOMY -- The rail project will create 90,000 person years of employment or 11,000 direct and indirect jobs annually. And, building a reliable, dependable, efficient transportation system encourages healthy economic growth.*

OUR RESPONSE: 82 percent of the capital cost and 100 percent of the operating losses will be funded with local dollars. No mention is made of the downside of incurring higher taxes and higher City debt to justify a make-work project.

> *EXCERPT: Good for COMMUNITIES -- Rail encourages managed, orderly growth along the route. Planning where and how communities expand means we can keep the country country.*

OUR RESPONSE: It really means Transit Oriented Development, or heavy subsidies for developers, which has been the case in every other TOD; the subsidies are needed to entice people to live in so-called "vibrant" communities. No mention is made about the subsidies needed and their effect on local taxes.

EXCERPT: "[Houston] Metro says ridership on its light rail system has doubled in 20 months."

OUR RESPONSE – The American Public Transportation Association shows ridership on Houston's light rail was up 6.29 percent 2007 over 2006 and up just 3.08 percent for the 1st Quarter 2008 over the same quarter in 2007. Some doubling.

"The Dallas DART is up 9%. In Los Angeles - a city that loves its cars - rail ridership is up over 15%. In Seattle it's up 28%, in Charlotte 34%, and in Sacramento, rail ridership is up 43% in just a year. Across the country rail ridership is up 11.2%." City advertisement, "Paid for by City Taxpayers," in the Honolulu Advertiser, October 13, 2008. p. *A9*.

Since our local newspapers will print the City's official line verbatim without any research whatsoever, these untruths are repeated, for example, in the Advertiser main editorial of May 15, 2008.

Stop Rail Now's so-called "Lies and Misrepresentations"

This refers to the discussion on page 38 when the City accused Stop Rail Now and Honolulutraffic.com on statewide television of disseminating "lies and misrepresentations." When they finally presented the list to the City Council they called it "Inaccuracies."

The City's listing of our sister operation Stop Rail Now's supposed "lies and misrepresentations" are in larger type bold-faced and flush left. The City's response to our comments is shown underneath each of them. Our responses are shown underneath each of the items but are in small type and indented. We have listed here only those "lies and misrepresentations" attributed to Stop Rail Now.

This exchange took place before the Draft EIS had issued and so our comments related to that time and the Alternatives Analysis.

The following retains the City's original format:

Inaccuracies

Stop Rail Now Ad

Sunday, September 14, 2008 • Honolulu Advertiser· Page A25

1. "The recent GET Tax increase and federal funds will be insufficient to fund rail."

Through the financial plan in the Alternatives Analysis, adequate funding sources have been identified for the approved Kapolei to Honolulu route. The financial plan also includes almost $1 billion in contingencies. The financial plan was thoroughly reviewed by transportation experts with the Federal Transportation Administration (FTA) prior to its release.

There are five reasons for believing the funds will be insufficient:

First, the projected revenues from the GE tax hike will most probably fall short over the 15-year life of the tax given the current state of our economy. They will certainly be no more than that shown as the lower of the three growth scenarios, the "Trend Forecast," in the AA, table 5-4 & 5-7.

Second, the Alternatives Analysis (AA) financial plan, Table 5-8 and the Financial Feasibility Report (FFR) p. 4-4, calls for $1.2 billion in federal funds for the 20-mile option using the Trend Forecast for GE tax revenues.

The fed does not deal in inflation adjusted dollars only nominal dollars. There is no likelihood of us receiving $1.2 billion. In fact, the only FTA assurance that we have in writing is the minutes of an OMPO Policy Committee Meeting (see http://oahumpo.org/PC/pc2004/pc04mm0323.html) where Mr. Rogers, head of FTA's Region IX told the Committee that, "The FTA program office is looking to limit any New Starts funding to no more than $500 million per project." The minutes were accepted as true by the Committee members. This is the only written assurance from the FTA of us getting anything.

An email of 10-7-2008, from the FTA's Paul Griffo to us, reads as follows: "It is far too early to tell whether Honolulu's proposed rail project will receive New Starts funding. The project hasn't yet been accepted into the New Starts Program. "

Third, the plan does not call for operating losses to begin until 2019 (www.honolulutraffic.com/FFR.pdf , p. B-4.). However, according to city officials, plans call for operations to start in 2012. If operations do begin earlier it will increase the subsidies shown in the financial plan.

Fourth, the capital cost estimate for the 20-mile line is about one billion understated and the 28-mile by $2 billion. See www.honolulutraffic.com/costunderstate4.pdf for a discussion of the 1992 rail project, the Miami Metrorail and the San Juan Tren Urbano all adjusted for construction inflation and location.

Fifth, there will likely be change orders and other cost overruns. The average of the most recent FTA evaluation of New Starts Actual versus Projections and Costs showed average cost overruns of 40 percent.

That the "financial plan was thoroughly reviewed by transportation experts with the FTA prior to its release" is no assurance to anyone who has the slightest acquaintance with the FTA's record. The last two rail lines to open, Charlotte and San Juan, both went over 100 percent over projected costs.

2. "For the beginning 20-mile line we are unlikely to get all of the supposed $900 million in federal funds."

The Federal Transit Administration would not have allowed the City to continue with the project if it were not a reasonable estimate. In fact, in the Alternatives Analysis, it was assumed that federal funds would total $700 million. If we receive more, it will be a bonus.

Congressman James Oberstar, chair of the U.S. House Transportation and Infrastructure Committee has twice told the local media he strongly supports this project and mentioned $900 million as a reasonable figure.

2. Dealt with above.

3. "This amount together with the operating subsidy will take at least a 40 percent hike in property taxes."

This is a scare tactic. The subsidy for rail could be funded without any increase in taxes, property or otherwise.

Our statement related to the full Locally Preferred Alternative (LPA) and included operating losses. We estimate that the City's projected cost of the Full Corridor Alignment at $5.1 billion in 2006 dollars (AA, table 5-1) is $2 billion understated (see www.honolulutraffic.com/costunderstate4.pdf) and to that must be added the airport spur bringing the total to $7.5 billion. This will take more than a 40 percent hike in property taxes. See http://www.honolulutraffic.com/railfunding13.pdf which is a spreadsheet using an earlier estimate of $6.4 billion that resulted in a 40 percent hike in property taxes. If the City wishes to disagree, they should be specific.

4. "Automobiles are on average more energy efficient than modern rail lines."

According to the U.S. Department of Energy's 2007 Data Book, rail uses 36 percent less energy per passenger-mile than cars and trucks.

This attempt to confuse the average of rail lines with the *weighted* average of all rail lines, which includes New York, is quite deliberate. They know that New York City's energy efficient subways provide 57 percent of the nation's rail transit ridership and dominate the *weighted* average. We should be comparing ourselves to rail technologies similar to what we would be getting. In fact, whether you take just modern rail lines, or all rail lines including New York City, but use a straight average instead of a weighted average the automobile still comes out ahead with Btu's per passenger mile of 3,445 versus rail's 4,337. They know we are right on this. See this web page: http://www.stoprailnow.com/nwsubenergyuse.pdf.

5. "The city admits future traffic congestion will be worse with rail than it is today."

This is a cleverly crafted statement that knowingly uses only part of the information available. The Alternatives Analysis shows that a fixed guideway will reduce future traffic congestion between Kapolei and Honolulu by 11 percent.

This is pure spin. He is not denying that traffic congestion will be worse than today only that rail will reduce congestion by 11 percent from what it would be without rail.

6. "The city's own Parsons Brinckerhoff studies forecast that with rail, rush hour traffic will be 37% greater than it is today."

This is another cleverly crafted statement that uses only part of the information available. With the expected increases in population and employment in the future, rail transit promises the greatest reduction of this increased congestion.

More spin; he is still not denying that congestion will be worse with rail than it is today.

7. "Bus Rapid Transit and autos on High Occupancy Toll 'HOT LANES' is [sic] the most cost-effective way to reduce congestion and thus reduce pollution and energy use."

This statement has no basis in fact. The Alternatives Analysis compared the costs per users of Managed Lanes and the 20-mile fixed guideway and found that the Managed Lane is between $63 and $50 per user, while the fixed guideway is about $21 per user.

In addition, Managed Lanes would provide approximately 2 million hours of user benefits per year. The 20-mile fixed guideway would provide approximately 12

million hours of user benefits per year. Page 6-6 of the Alternatives Analysis states, "The Fixed Guideway alternative is approximately four times as effective at providing transit user benefits per annualized incremental dollar cost as the Managed Lane alternative."

Our statement refers to the detailed findings of the UHCS Study, which the city has made no attempt to refute. All they have done is personally attack Dr. Prevedouros who led the study. Failing any significant analysis of the UHCS Study by the City we will continue to quote it.

GETTING IT RIGHT

Misinformation about rail

Below are inaccurate statements about rail transit and HOT lanes taken from their source websites. The statements are grouped by category: traffic congestion, financial plan-costs, Managed Lanes-HOT lanes, ridership, travel times, Environmental Impact Statement, population, train speed, route, environment, downtown and Phileas buses.

TRAFFIC CONGESTION

"You may be even more outraged to find that it has never been our elected officials intention to improve traffic congestion." (stoprailnow.com)

One of the goals from the beginning has been to reduce traffic congestion and improve **corridor mobility, which includes reducing travel times and improving travel time reliability.**

Nowhere in the AA is there any sign of intent to reduce traffic congestion below current levels, only to "increase urban mobility" by which they mean by public transportation.

These excerpts from a letter sent by DTS Director Melvin Kaku to Cliff Slater on June 20, 2006, show that the City did not have congestion reduction as a main requirement:

"Projects with the purpose of providing roadway mobility for automobiles and commercial vehicles are outside of the authorization of Act 247; therefore, they will not be considered for the Honolulu High-Capacity Transit Corridor Project …

"While the transit system will reduce the number of drivers on congested roadways within the corridor, the corridor is expected to continue experiencing growth in travel demand. The transportation corridor between Kapolei and the University of Hawaii at Manoa will continue to experience substantial traffic congestion; however, congestion in the corridor is expected to decrease somewhat after the system opens, and grow at a reduced rate after that time because of automobile trips diverted to transit."

All the City hopes to do is to use rail to reduce congestion to levels below what they would be if we did nothing. The AA table 3-12 shows that present peak hour levels on the regular H-1 freeway lanes are 10,960 vehicles. If we build rail the city forecasts 17,414. That will mean a considerable increase in traffic congestion relative to today's levels. If we do nothing (No-Build Alternative), the demand will only increase to 18,049.

FINANCIAL PLAN-COSTS

"Even if Honolulu receives $900 million in federal aid, all of it will be spent in foreign countries or on the mainland. No federal funds will ever reach Oahu." (stoprailnow.com)

This statement is absurd. The largest cost elements of the project are the construction of the guideway, stations and maintenance facility and associated costs for utility relocations and street repaving. All of this work, of course, will be done on-site in Honolulu, as will most of the professional service activities.

> Stop Rail Now finds no record of us saying this. However, it may well be true it is just that we have not researched this issue.

The City cannot afford rail because it will cost $150 million a year to operate and maintain." (stoprailnow.com)

The estimated annual operating and maintenance costs for a fixed guideway are approximately $60 million. The cost of operating and maintaining a bus and rail system will be less than the cost of carrying the same number of riders on a bus only system.

> We can find no record of us having said this. However, it may well be true; we have yet to research it.

MANAGED LANES-HOT LANES

"Engineers for the Tampa elevated toll lanes say an elevated toll road can be built in Honolulu for less than $1 billion." (stoprailnow.com)

According to an e-mail from Linda Figg, whose firm designed the Tampa project, "We (Figg Engineering) have not done any "detailed engineering studies" of what estimates of probable construction costs would be for the elevated structure."

"We simply took those actual cost figures (from Tampa) and escalated the costs to today's time and included the escalations that might be anticipated for construction in Hawaii. The values that Cliff Slater is referencing look like the ball park figures that we determined from that back of the napkin review."

> What they precisely said was that they could not believe that it would cost as much as one billion dollars. Figg Bridge does other work in Hawaii and is familiar with geotechnical and labor conditions. They are also familiar with the proposed route of the HOT lanes proposal. Given that they are not going to perform "detailed engineering studies" for the city for free, their comments are valid and we think reasonable.

"In the 2006 AA, 10-mile Hot Lane performed only a little worse than 20 miles of rail line." (stoprailnow.com)

The fixed guideway is projected to reduce traffic congestion by about 11 percent in the study corridor. The Managed Lane-HOT lane option reduces future traffic congestion by about 4 percent. The fixed guideway is a more cost-effective solution per user benefit than Managed Lanes-HOT lanes (AA, table 6-1).

> We can find no record of this poorly written sentence coming from us.

HOT lanes pay for themselves with toll revenues and federal funds." (various)

Toll revenues would fund only about 20 to 25 percent of the cost of HOT lanes. No other funding sources have been identified.

> We see no reason why toll revenues cannot provide half of the $900 million capital costs and FHWA the other half. Even if FHWA did not fund it, the local taxpayer load $450 million is so incomparably small relative to rail transit that the city could have the state legislature amend Act 247 to allow its use for HOT lanes and still be able to terminate the tax in about four years.

POPULATION

"The rail project is totally out of line for the size of our community." (stoprailnow)

Honolulu is fifth densest among cities with populations of 500,000 or more. We are the only one without a rail system.

> More spin. No one compares "cities" but rather metro areas — contiguous urban areas with logical linkage for sharing urban transportation. Rather than San Francisco the federal government reviews the whole Bay Area. The USDOT's listing of metro areas has Honolulu as the 56th largest and most of the 55 that are larger than us have no rail.
>
> In addition, rail transit's cost per capita for Honolulu is at least seven times the next highest cost per capita among all metro areas and ten times the average.

TRAIN SPEED

"Train is not rapid." (stoprailnow.com)

Rail will achieve a top speed of 55 mph or greater between many stations.

> More spin. We, of course, only deal with average speeds from origin to destination. The city claims they will average 30 mph but that will be a reach and be, more likely, 25-28 mph. In any case, 30 mph is not rapid in comparison to uncongested highway speeds of 60 mph such as the HOT lanes would provide.

ROUTE

"Virtually everyone will have to use buses to get to rail stations. (stoprailnow.com)"

Rail stations will [be] accessible by automobile, bus, bicycle paths and walkways. In the transit corridor, 23 percent of the population and 38 percent of the employment will be within a 10-minute walk of a rail station.

> We do not find it credible that 23 percent of the corridor population will be within a ten minute walk from a station. We will ignore for a moment that a quarter mile is considered by the feds to be the maximum that people will walk to station or bus.

However, we have not made a detailed study of this and if the city has, we will be happy to review it with them and concede that they are right should that turn out to be the case.

"They are delaying the theoretical opening until 2019." (stoprailnow.com)

The projected opening is 2018.

The City's AA Financial Feasibility Report, Table B-4, shows that operating and maintenance costs for the 20-mile project begins in 2019, while the full length system begins in 2020 (Table B-5).

ENVIRONMENT

"The noise from steel on steel is an environmental blight." (stoprailnow.com)

Rail decibel levels are about the same sound as a city bus.

Yes buses are noisy. However, rail has a particularly annoying sound that at 79 decibels @ 50 feet coming by every 1½ minutes, in addition to buses and other ambient noise, makes the situation far worse.

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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DEPUTY DIRECTOR

June 11, 2010

RT2/09-299088R

Mr. Cliff Slater
Honolulutraffic.com, Stop Rail Now
3105 Pacific Heights Road
Honolulu, Hawaii 96813

Dear Mr. Slater:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

Cover Letter

As described in Chapter 2 of the Final EIS, the Airport Alternative is defined as the Project, and is one of the alternatives studied in the document. The identification of the Airport Alternative as the Preferred Alternative was made by the City to comply with FTA's NEPA regulations (23 CFR § 771.125 (a)(1)). Further, FTA's NEPA regulations for projects proposed to be funded with major capital investment funds, the level of detail necessarily increases between the Draft EIS and the Final EIS through preliminary engineering work (23 CFR § 771.123(j)). The Final EIS addresses each of the points of concern noted in your letter. Specifically, Tables 3-9 and 3-10 of the Final EIS compares existing congestion levels to future levels both with the Project and without to provide a point of reference to the reader for future conditions. These tables include traffic volumes, level-of-service, and maximum volume thresholds for individual roadways in the project corridor. Table 3-14 of the Final EIS provides a

comparison of the No Build Alternative and the Project in 2030 and shows that the Project will result in an 18 percent reduction in congestion, as measured by daily vehicle hours of delay (VHD). The environmental benefits and impacts of the Project are detailed in Chapter 4 of the Final EIS. Table 4-1 provides a summary of those impacts and proposed mitigation.

An analysis of the financing of the Project is set forth in Chapter 6 of the Final EIS. Figure 6-3 illustrates forecast transit operating needs from the Highway and General Fund, which includes property tax revenues. As stated in Section 6.4.2 of the Final EIS, overall transit operating and maintenance costs (i.e., the Project, TheBus, and TheHandi-Van) are expected to increase from approximately 11 percent to 14 percent of the City's operating budget. This small increase is typically accounted for in the normal budgeting of available funds and will not by itself result in an increase in property taxes. Financial risks associated with the Project are discussed in Section 6.6 of the Final EIS. The travel forecasting model has been refined since the Draft EIS to add an up-to-date air passenger model (which forecasts travel in the corridor related to passengers arriving or departing at Honolulu International Airport), improved drive access (driving alone or carpooling) module and a better presentation of non-home based direct demand trips (trips that do not originate or end at home). The results are not substantially different than those in the Draft EIS. As stated above, VHD will decrease by 18 percent with the Project versus the No Build Alternative.

The summary section of Chapter 4 in the Final EIS provides a list of technical reports that were prepared for the Project. In addition, various technical reports were used as the basis of the transportation and modeling analysis conducted for Chapter 3 of the Draft and Final EISs. These reports are available from the Department of Transportation Services and on the project website at www.honolulutransit.org.

Chapter 2 of the Final EIS also summarizes the screening and Alternatives Analysis processes that were used to identify and develop the alternatives evaluated in the Draft EIS. The detail requested is provided in the supporting reports listed as references to the Draft EIS. To quote from the FTA "Keys to Efficient Development of Useful Environmental Documents" (US DOT, 2007): The NEPA implementing regulations provide that "[e]nvironmental impact statements shall be concise, clear, and to the point, and shall be supported by evidence that agencies have made the necessary environmental analyses" (40 CFR § 1500.2(b)). This means that the impact statement itself should not contain elaborate and extensive analyses of different types of impacts, but rather, relatively brief descriptions in plain language of the results of those analyses; the brief descriptions are meant to discuss impacts associated with alternatives that were analyzed and presented in comparative form. The Final EIS explains the analysis of the various alternatives considered and environmental impacts of the proposed Project in compliance with NEPA.

According to 23 CFR § 771.130, a Supplemental EIS is prepared when the Administration determines that:

> *(1) Changes to the proposed action would result in significant environmental impacts that were not evaluated in the EIS; or*

(2) New information or circumstances relevant to environmental concerns and bearing on the proposed action or its impacts would result in significant environmental impacts not evaluated in the EIS.

Neither of these instances is applicable to the Honolulu High-Capacity Transit Corridor Project or demonstrated in the comment letter.

Part I – Alternatives Studied

Project scoping was conducted in two phases, as allowed for in FTA SAFETEA-LU guidance. Early scoping was completed during the Alternatives Analysis phase and NEPA scoping was completed after selection of the Locally Preferred Alternative. The process is detailed as follows. The Alternatives Analysis phase, as documented in Chapter 2 of the Final EIS, evaluated a range of modal and general alignment alternatives, including managed lanes, in terms of their costs, benefits, and impacts. The scoping process for the Alternatives Analysis involved a presentation of the viable alternatives to the public and interested public agencies and officials to receive comments on the Purpose and Need, alternatives, and scope of the analysis for the Alternatives Analysis. Scoping followed the FTA process that provides for a culling of alternatives studied in the EIS through an Alternatives Analysis. The following scoping meetings were held as part of the Alternatives Analysis phase of the Project:

- *December 13, 2005: Neal S. Blaisdell Center Pikake Room at 777 Ward Avenue in Downtown Honolulu from 2:00 to 4:00 p.m. (agency scoping meeting)*
- *December 13, 2005: Neal S. Blaisdell Center Pikake Room at 777 Ward Avenue in Downtown Honolulu from 5:00 to 8:00 p.m. (open to the public)*
- *December 14, 2005: Kapolei Middle School Cafeteria at 91-5335 Kapolei Parkway in Kapolei from 7:00 to 9:00 p.m. (open to the public)*

The scoping process initiated for the Alternatives Analysis included a variety of highway, bus and fixed guideway options for consideration. As a result of this scoping effort, the proposed Managed Lane Alternative was expanded. It was revised again during the Alternatives Analysis to improve its performance. Despite the improvements, the managed lane alternative was not able to meet the performance of the fixed guideway.

A second scoping opportunity was initiated in support of the Draft EIS in March of 2007. All meetings held were open to the public:

- *March 28, 2007: Kapolei Hale at 1000 Uluohia Street from 6:00 to 9:00 p.m.*
- *March 29, 2007: McKinley High School at 1039 South King Street from 5:00 to 8:00 p.m.*
- *April 3, 2007 at Salt Lake Elementary School at 1131 Ala Lilikoi Street from 5:00 to 8:00 p.m.*

In this later scoping effort, the public was requested to propose alternatives that would satisfy the purpose and need at less cost or with greater effectiveness, less environmental or community impact and alternatives that were not previously studied and eliminated for good cause. The only alternative that emerged that met these criteria was a fixed-guideway

alternative following an alternative alignment. All reasonable alternatives that emerged from these processes were ultimately evaluated in the Draft and Final EISs. Your letter suggests that a second scoping process was held because the first scoping process was "inadequate or unsatisfactory"; that is not the case. In 2006, FTA issued guidance that stated a scoping process could be held before the Alternatives Analysis with a second scoping process held after the Notice of Intent to prepare an EIS:

According to SAFETEA-LU Environmental Review Process Final Guidance issued jointly by the Federal Highway Administration and FTA: "Certain New Starts project sponsors have advocated publishing a Federal Register notice of intent to prepare an EIS, more accurately called an "early scoping notice," and then conducting the New Starts planning Alternatives Analysis as a super-extended scoping process (so called "Option 1.5"). This option may provide an opportunity to identify and engage participating agencies...earlier, i.e., during the New Starts planning Alternatives Analysis, through the early scoping notice... Under this option, project initiation [scoping process] would occur after the New Starts planning Alternatives Analysis at the start of the environmental review process."

The FTA issued a Notice of Intent to prepare this EIS in the Federal Register on March 15, 2007. All interested individuals and organizations, as well as Federal, State, and Local agencies, were invited to comment on the Purpose and Need to be addressed by a fixed guideway transit system; the alternatives including modes, technologies and alignments to be evaluated; and environmental, social, and economic impacts to be analyzed. The alternatives evaluated in the Draft EIS are the result of the alternatives screening process and reflect comments received during the scoping process, as summarized in the Honolulu High-Capacity Transit Corridor Project National Environmental Policy Act Scoping Report *(DTS 2007). Several scoping comments were received requesting reconsideration of the Managed Lane Alternative that was considered and fully evaluated during the Alternatives Analysis phase and found to perform substantially less effectively than the fixed guideway alternative that was selected for further development in the Locally Preferred Alternative. Because no new information was provided that would have changed the findings of the Alternatives Analysis regarding the Managed Lane Alternative, it was not included in the Draft EIS for further consideration. Had information been provided that demonstrated greater effectiveness, the managed lane alternative would have been reconsidered in the Draft EIS.*

Regarding alternatives studied, the Alternatives Analysis fully evaluated a reversible Managed Lane Alternative and documented that it performed poorly compared to the Fixed Guideway Alternative on a broad range of metrics. Based on public comments received on the Draft EIS, additional information, as summarized from the Alternatives Analysis Report *and* Honolulu High-Capacity Transit Corridor Project Alternatives Screening Memorandum, *has been added to Chapters 2 and 8 of the Final EIS to explain why this alternative was rejected. Both the Alternatives Analysis Report and Screening Memorandum were available to the public. The following is a quote from Chapter 8, Section 8.6.12, of the Final EIS:*

> *"A number of commenters stated that the alternatives studied did not properly address other options for the corridor. In particular, there was a concern that the Managed Lane Alternative was not included in the Draft EIS as an alternative."*

The process of alternatives screening and selection is discussed in Chapter 2 and in Section 8.6.1 of the Final EIS. As discussed, alternatives were developed through three general phases: (1) the FTA Alternatives Analysis process; (2) the selection of a Locally Preferred Alternative; and (3) the NEPA scoping and Draft EIS process. The initial screening of alternatives is documented in the Honolulu High-Capacity Transit Corridor Project Alternatives Screening Memorandum *(DTS, 2006a) (Screening Memorandum). The subsequent FTA Alternatives Analysis process is provided in the* Honolulu High-Capacity Transit Corridor Project Alternatives Analysis Report *(DTS 2006b) (Alternatives Analysis).*

The initial screening process considered a wide range of alternatives, including "construction of a 'managed' two-lane elevated structure for transit vehicles and potentially carpools, as well as single occupant vehicles willing to pay a congestion-based toll," as described on page S-2 of the Screening Memorandum. The screening results for the Managed Lane Alternative are discussed on pages C-4 through C-5 of this report. The analysis found that the transit mode share under the Managed Lane Alternative would hold constant with the No Build Alternative; the automobile mode share would increase; and the bike and walk mode share would decrease. Vehicle hours traveled would decrease, while vehicle miles traveled would increase slightly.

This initial screening process identified four alternatives that were presented at scoping meetings held to obtain public input. As described on page 5-2 of the Screening Memorandum, one of the alternatives recommended for further evaluation was the Managed Lane Alternative. The Managed Lane Alternative originally was described as follows:

> *"The Managed Lane Alternative would include construction of a two-lane grade-separated facility between Waiawa Interchange and Iwilei for use by buses, paratransit vehicles and vanpool vehicles (see Figure 5-1). The lanes would be managed to maintain free-flow speeds for buses, while simultaneously allowing High-Occupancy Vehicles (HOVs) and variable pricing for toll-paying single-occupant vehicles. Intermediate bus access points would be provided in the vicinity of Aloha Stadium and Middle Street. Bus operations utilizing the managed lanes would be restructured to use the Managed Lane and enhanced to provide additional service between Kapolei and other points Ewa of Downtown, through to the University of Hawai'i at Manoa."*

The scoping process resulted in the revision of this proposed alternative. As discussed on page 6-1 of the Screening Memorandum:

> *"Based on scoping comments, a second operational option was included under the Managed Lane Alternative. The initial option proposed a two-lane grade-separated facility between Waiawa Interchange and Iwilei which would operate as one lane in each direction at all times of the day. The second option proposes similar infrastructure, but it would operate as a reversible facility with two lanes traveling Koko Head during the morning peak period, and then reversing to travel Ewa in the PM peak period. Both operational options would include restructured and enhanced bus operations by utilizing the managed lanes to provide additional service between Kapolei and other points Ewa of Downtown, and both would be managed to maintain free-flow speeds for buses. Providing that enough capacity existed, High-Occupancy Vehicles (HOVs) and toll-paying single-occupant vehicles would also be allowed to use the facility under either*

scenario; however, it is possible that under the initial option (one lane in each direction), there would not be enough excess capacity to allow toll-paying single occupant vehicles and still maintain reasonable speeds. Intermediate access points would be provided in the vicinity of Aloha Stadium and the Keehi Interchange."

This alternative was further developed in the Alternatives Analysis Report, with additional features added to maximize the performance of the alternative, as discussed on page 2-4:

"The Two-direction Option would serve express buses operating in both directions during the entire day. The Reversible Option would serve peak-direction bus service, while reverse-direction service would use H-1. Twenty-nine bus routes, with approximately 93 buses per hour, would use the managed lane facility during peak hours for either option. One limited-stop route and one local route would continually operate in the managed lane. A total of 27 peak-period express routes would operate in the peak direction using the managed lane facility. Of these, three would be new express routes serving developing areas and nine would be new routes developed for exclusive use of the managed lane. The nine new managed lane express bus system routes would originate from Kalaeloa, Kapolei, or Central Oahu and terminate at the Alapai Transit Center, Waikiki, or UH Manoa. Other peak-period, local and limited-stop routes would follow a route similar to the current structure but would use the managed lane for the line-haul portion of the route.

"A toll structure has been developed that ensures that the managed lane facility would operate to maintain free-flow speeds for buses. To maintain free-flow speeds in the Two-direction Option, it may be necessary to charge tolls to manage the number of HOVs using the facility. For the Reversible Option, three-person HOVs would be allowed to use the facility for free, while single-occupant and two-person HOVs would have to pay a toll."

As discussed on page 3-8 of the Alternatives Analysis Report, the enhanced bus system would include an increased fleet size, estimated at 321 buses beyond the existing fleet for the two-direction managed lane facility and 381 buses for the reversible managed lane facility, to provide a sufficient fleet to ensure that the alternative would function as planned.

1. Reversible Managed Lane Alternative

The Alternatives Analysis Report estimated total capital and operating costs for the Managed Lane Alternative. As discussed on page 2-16, capital costs for the Managed Lane Alternative were estimated to range between $3.6 and $4.7 billion, of which $2.6 to $3.8 billion would be for construction of the managed lanes. Transit operating costs for the Managed Lane Alternative would range between approximately $251 and $261 million as a result of additional buses that would be put in service under that alternative. These costs do not include the cost of maintaining the managed lane facility. Capital costs for the Fixed Guideway Alternative, including bus system costs, would range between $5.2 and $6.1 billion for the Full-corridor Alignments, of which $4.6 to $5.5 billion would be for the fixed guideway system. The costs would be $4.2 billion for the 20-mile Alignment, of which $3.6 billion would be for the fixed guideway system. Operating costs for the Fixed Guideway Alternative in 2030, in 2006 dollars, would be approximately $192 million. The total operating costs for the Fixed Guideway

Alternative, including the bus and fixed guideway, would range between approximately $248 and $256 million.

The capital cost of the Managed Lane Alternative thus is potentially somewhat lower than the 20-mile Fixed Guideway Alternative and significantly lower than the Full-corridor Alternative. Operating costs would be slightly higher. These cost factors were considered in conjunction with other project goals in evaluating the alternatives.

With respect to transit travel time benefit, the Managed Lane Alternative options would improve some trips that were particularly well-served by the managed lanes. In general, the Managed Lane Alternative would increase transit travel times by increasing traffic on the overall roadway system and creating more delay for buses. The H-1 Freeway leading up to the managed lanes would become more congested because cars accessing the managed lanes would increase traffic volumes. Significant congestion would occur where the managed lanes connect to Nimitz Highway at Pacific Street near Downtown. Much of the time saved in the managed lane itself would be negated by the time spent in congestion leading up to the managed lane, as well as exiting the lanes at their downtown terminus. Furthermore, areas that are not directly served by the managed lane would not experience much positive change from the No Build Alternative. As discussed on page 3-14, the Alternatives Analysis Report found that, "although the Managed Lane Alternative would provide some travel-time improvement for certain areas, it has significant limitations with regard to improving travel times or transit service for a broader customer base.

As discussed on page 3-17, transit ridership would increase only 5.3 to 6.4 percent over the No Build Alternative, a small increase compared both to the cost of the Managed Lane Alternative and the increase that would result from the Fixed Guideway Alternative, which would increase transit ridership by 21 percent for the 20-mile alignment.

The volume of peak-hour vehicles in key areas would actually increase under the Managed Lane Alternative compared to the No Build Alternative. As discussed on page 3-27, the Fixed Guideway Alternative would reduce the number of vehicles by 3 to 12 percent.

With respect to the goal of providing equitable transportation solutions that meet the needs of lower-income transit-dependent communities, the Alternatives Analysis Report noted that the Managed Lane Alternative, "would not substantially improve service or access to transit for transit-dependent communities, as buses that use existing HOV facilities would be routed to the managed lane facility but would continue to be affected by congestion in other parts of their routes. Arterial congestion would increase in the study corridor with the Managed Lane Alternative, making bus access to the managed lanes less reliable" (page 6-8).

The Alternatives Analysis Report also considered consistency with existing land use planning and regional transportation planning. On page 6-13, the report concluded that the Fixed Guideway Alternative, "best serves the areas of Oahu that are designated for future growth and development. It is also the only alternative that is consistent with regional transportation system planning defined in the 2030 Oahu Regional Transportation Plan *(OMPO 2006a)."*

The evaluation of alternatives inevitably involves trade-offs. As stated on page 6-13 of the Alternatives Analysis Report, the "greatest trade-off among the alternatives is between the transportation benefit provided and the cost to implement alternatives....The Managed Lane Alternative provides slightly more benefit [than the Transportation System Management (TSM) alternative, which had little effect on traffic], but at a substantial cost. While the Fixed Guideway Alternative would have the highest cost, it is also the only alternative that would provide a substantial transportation benefit, measured both by the benefit to transit users and in the reduction in congestion compared to the No Build Alternative."

The November 2006 Alternatives Analysis Report provided information about all alternatives considered, including the Managed Lane Alternative. As stated in the Summary of the Alternatives Analysis Report, "the Managed Lane Alternative would provide some travel time improvements between selected origins and destinations that are well served by the facility, but in many cases the travel time savings experienced is offset by the increased congestion experienced before entering and upon exiting the facility." The summary also states that the Managed Lane Alternative would "generate the greatest amount of air pollution, require the greatest amount of energy for transportation use, and would result in the largest number of transportation noise impacts. It would provide little community benefit, as it would not provide substantially improved transit access to the corridor." Additionally, Table 6-3 in Chapter 6 of the Alternatives Analysis compares each of the alternatives studied in the Alternatives Analysis, including the Managed Lane Alterative, in relation to project goals and objectives. This table shows that the Fixed Guideway Alternative performs the best when considering all the objectives related to the goals of improving corridor mobility and improving transportation equity.

The Alternatives Analysis findings are also summarized in Table 2-2 in Chapter 2 of the Final EIS. The Managed Lane Alternative is discussed in Section 2.2.2 of this Final EIS. As stated in the Final EIS and supported by the lengthy analysis that preceded the preparation of the Draft EIS, the Managed Lane Alternative was not pursued because the Managed Lane Alternative would not have achieved project goals and objectives, would not result in substantially fewer environmental impacts, and would not be financially feasible. For all of these reasons, it was not advanced to consideration in the EIS. The City Council eliminated the Managed Lane Alternative from consideration when it selected the Locally Preferred Alternative on December 22, 2006. The Council's selection was signed into law as Ordinance 07-001.

Comments received about the Managed Lane Alternative referenced in the Draft EIS suggested there were significant differences between the alternative studied in the Alternatives Analysis and an ideal managed lane option. However, there was no substantial difference between the alternatives proposed in comments and those studied in the Alternatives Analysis that would have resulted in a different outcome. The primary concern raised about the Alternatives Analysis alternatives was that they did not allow access other than at the beginning and end of the facility. That is a misunderstanding of the Alternatives Analysis alternatives. Both provided access at Aloha Stadium and Middle Street to allow connections to intermediate points along the corridor. Any additional access points would substantially increase the cost of the facility because of right-of-way and structure costs and would affect the level-of-service provided by the investment.

Also questioned in the comments was the provision of a congestion pricing system that would make the facility available to single occupant vehicles or those with two occupants at a

cost that would rise during periods of high demand. In both cases, the Managed Lane Alternative evaluated a pricing option, and the two-lane reversible alternative description stated that, "A toll structure has been developed that ensures that the managed lane facility would operate to maintain free-flow speeds for buses" (Alternatives Analysis Report, page 2-4). While there may be some minor details of the proposed alternatives that differ from the Alternatives Analysis alternatives, the evaluation assesses the concept fairly in the context of the Project's Purpose and Need.

In addition, the statement in Chapter 2 of the Draft EIS that "the Managed Lane Alternative would provide slightly more benefit [than the TSM] at a substantial cost" is supported by information provided in Table 2-1 of the Draft EIS. As shown in this table, the cost per hour of transit-user benefit compared to No Build is $13.54 for the TSM Alternative and $50.34 to $63.42 for the Managed Lane Alternative whereas the reduction in vehicle hours of delay and daily islandwide transit trips are comparable between the two alternatives. This supports the statement that the Managed Lane Alternative provides benefits at a "substantial cost." As further shown in Table 2-1 of the Draft EIS, the cost per hour of transit-user benefit for the fixed guideway project compared to the No Build Alternative is $21.32 to $27.05.

The Transit Task Force was created to assist the City Council in selecting the locally preferred alternative. Page 2 of 7 of the Task Force Report states: "The Task Force finds that the Alternatives Analysis' presentation and assessment of [the Managed Lane] alternative were fair and accurate, however it may well be that operational variations of this alternative could make it more attractive and/or feasible than the specific version considered." The operational variations discussed by the Task Force were focused on improving bus operations on the managed lane. The Alternatives Analysis Report (p. 3-13) indicated that the bus would operate very well while on the managed lane system, but would not be able to maintain performance once it transitioned to the local street network. Since the primary issue with buses was the performance on local streets, the suggestions of the Task Force were not substantive in improving the managed lane alternative performance overall and would not have resulted in a change in the relative merits of the alternatives evaluated. Furthermore, "The Task Force did not identify any additional information that the Council must obtain before proceeding [to select a Locally Preferred Alternative]."

a) Zipper lane: As discussed in the Chapter 5, Alternative 3b of the Detailed Definition of Alternatives Report (2006), the reversible lane Managed Lane Alternative provides three managed/HOV lanes in the peak direction, which is sufficient to satisfy the demand for restricted lanes. Eliminating the zipper lane frees up two off-peak direction lanes – one HOV and one general purpose lane. In other words, it was not needed to accommodate the demand in the eastbound direction. Additionally, Table 3-11 of the Alternatives Analysis Report showed that westbound demand during the a.m. peak hour at the Kalauao Screenline would increase from approximately 7,600 vehicles per hour (vph) in 2003 to approximately 10,600 vph in 2030 with the Managed Lane. While the demand in the reverse direction would increase by approximately 40 percent, the peak-direction demand would increase by only 30 percent. Eliminating the zipper lane while evaluating the reversible managed lane alternative provided the greatest benefit to freeway users by increasing capacity in both directions. Access ramps were provided at several locations. Park-and-ride facilities and bus stops were included to maximize transit use, providing the alternative the greatest opportunity to generate transit user

benefits while reducing traffic congestion. However, as stated in the Alternatives Analysis and Draft and Final EISs, the Managed Lane Alternative was less effective at reducing congestion than the Fixed Guideway Alternative.

b) Managed Lane Alternative capital costs: The engineering cost estimate for a two-lane reversible managed lane facility, which was calculated following the same rigorous cost estimating process used for the Fixed Guideway Alternatives, was $2.6 billion in 2006 dollars. The City Council's Transit Advisory Task Force reviewed the Alternatives Analysis and concluded in their report of December 14, 2006 that the assessment of each alternative was "fair and accurate" and that capital cost estimates were compiled using the same methodology and unit cost and that the construction cost estimates were fairly and consistently prepared. Shortening of the Managed Lane Alternative, whether to 14 miles, or 10 to 12 miles, would not have increased the benefits to the traveling public compared to the alternative evaluated.

Regarding the costs of the H-3 Freeway, according to construction cost indices prepared by the Washington State Department of Transportation, construction costs doubled between 1997 (the year construction ended on the H-3 Freeway) and 2006 (the year of the Alternatives Analysis). If construction of the H-3 Freeway had begun in 2006, that project would have cost approximately $2.6 billion. In addition, both the H-3 Freeway and the Managed Lane Alternative face unique situations that affect cost estimates. Construction of the Managed Lane Alternative would have occurred in a heavily developed corridor. As a result, there would be substantial disruptions to traffic and utilities, both of which add to the time, and thus cost, of a project. The H-3 Freeway was built in an undeveloped part of the island and while it had its own challenges, expensive traffic and utility disruptions were minimal.

Regarding the Tampa Expressway, the Task Force compared the Managed Lane Alternative to the Tampa Expressway. The designer of the Tampa Bay facility herself admitted that to apply such an estimate without detailed consideration of the many differences between the two locations is not reasonable. For clarification, the Tampa Bay elevated toll lanes extend only 5.8 miles within the 10-mile expressway. The costs quoted are from 2002, long before the costs of materials and construction rose dramatically after 2004. Furthermore, the corridor within which the Tampa Bay lanes are built required no right-of-way, had no significant utility conflicts, no major structures or crossings, and was built in much more favorable geotechnical conditions than exist on Oahu. In addition, real estate costs between the two locations are different, with costs being substantially higher in Honolulu. As stated in the Transit Task Force Report (dated December 14, 2006) Paul Santo, HDOT Highways Division, stated that there are substantial differences in cost for bridge construction between Hawaii and the mainland US. At that time, the State DOT Bridge Section used $400 to $500 per square foot for planning purposes whereas "most highway agencies on the mainland use $100 to $200 per square foot with some even below $100. He believes the high cost in Hawaii is due to its location and the lack of competition." The Transit Task Force Report stated that "the committee concluded that the projects are sufficiently different (actual costs versus projected costs with contingencies; available, accessible ROW vs. construction in actively used highways; no utilities relocation vs. extensive relocations) as to make the comparison unreasonable."

An increase in the number of lanes on the facility would not have substantially changed the findings of the analysis. It would have increased the cost and marginally increased freeway capacity, but the arterial system would still have experienced increased congestion, resulting in total systemwide congestion similar to or worse than the No Build Alternative and substantially worse than the Fixed Guideway Alternative.

Any increase in the number of access points to the facility would result in significant additional right-of-way requirements and additional costs beyond the $2.6 billion cost estimate (2006 dollars). The geometric implications of building additional ramps and the structures that are needed to support them are significant. The elevated structure would need to be widened beyond the two full travel lanes to accommodate a deceleration lane approaching the ramp and an acceleration lane rising to it. These will be carried at a full lane width at the full height of the facility for between 600 and 1000 feet before the ramp descends from the facility or after the ramp rises to join it. These improvements add substantial additional cost to the project, make it more difficult to build and increase its impact on the nearby communities.

c) Managed lane Alternative operating costs: The approach used to develop the costs of the managed lane was the same as for all other alternatives.

d) Effects on vanpools: According to the data in the 2008 Transportation Energy Data Book, vanpools provided less than 2 percent as many passenger-miles of service as transit vehicles. As such, they do not provide a significant alternative to transit service. The benefits of reduced congestion that will be provided by the Project also will benefit any vanpool operations in the corridor.

e) Ingress/egress: As shown in Figures 2-1 and 2-2 of the Alternatives Analysis Report, there were four access locations in the managed lane alternative. The primary issue with access is that too much access may reduce the performance of the facility as a result of weaving and merging traffic and too little access makes the facility unavailable to many potential users. The access locations identified in the alternative were designed to serve the primary population centers in the corridor at the most desirable locations for access. The other side of the access question is that it introduces additional costs to the facility and creates right-of-way, relocation and general disruption of the communities where they are located. To clarify, each access location requires acceleration and deceleration roadways. Each requires an additional lane approaching an exit ramp and a lane following the on-ramp leading to a merge with the mainline lanes. Deceleration and acceleration require about 1,000 feet each, including transitions if high speeds are to be maintained through the diverging and merging maneuvers. That means each access location requires about 2,000 feet of an additional lane on the elevated structure (i.e., a wider structure by about 12 feet than needed for the mainline only) in addition to the property impacts on the ground and the necessary roadway features where the ramping system joins the surface roadways.

The Purpose and Need of the Project in Chapter 1 states that the selected alternative must improve transportation mobility, reliability and equity. The necessarily limited number of access points, even if strategically placed as in the Alternatives Analysis, provides convenient access to only a select population. The Managed Lane Alternative

cannot guarantee high performance once the vehicle leaves the managed lane itself, offering no improvement to reliability under congested conditions. Limiting access through the high tolls (up to $6.40 during peak periods as noted on page 5-11 of the Alternatives Analysis) required to maintain free-flow speeds is also not consistent with an equitable solution given most people's inability to pay.

f) Due diligence: Development of costs for the Managed Lane Alternative followed the same approach used in establishing the costs of the Fixed Guideway Alternative. The City did complete due diligence both in Hawaii and through its consultant Parsons Brinckerhoff (PB) regarding the use of appropriate costs of the managed lane alternative and the comparison of construction costs between Tampa Bay and Honolulu. Costs of bridge construction were verified and corroborated through PB contrary to the comment letter indication of an "understanding that they were not". The findings of the Transit Task Force Report cited above are one example of such corroboration. Further corroboration is available from FTA's Project Management Oversight Contractor (PMOC), Booz Allen Hamilton, which prepared a Cost Validation Analysis and Report, May 2007. In response to concerns regarding the estimate procedures for the Managed Lanes vs. the proposed Fixed Guideway, cost estimates for both alternatives were compared to identify any potential cases of analysis bias in favor of one model alternatives over the other. Two comparison activities were completed, a comparison of detailed unit costs, and a comparison of the cost build-up process for the Managed Lanes and Fixed Guideway alternatives. The PMOC determined both the unit costs and the cost build-up process were exactly the same for the Managed Lanes and Fixed Guideway alternatives. No evidence was found indicating a bias in favor of one modal alternative over the other.

g) Managed Lane Alternative in the EIS: The Alternatives Analysis fully evaluated the Managed Lane Alternative and documented that it performed poorly compared to the Fixed Guideway Alternative on a broad range of metrics, for reasons stated previously in this response letter. The analysis is summarized in Chapters 2 and 8 of the Final EIS. As explained previously and shown in Table 6-3 of the Alternatives Analysis Report, the Managed Lane Alternative would perform poorly at addressing the purpose and need for the Project. These findings are further summarized in Chapter 2 of the Final EIS.

As stated previously, the requirements for the preparation of a Supplemental EIS are not applicable to the Honolulu High-Capacity Transit Corridor Project.

2. 2003 BRT Project

Your letter references the 2003 Bus Rapid Transit Project. This proposal was a variation on the Transportation System Management (TSM) Alternative that was evaluated in the Alternatives Analysis. While the alternative was cost effective, its overall system benefit was very low. Dynamic pricing was included in the analysis of the Managed Lane Alternative, which found that a very high toll would have to be paid that would limit access for many users.

3. The EZway Plan

Regarding the EzWay Plan referenced in your letter, which included a 15-mile, 3-lane viaduct was developed as a hybrid of a plan for elevated lanes and some form of rubber-tire-on-

concrete transit system. This concept was similar to the Managed Lane Alternative, as described in Chapter 2 of the Alternatives Analysis, which accommodated both single occupant and transit vehicles, and which was thoroughly evaluated in the Alternatives Analysis. The main difference with the reversible Managed Lane Alternative was that it eliminated the toll element for single occupant vehicles. The EzWay concept was proposed by a mayoral candidate for consideration just prior to the release of the Draft EIS and the mayoral City of Honolulu election. It represented a subtle variation on the Managed Lane Alternative (i.e., no tolls would be allowed) of the Alternatives Analysis, but did not provide a substantive departure from the work completed previously. There may be many other versions of this type of system with minor adaptations to suit one or another special concern. In the end, however, they all face similar challenges as a primary solution to Honolulu's transportation problems. Specifically, they do not address the Purpose and Need of the Project, which aims to reduce congestion, increase the reliability of the transportation system, serve future land use plans, and improve transportation equity in terms of the fairness of and access to the transportation system. The other alternatives also would not offer an alternative to private automobile travel, an element of the purpose of the Project.

Part II – Consideration of elevated rail impacts

The Draft and Final EISs present the potential environmental impacts of the proposed action. These are presented in Chapters 3 and 4 of the Draft and Final EISs and summarized in the Executive Summary of the Final EIS.

The Draft and Final EISs present the environmental impacts of the Project on the built environment. The following resources of the affected built environment were analyzed in the following sections of the Draft EIS: transportation system (Chapter 3); land use (Section 4.1); economic activity (Section 4.2); acquisitions, displacements, and relocations (Section 4.3); community services and facilities (Section 4.4); neighborhoods (Section 4.5); environmental justice (Section 4.6); visual and aesthetic conditions (Section 4.7); noise and vibration (section 4.9); energy and electric and magnetic fields (section 4.10); and hazardous waste and materials (Section 4.11). In fact, the majority of the environmental analysis presented in the Draft EIS pertains to impacts on the built environment versus the natural environment. The potential impacts of the Project on the built environment have been thoroughly analyzed in the environmental process, and those results are presented in the Draft and Final EISs.

The Project is located in Honolulu; therefore, none of the listed locations have direct applicability. The New York system is now an obsolete construction technology. Neither the Miami nor San Juan systems have generated additional significant adverse impacts that were not addressed in the environmental review documents for those systems. The Embarcadero was an elevated highway, more akin to the elevated traffic lanes preferred in the comment. One of the reasons it performs poorly is that it does not serve segments of the corridor where congestion is worst. Furthermore, these examples do not suggest there would be additional significant impacts that have not already been disclosed in the Draft or Final EISs.

Visual renderings

Figure 4-27 in the Draft EIS has been revised for the Final EIS. This figure (now Figure 4-28) shows the column located within a raised median and is a correct rendering of the Project

based on current design drawings. The Project will not be as large as depicted in the drawing you provided nor will it include barriers between lanes as shown in your letter

The Project will not construct any structures in the vicinity of University Avenue. The Project has logical termini at East Kapolei and Ala Moana Center and independent utility from any extensions that may be constructed in the future, including a possible extension to the vicinity of University Avenue. The future extensions will not be constructed as part of this Project, thus they are not required to be evaluated under Chapter 343 of the Hawaii Revised Statues and NEPA as part of the Project (Please note that the potential future extensions are discussed in the cumulative impacts sections of Chapters 3 and 4 of the Final EIS). Thus, the graphic of Varsity Station included in the letter does not represent the Project.

The next graphic included in the letter does not adequately represent the Project. Figure 4-28 of the Draft EIS illustrates the Project on Dillingham Boulevard near Honolulu Community College and Kapalama Station Area. A 3-foot parapet wall is included in project design along the entire alignment. As such, the effects of the parapet wall are shown in each of the simulations provided in Section 4.8 of the Final EIS.

Visual and aesthetic conditions are discussed in Section 4.8 of the Final EIS. The Project will be set in a primarily open urban context where visual change, including shade and shadow, is expected and differences in scales of structures are typical (e.g., new high rise buildings). The Final EIS acknowledges that the fixed guideway and stations will be elevated structures, and thus will result in noticeable changes to existing views and in the foreground of these views. This change will also affect the location and extent of shadows.

The analysis acknowledges that shadow impacts along the alignment will vary with orientation, height of the stations and guideway, and the height of surrounding trees and local development (see Section 4.8.3 from the Final EIS). Shade and shadow effects are correctly illustrated in the simulated views included in Section 4.7 of the Draft EIS and Section 4.8 of the Final EIS.

The intent of the comment about the "ugliness" of straddle bents is unclear as there is no noticeable difference between the two pictures shown in the comment. Recognizing the visual concerns about the Project, however, the following measures will be included with the Project to minimize negative visual effects and enhance the visual and aesthetic opportunities that it creates:

- *Develop and apply design guidelines that will establish a consistent design framework for the Project with consideration of local context.*
- *Retain existing trees where practical and provide new vegetation.*
- *Replant trees close to their original locations.*
- *Shield exterior artificial lighting.*
- *Coordinate the Project design with City transit-oriented development planning and Department of Planning and Permitting.*

Part III – The Locally Preferred Alternative

The Project is defined in the Final EIS as a 20-mile fixed guideway from East Kapolei to Ala Moana Center. In February 2007, the City Council passed Resolution 07-039, which directed the first construction project to be fiscally constrained by anticipated funding sources and to extend from East Kapolei to Ala Moana Center. The Project has logical termini and independent utility from any extensions that may be constructed in the future. The potential future extensions are discussed in the cumulative impacts sections of Chapters 3 and 4 of the Final EIS. The potential future extensions are not part of the Project, thus they are not required to be evaluated under Chapter 343 of the Hawaii Revised Statues and NEPA. Under NEPA, environmental analysis is only required when there is a proposed action by a federal agency.

Here, because the potential future extensions are not proposed for implementation at this time, they are not part of the Project studied in the Final EIS. While a statement may have been made about a broader project concept, scoping is an early and open process for determining the scope of issues to be addressed and for identifying the significant issues related to a proposed action. Among other things, the scoping process determines the scope and the significant issues to be analyzed in depth in the environmental impact statement. The scoping process is part of the environmental review process that led to the identification of the Project. The broader project concept, which includes extensions to Waikiki and the University of Hawaii at Manoa, are not part of the Project; and therefore, must be the subject future environmental study if it is ever built. The extensions are addressed in Sections 3.6.2 and 4.19.3 of the Final EIS under Cumulative Effects, because while they are not part of the Project, they may be considered a reasonably foreseeable future action. It would be premature to undertake an environmental analysis of the extensions (beyond the analysis conducted as part of the Alternatives Analysis and in the cumulative effects sections of Chapters 3 and 4) because they are not part of the proposed action to be taken by the City and FTA. The City has not requested funding from FTA or any New Starts approvals for the future extensions of the elevated rail system. If and when local funding becomes available and future extensions are proposed for implementation, environmental analysis of the extensions and appropriate alternatives analyses will be undertaken at that time.

The Final EIS describes the total extent of the proposed Federal action of construction and operation of a fixed guideway transit system between logical termini in East Kapolei and Ala Moana Center, a project included in the Oahu Regional Transportation Plan 2030. There is no segmentation between a Federal and local undertaking. Possible future extensions from East Kapolei to West Kapolei, Salt Lake Boulevard, and from Ala Moana Center to UH Manoa and Waikiki are addressed in the Final EIS as cumulative effects in Chapters 3 and 4. The extensions represent elements of the long-range plan that are not part of the Project or proposed action. The commenter suggests presenting an evaluation of an action that is not proposed for implementation, which would be a violation of both Chapter 343 of the Hawaii Revised Statues and NEPA.

Chapter 4 of the Final EIS includes an evaluation of the cumulative effects of the Project with other past, present, and reasonably foreseeable actions, including the future extensions. When the planned extensions are evaluated in the future, a range of alternatives and complete analysis of potential impacts will be conducted.

Future extensions are not precluded by the Project identified in the Draft and Final EISs. The 35-foot-high station at Ala Moana Center is a logical terminus for the Project, which will serve the shopping center and area properties. In the future, when funding is available, the extension would be designed to best accommodate the possibilities available at that time. The high level option over the shopping center is still available and does not obviate the need for the 35-foot option built now. There are operating plans for the system that will continue to rely on the 35-foot station even after an extension is built. If a future extension is constructed beyond the Ala Moana Center, it is preliminarily proposed that the branch lines would have longer headways than the core system, and service that terminates at Ala Moana Center would use the lower platform, while through service would use the upper platform. Riders traveling towards UH or Waikiki would use the upper platform, while those traveling to Ewa could use either platform.

The Draft EIS provided estimates of cost-effectiveness for those build alternatives addressed in the document, namely three fixed guideway alternatives from East Kapolei to Ala Moana Center. The cost-effectiveness discussion in the Final EIS has been revised since the Draft EIS to reflect updated modeling and financial information. In addition, cost-effectiveness is only presented for the Airport Alternative. Future extensions from East Kapolei to West Kapolei, Salt Lake Boulevard, and from Ala Moana Center to UH Manoa and to Waikiki are addressed in the Final EIS as cumulative effects in Sections 3 and 4.

Table 3-16 of the Draft EIS provides total transit boardings and linked trips in 2030 for each of the "First Project" Build Alternatives (East Kapolei to Ala Moana Center). Table 3-28 of the Draft EIS shows fixed guideway boardings for each of the "First Projects" and the "First Projects plus extensions" (East Kapolei to Ala Moana Center with the West Kapolei, UH Manoa, and Waikiki extensions). These tables have been revised in the Final EIS to show boardings for the Airport Alternative and the Airport Alternative plus future extensions (Tables 3-18 and 3-29 respectively).

As documented in the Alternatives Analysis and summarized in Chapter 2 of the Final EIS, the Managed Lane Alternative performed poorly in comparison to both the 20-mile and full-corridor Fixed Guideway Alternative alignments evaluated in the Alternatives Analysis. Chapter 2 in the Final EIS includes a discussion of why the Managed Lane Alternative is no longer being considered. Despite any prior comments, the Project in the EIS was defined to be the 20-mile fixed guideway that is the subject of the EIS by City Council action in adopting a financially constrained alternative. Because of available funding, the Project was, of necessity, limited in scope and, as a consequence, so was the content of the supporting EIS. Please note that the planned extensions are addressed generally in the Cumulative Impacts sections in Chapters 3 and 4 of the Final EIS. This Project has been consistent in its presentation to the public since the beginning of the EIS/Preliminary Engineering project began in mid 2007.

Part IV – Project Termini

The Record of Decision, acceptance of the Hawaii Revised Statutes Chapter 343 EIS, and applicable permits are required prior to construction. Pearl Highlands is not a project terminus, rather, it is a construction phasing point. The questions of logical termini, independent utility, and not restricting other foreseeable transportation improvements apply to project limits of East Kapolei and Ala Moana Center. First, the Project still connects logical termini and is of sufficient length to address environmental matters on a broad scope as required by 23 CFR

771.111(f). As discussed in Chapter 2 of the Final EIS, the open fields alluded to in the letter are slated for major residential and commercial development including a significant new campus of the University of Hawaii (University of Hawaii West Oahu) as well as the Kroc Center, a major destination community center complex. In addition, Ala Moana Center is a logical Koko Head terminus because it is a major activity center as well as a major transit hub with more than 2,000 weekday bus trips. The Project can operate independent of any future transportation improvements. Lastly, the 20-mile alignment will not preclude any reasonably foreseeable transportation improvements since it is proposed almost entirely within the median of existing roadways where no transportation improvements would occur. The Project enhances the existing transportation system by adding substantial new person-carrying capacity to the corridor by making more efficient use of the roadways. Construction phasing points such as Pearl Highlands are not relevant to the completion of the EIS as long as the entire Project is covered in the document.

Second, the Project has independent utility, because it will be usable and be a reasonable expenditure even if no additional transportation improvements in the area are made. As discussed in Chapter 2 of the Final EIS, the Project will connect multiple activity centers, provide cost-effective transit-user benefits, and meet the Purpose and Need whether or not the planned extensions are built.

Third, the Project will not restrict consideration of alternatives for other reasonably foreseeable transportation improvements. Construction of the Project will not preclude future development of the planned extensions, nor will it preclude development of other projects on the Oahu Regional Transportation Plan (ORTP).

Because of its length, the Project will be constructed in phases to accomplish the following:

- *Match the anticipated schedule for right-of-way acquisition and utility relocations.*
- *Reduce the time that each area will experience traffic and community disruptions.*
- *Allow for multiple construction contracts with smaller contract size to promote more competitive bidding.*
- *Match the rate of construction to what can be maintained with local workforce and available financial resources.*
- *Balance expenditure of funds to minimize borrowing.*

The construction phases are not project segments and are considered in total in the Final EIS to meet the requirements of 23 CFR 771.111(f).

Part V – Forecasts

1. Ridership forecasts

National trends show substantial ridership increases. Last year (2008) recorded the highest demand for public transportation in 52 years (APTA 2008 Ridership Report). National transit ridership has grown 18 percent over the past ten years (2007 National Transit Summaries

and Trends, National Transit Database). Honolulu transit ridership has grown over the past several years recovering from three fare increases (July 1, 2001, July 1, 2003, October 1, 2003) and a month-long strike (FY 2004). As identified in the Final EIS (Chapter 3, Section 3.2), transit ridership forecasts, for rail and bus service, are based on a travel demand forecasting model used by the Oahu Metropolitan Transportation Organization (OahuMPO) for the Oahu Regional Transportation Plan. This model is based on guidelines established by FTA and is required to qualify for federal grant funding under the New Starts program. FTA forecasting guidelines have been revised periodically to take advantage of experiences on other projects to ensure projections are realistic and reproducible. The ridership figures presented in the Final EIS have been developed using the latest and best practices put forth by the FTA.

In addition, the Project is one of the first in the country to design and undertake an uncertainty analysis of this type of travel forecast. The uncertainty analysis evaluates the variability of the forecast by establishing probabilistic upper and lower limits of ridership projections. FTA has worked closely with the City during this work effort. A variety of factors were considered in the uncertainty analysis, including the following:

- *Variations in assumptions regarding the magnitude and distribution patterns of future growth in the Ewa end of the corridor.*
- *The impact of various levels of investment in highway infrastructure.*
- *The expected frequency of service provided by the rapid transit system.*
- *Park-and-ride behavior with the new system in place.*
- *The implications on ridership of vehicle and passenger amenities provided by the new guideway vehicles.*

Given all the factors considered, the anticipated limits for guideway ridership in 2030 is expected to be between 105,000 to 130,000 trips per day, bracketing the official forecast of 116,000 riders a day used for all calculations.

2. Projected energy savings

According to the U.S. Department of Energy, Transportation Energy Data Book, for the year 2006, passenger cars require 3,512 BTUs per passenger mile while transit trains require 2,784 BTUs per passenger mile and transit buses require 4,235 BTUs per passenger mile. While New York City carries more transit trips than any other city, it represents only 22 percent of the rail passenger-miles traveled, not 57 percent, according to the Bureau of Transportation Statistics (BTS). Furthermore, the commenter applies the most convenient interpretation of the Department of Energy information to make his point about energy utilization. If we use 1600 BTU/mile instead of 8000 BTUs/mile, it can be argued, using the same statistics presented in the comment, that many transit riders use less than half the 3400 BTUs/mile consumed by people who drive. The analysis presented in both the Draft and Final EISs applies more reasonable numbers for energy use. As the Department of Energy advises, great care should be taken when comparing modal energy intensity data among modes. Because of the inherent differences among the transportation modes in the nature of services, routes available, and many additional factors, it is not possible to obtain truly comparable national energy intensities among modes. These values are averages, and there is a great deal of variability even within a

mode, as the commenter has demonstrated. The same Department of Energy report referenced by the commenter shows that between 1970 and 2006, highway transportation energy consumption has been growing at a rate of 1.8 percent per year. The commenter's assertion that highway transportation energy consumption will stop growing on an annual basis is not supported by data collected over the past 36 years.

With regard to construction energy usage, a construction project will obviously require the use of energy. If no construction is done, less energy will be used. Under any alternative evaluated to this point, with the exception of the ineffective No Build and TSM Alternatives in the Alternatives Analysis, avoiding construction is not possible and affords no possible way to meet the Project's Purpose and Need to improve mobility and reliability, access to planned growth areas, and improvement in the equity of the transportation system. Recognizing the demand for energy during construction, measures are being taken to reduce energy use during construction as noted in Chapter 4.18.6 of the Final EIS.

3. The Draft EIS financial plan

The financial plan for the Project is discussed in detail in Chapter 6 of the Final EIS. The commenter's statement that "the additional operating subsidy for rail is not accounted for in the cash flow" is incorrect. The referenced cash flow table anticipates a City subsidy of $4.726 billion will be spent to support all public transit operations and maintenance during the 2009-2030 period. This is approximately 14 percent of anticipated revenues from the City's General Fund and Highway Fund during this period of which the Project will represent less than 25 percent. Approximately 60 percent of General Fund and Highway Fund revenues come from property taxes with the remainder coming from a variety of other taxes and fees.

The commenter is correct in noting that over $500 million ($571 million) in General Obligation Bond proceeds are anticipated to be used for ongoing capital expenditures during the 2009-2030 period. This is a continuation of the City's long-standing practice of using General Obligation Bond proceeds to pay for ongoing capital expenditures for the transit system. As shown in the cash flow table for the Project, about 9 percent of ongoing capital expenditures during the 2009-2030 period are anticipated to be related to the rail line, with the remainder going to the purchase of vehicles and other capital projects for TheBus and TheHandi-Van. It is likely that many of these expenditures, utilizing General Obligation Bond proceeds, would occur even if the Project were not implemented. In reference to General Excise and Use Tax (GET) collections, the Final EIS financial analysis recognizes the reduction in GET surcharge collections, forecasting total revenues of $3,524 million from the GET surcharge, almost the same as presented in the commenter's letter.

The financial plan is a dynamic document that will be regularly updated to reflect changing conditions. The City will continue to refine revenue forecast and cost estimates as the Project proceeds through FTA's New Starts process. The financial analysis presented in Chapter 6 shows the overall Project financial plan to be balanced using federal and GET surcharge revenues. The primary change has been the amount of federal funding to be requested from New Starts has been increased. This revision has been presented to the FTA.

4. Risk Assessment

Chapter 6, Section 6.6 of the Final EIS provides a detailed discussion of the risks associated with Project funding ranging from project construction risks to market uncertainty to inflation. It also presents other possible revenue options should conditions warrant their consideration.

The operating cost model was developed using information from Washington Metro, Los Angeles and Miami as noted in Chapter 6 of the Final EIS. The procedure used was in accordance with the guidance of the FTA and has been reviewed by the FTA. All transit projects have a variety of different characteristics and thus do not provide an "apples to apples" comparison. While cost comparisons may be somewhat helpful in evaluating projects, they cannot form the primary basis for such an evaluation because of the unique physical conditions, engineering and other characteristics of each geographic area and system.

The "Pickrell Report" is widely accepted as being out of date as it reviewed a small sampling of systems that were built over 20 years ago and which were not exposed to the current more rigorous requirements of the FTA's New Starts process. The 2007 FTA report shows real costs to be much closer to estimates, in general. Sixty percent of the percentage discrepancy presented by the commenter is recognized in the report by the FTA to be attributable to one project, the Tren Urbano in Puerto Rico. Comparing the final estimate before construction of the same list of projects without the Tren Urbano shows the comparison of actual cost and estimate to be within a reasonable range. These kinds of discrepancies are now the subject of careful review by the FTA using third party financial specialists to supplement their own reviews. The New Starts process is designed to refine estimates as the engineering and design elements are advanced. In the end, the analyses in these reports serve to aid FTA in improving the way estimates are done.

Cost estimates and ridership projections for the Project have been developed in accordance with the latest guidance issued by FTA. FTA and the Project have the benefit of experience from other systems built in the U.S. FTA continuously adjusts the requirements to improve practices where necessary. As mentioned above, there are many checkpoints within the development of the Project subject to FTA scrutiny, review and, ultimately, approval. The Financial Plan and ridership analysis prepared for the Project and documented in the Final EIS contains the best available data, and their development adheres to FTA requirements. The Final EIS also discloses the potential risks and uncertainty associated with funding for the Project (Section 6.6).

The fixed guideway alternative was shown in the Alternatives Analysis Report to provide the best improvement in travel conditions over the No Build Alternative compared to the Managed Lane and the TSM alternatives. This analysis is discussed in Chapter 2 of the Final EIS. The fixed guideway will reduce VHD on the highways by 18 percent compared to the No Build Alternative. Other alternatives studied offer negligible improvement compared to the No Build Alternative.

The fixed guideway component of public transit operating costs is projected to be 25 percent of the systemwide total. Increasing operating costs are a consideration for the entire transit program. Operating costs for the transit system as a whole (i.e., TheBus and TheHandi-

Van and, eventually, the Project) are funded from the City's General and Highway Fund which is made up of a variety of sources, including property taxes, vehicle license fees and other items. The operating budget is set each year by the City Council during the budget process. The additional costs of the transit system will not by themselves cause a need to increase property taxes (and the contribution from the Project is even less likely to do so), but the City Council will review all competing needs and the available resources and make that decision each year as they do now with all City operating programs.

5. Operating subsidies

Chapter 6.4 of the Final EIS describes the basis for the operating costs used in the financial calculations. The primary public transit properties used for comparison were Washington D.C., Los Angeles, and Miami. These systems were selected because they had detailed information available as required by FTA. Other apparently comparable operations did not maintain the appropriate types of data needed for the detailed analysis required by FTA. The methodology to develop operating and maintenance cost estimates for the fixed guideway project was reviewed by the FTA. All properties used for comparison were steel-on-steel grade-separated systems. Your comment that Miami's operating cost per trip of $4.61 compared to Honolulu's projected $2.27 cost per trip suggests that Honolulu's operating cost may be understated. However, cost per trip is a poor metric for comparisons of operating costs because the measure also depends on ridership response to the service. Cost per vehicle revenue hour is a much better metric because vehicle-hours are a direct quantification of the amount of service provided. Miami's cost of $9.65/vehicle-hour is only slightly higher than Honolulu's projected cost of $9.20/vehicle hour.

Regarding the long term cumulative operations cost, the fixed guideway portion of the overall transit systemwide cost is less than 25 percent. Chapter 6.6 of the Final EIS discloses the risks and uncertainties associated with the financial analysis of the Project.

The cost of security is included in the operating costs estimated for the Project as part of the development of the overall operating costs for the system. Security costs are reflected in "professional services" element of the operating costs for all the systems used in developing Project. The security cost for the Los Angeles system cited in the comment is for all transit services not just fixed guideway service, which is significantly more extensive than Honolulu's proposed Project.

You also reference FTA's Contractor Performance Assessment Report (CPAR), September 2007. The findings of the CPAR with respect to operations and maintenance (O&M) costs are inconsistent with your assertion. Quoting from page 26 of the CPAR Appendix "Figure 8 shows that actual O&M costs tend to be less than the estimate prepared for the AA/DEIS – a finding consistent with the level of service offered." Quoting from page 27 "For the projects reported here the as-operated O&M costs are on average 92 percent of the estimate." Quoting from page 28 "It is rare for New Starts project O&M costs to exceed the planning estimates."

6. Replacement and Refurbishing

Information regarding replacement and refurbishing has been included in the Final EIS and is shown graphically in Figure 6-1. Similar replacement and refurbishing practices will apply

to the fixed guideway as they do to TheBus. Although railcar equipment is more costly, it has a much longer lifespan than buses and associated equipment and facilities. The funding for refurbishing and replacement will come primarily from discretionary and formula federal funding such as FTA Urbanized Area Program and the Fixed Guideway Modernization Program. The City will receive a higher share of formula funding because of the Project.

Replacement and refurbishment costs are minimal for the Project as a new system. Costs are expected to be very small with no full replacement needed until 16 years after the opening of the first segment (2028 at the earliest) and only minor repair costs about five or six years after opening. This places the demands for replacement and refurbishing outside the planning horizon for the Project. However, recognizing the need to provide for this cost over time, the Peskin approach has been used effectively for estimating these needs.

The need for refurbishing and replacement of capital assets is addressed in the Financial Plan and discussed in Chapter 6 of the Final EIS, including funds available for that purpose. There will be ongoing costs to maintain the fixed guideway system as there are with any capital investment over time. A possible method of calculation of such costs is mentioned above.

Forecasting and Cost Effectiveness

At a $16.24/hour cost-effectiveness index (CEI) as indicated in Chapter 7 of the Final EIS, the Project is well under the $23.99/hour level the FTA requires to find a project to be cost-effective. Ridership and costs are based on the best information available and have been developed consistent with FTA guidance and under FTA scrutiny. Even at lower levels of ridership or higher costs, the Project would still qualify under the FTA's CEI criterion.

FTA approved the Project's entry into Preliminary Engineering on October 16, 2009, giving the Project an overall rating of "Medium." This rating is sufficient for the Project to be advanced in the Federal project development process and for the Project to be recommended for Federal funding. The information related to the New Starts evaluation of the Project is discussed in Chapter 7, Section 7.6.

Part VI – Information in the Draft EIS

Numerous transportation reports were prepared for the Draft and Final EISs, including the Transportation Technical Report; Addendum 01 Addendum 02, and Addendum 03 to the Transportation Technical Report; Model Development, Calibration, and Validation Report; Travel Forecasting Results and Uncertainties Report; Travel Demand Forecasting Results Report; and Addendum 01 to the Travel Demand Forecasting Results Report. These reports are available on the Project website and listed in the References section of the Final EIS.

1. Other material

a) OMPO surveys:

The statements quoted from the 2004 Oahu MPO Survey indicate that there is broad public support for an improved transit system and a willingness to fund the improvements with local tax revenue.

The 2006 survey provided little new information about the public's opinion about the fixed-guideway project. The indication that one-third of Oahu residents plan to use the Project on a regular basis would indicate a substantial desire of current drivers to change mode to reliable transit.

b) Future traffic conditions versus today's traffic:

The Draft EIS provided existing traffic conditions in Table 3-7 and 2030 conditions with and without the Project in Table 3-20. The information is provided for the public to compare current conditions to those projected for the future both with and without the Project. Tables 3-9 and 3-10 in the Final EIS present traffic volume information for existing conditions and for 2030, with and without the Project, during the a.m. and p.m. peak hours. These tables have been revised in the Final EIS to show the component roadway facilities of each screenline, level-of-service, and maximum volume thresholds. As shown in these tables, traffic decreases with the introduction of the Project. The Final EIS includes a statement in the Summary of Findings (now appearing as Table 3-1) stating that roadway conditions in 2030 will be better with the Project than the No Build Alternative. Table 3-14 compares the 2030 No Build Alternative with the Project and clearly shows the benefits of building rail to vehicle miles traveled (VMT), vehicle hours traveled (VHT) and VHD. All measures decrease significantly with the implementation of the fixed guideway compared to the No Build Alternative.

c) Highway capacity data

In response to comments and additional analysis, the travel forecasting model has been refined since the Draft EIS to account for non home based direct demand trips during off peak periods. In addition, the air passenger model was updated to reflect current conditions. The Final EIS reflects updated ridership numbers resulting from model refinement. Screenline information for existing conditions, 2030 No Build, and the Project are shown in Tables 3-9 and 3-10. Updated VMT, VHT, and VHD for all time frames are shown in Table 3-14.

Under the No Build and Build alternatives, travel forecasting has assumed several transportation projects, including congestion relief projects in the Oahu Regional Transportation Plan 2030 (as shown in Table 2-4 in the Final EIS). As identified in Chapter 3 of the Final EIS (Table 3-14), the fixed guideway alternatives will result in reduced islandwide vehicle delay of 18 percent as compared to the No Build Alternative.

The screenline volumes in the Alternatives Analysis report were incorrect and have since been corrected. Numbers have been updated for the Final EIS based on the Airport Alternative and refinements to the travel demand forecasting model. The updated results continue to show that traffic will decrease with the addition of the Project. Tables 3-9 and 3-10 in the Final EIS contain updated screenline information including level-of-service, maximum capacity thresholds, and the component roadway facilities of each screenline.

2. *Purpose and Need statement:*

Section 1.7 of the Draft EIS specifically states the Project's purpose: The purpose of the Honolulu High-Capacity Transit Corridor Project is to provide high-capacity rapid transit in the

highly congested east-west transportation corridor between Kapolei and UH Manoa, as specified in the Oahu Regional Transportation Plan 2030 *(OahuMPO 2006). This Purpose and Need in the Draft EIS reflects the work completed during the Alternatives Analysis and the findings resulting from that effort that led to a City Council decision to pursue a fixed guideway system for Honolulu. The Project is intended to provide faster, more reliable public transportation service in the study corridor than can be achieved with buses operating in congested mixed-flow traffic, to provide reliable mobility in areas of the study corridor where people of limited income and an aging population live, and to serve rapidly developing areas of the study corridor. The Project also will provide an alternative to private automobile travel and improve transit links within the study corridor. Implementation of the Project, in conjunction with other improvements included in the ORTP, will moderate anticipated traffic congestion in the study corridor. The Honolulu High-Capacity Transit Corridor Project also supports the goals of the Honolulu General Plan and the ORTP by serving areas designated for urban growth.*

The need for transit improvements are discussed in Section 1.8 of the Draft EIS, and are addressed by the Project goals as discussed in Section 1.9 of the Draft EIS. They include: improve corridor mobility, improve corridor travel reliability, improve access to planned development to support City policy to develop a second urban center, and to improve transportation equity.

The purpose and need statement complies with the requirements of NEPA and applicable FTA guidance.

3. Visual renderings

Please see our response to this topic above, under Part II.

Part VII – Information outside of the Draft EIS

The Draft and Final EISs include a clear and objective evaluation of project alternatives and impacts.

Project funds have been expended to inform the public and solicit public input about the status and details of the Project.

The comment related to political contributions is not related to the environmental analysis of the Project.

The purpose of the Project, as stated in Section 1.7 of the Final EIS, includes moderation of anticipated traffic congestion ("Implementation of the project, in conjunction with other improvements included in the ORTP, will moderate anticipated traffic congestion in the study corridor."). As shown in Table 3-14 in the Final EIS, in comparison to the No Build Alternative, in 2030 the Project will result in an 18 percent reduction in islandwide congestion, as measured by daily vehicle hours of delay. Thus, the Project meets the purpose of moderating anticipated traffic congestion.

You are correct in pointing out that traffic congestion will be worse in the future with rail than what it is today without rail, and that is supported by the data included in the Final EIS. In

fact, projections suggest that traffic conditions will be worse in 2030 under any circumstances. The Alternative Analysis supports this statement as does the analysis of transportation impacts in the Final EIS. The comparison that is key to the Project is that rail will improve conditions compared to what they would be if the Project is not built. With the fixed guideway system, total islandwide congestion (as measured by VHD) will decrease by 18 percent (as shown in Table 3-14 in the Final EIS), compared to the No Build Alternative. In addition, traffic volumes were studied at various screenlines in the study corridor. The travel demand forecasting model was used to forecast traffic volumes at these screenlines in 2030, both with and without the Project (as shown in Tables 3-9 and 3-10 in the Final EIS). Analysis revealed that traffic volumes at these screenlines will decrease up to 11 percent with the Project. Accordingly, traffic conditions will be significantly better with the fixed guideway compared to the No Build Alternative.

The comment regarding inaccuracy in statements made by politicians is not related to the NEPA environmental analysis of the Project. FTA is the federal lead agency and will continue to ensure compliance with NEPA as part of their responsibilities under NEPA and federal law.

The NEPA process is unrelated to any electoral processes. Further, this comment regarding the electoral process is not related to the environmental analysis of the Project.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
Creation Date :	2/6/2009
Creator Affiliation :	
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Submission Method :	Website
Other Submission Method :	
Submission Date :	02/06/2009
Submission Content/Notes :	We are concerned about the impact construction will have on our Kapalama Branch located at 1535 Dillingham Blvd. 1. How will the construction impact traffic along Dillingham Blvd.? Will construction be phased to close one lane at a time thus creating traffic bottle necks? 2. During construction, we are concerned egress into our facility will be compromised. 3. We are concerned about the construction noise, dust and heavy equipment vibrations during business hours. We understand the street will be a construction site, however we need to conduct business in a business like fashion and not have to raise our voices to be heard by our customers. 4. Will there be road closures during normal business hours? 5. Is night work a consideration? 6. Will portions of the property need to be condemned or encroached upon to allow the rail structure? 7. How will the project phasing be communicated to affected businesses? Will we receive prior notification of critical work that will impact our foot and vehicular traffic? 8.After completion of the project will visibility to our facility be compromised?We rely on street visibility of signage and placements of vertical support structures may block visibility.

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
MAYOR

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DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-334789

Ms. Theresa Hookano
220 South King Street, #550
Honolulu, Hawaii 96813

Dear Ms. Hookano:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following addresses your comments regarding the above-referenced submittal:

This letter will address your comments in the same manner as your letter.

1. *The exact impact of construction activity on traffic is not yet known. As discussed in Section 3.5.7 of the Final EIS, a Maintenance of Traffic (MOT) Plan will be developed in advance by the contractor with approval from the City Department of Transportation Services and Hawaii Department of Transportation. The MOT Plan will identify measures to mitigate temporary construction-related effects on transportation and will address roadway closures for streets identified in Table 3-27 of the Final EIS. As stated in Section 4.18.1 of the Final EIS, several public involvement strategies will be used to inform businesses and the public about construction activities, including roadway detours. These include a public involvement*

plan developed prior to construction to inform business owners of the construction schedule and activities, as well as public information campaigns to reassure people that businesses are open during construction and to encourage their continued patronage. Public information regarding construction activities will be provided in print and on television and radio. The Project will provide advance notice if utilities are to be disrupted and will schedule major utility shut-offs during non-business hours.

2. *As stated in Section 4.18.1 of the Final EIS, access to businesses near construction activities could temporarily be affected. Drivers may be required to change their approach in order to enter businesses. The MOT Plan will address temporary effects on access to businesses during construction. Mitigation measures will include maintaining access to businesses during construction and providing business owners prior notification regarding construction activities and schedule.*

3. *As discussed in Section 4.18.5 of the Final EIS, prior to construction, the contractor will be required to obtain an approved Community Noise Variance from the Hawaii Department of Health. The permit will regulate construction times and activities and include mitigation commitments. Mitigation measures will include monitoring plans, temporary noise barriers or curtains, and placement of construction machinery. Noise impacts from construction will not be constant, and business disruptions will be kept to a minimum. The contractor will be required to provide mitigation for pile driving activities that are closer than 75 feet to buildings. As discussed in Section 4.18.4 of the Final EIS, dust will be controlled by using watering trucks, covering truckloads of dirt, using windbreaks, washing and cleaning construction equipment, and minimizing construction-related traffic on and off work sights.*

4. *As shown in Table 3-27 of the Final EIS, temporary peak-period lane closures will be necessary along that section of Dillingham Boulevard. An MOT Plan will address the duration of lane closures and provide mitigation strategies. As discussed previously, several public involvement strategies will be used to inform businesses and the public about construction activities, including roadway detours.*

5. *Yes, nighttime work is a possibility.*

6. *Dillingham Boulevard in this vicinity will require widening to the makai side of the roadway. Additional right-of-way will be required to relocate the sidewalk farther makai and allow for widening. Owners of properties where an acquisition is required have all been individually contacted to discuss right-of-way impacts to their property. As design progresses, there will be a refinement of property requirements. Specific right-of-way needs are shown in Appendix C of the Final EIS.*

7. *As discussed previously, Section 4.18.1 of the Final EIS discuss the effects that construction will have on businesses. Communication and coordination with businesses will occur throughout the process. Access to businesses near construction activities could be temporarily affected. DTS will coordinate with affected businesses prior to construction. A public involvement plan will be developed prior to each construction phase, which will detail outreach tailored to the construction phase. DTS will maintain the project website (www.honolulutransit.org), which will also provide information to the community regarding construction phasing.*

8. *Building the Project will have short-term effects on the environment, including the business community, as discussed in Section 4.18.1 of the Final EIS. During that period of time, every effort will be made to inform the surrounding affected community about upcoming and ongoing construction activities. Access may temporarily change during this phase, but there will be access to your place of business during construction. The guideway will be about 30 feet above the center of Dillingham Boulevard as it passes by the Kapalama Branch and McNeill Street. The visibility for motorists along Dillingham Boulevard is illustrated on Figure 4-29 (Viewpoint 10) of the Final EIS. The simulated view shows that the guideway columns would not block views of businesses or signage as the guideway will be constructed overhead and the columns will be constructed in the median and spaced at substantial intervals of between 120 and 1,550 feet. In addition, the signage for the bank will be visible under the guideway to travelers on Dillingham Boulevard.*

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
Creation Date :	12/11/2008
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Telephone :	341-3136
Telephone Extension :	
Add to Mailing List :	Standard
Submission Method :	Website
Other Submission Method :	
Submission Date :	12/11/2008
Submission Content/Notes :	Having been loosely associated with rail transit matters since the time of the initial Fasi proposal, I am a strong supporter. Major cities simply cannot function well over the long term without some version of off-grade rail transit. However, I also believe the present proposal should be modified in several ways. First, in light of the immense cost involved, it should be made clear that no ground will be broken until there is iron-clad assurance that all possible Federal support (including new prospects presently under discussion) will be available. Second, construction of the system should follow the classic pattern and be built from the city core outward rather than as currently planned. There are several reasons this makes good sense. Particularly if some future event--economic or other--were to cause a halt in the project, it would be far preferable to have a segment serving the urban core instead of one starting in Ewa and stopping in Waipahu or Pearl City. The project definitely should be moved ahead but not so rapidly that overly hasty decisions are made.

DEPARTMENT OF TRANSPORTATION SERVICES

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-331797

Mr. Paul Hooper
700 Richards Street
Apartment 2406
Honolulu, Hawaii 96813

Dear Mr. Hooper:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall indentify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

The current plan is to begin construction as soon as possible, using local funds, prior to the execution of a Full Funding Grant Agreement with the FTA in order to ameliorate the effects of cost escalation that would occur if the project start is delayed. The environmental process must be completed before Federal funding can be committed to construct a project. No contracts for construction will start before the Record of Decision for the Environmental Impact Statement is issued by FTA. Once that occurs, although action by Congress is still required, there is an expectation of approval of a Full Funding Grant Agreement based on the experience with other projects throughout the country.

As described in Section 2.5.10, Project Phasing, and further in Section 8.6.9, Construction Phasing, in the Final EIS, to support phased opening, the first construction phase

must be connected to a maintenance and storage facility, which requires considerable space. No location has been identified closer to Downtown with sufficient available space to construct a maintenance and storage facility. Therefore, construction will begin between East Kapolei and Leeward Community College. The Project will be constructed in phases to accomplish the following:

- Match the anticipated schedule for right-of-way acquisition and utility relocations.
- Reduce the time that each area will experience traffic and community disturbances.
- Allow for multiple construction contracts with smaller contract size to promote more competitive bidding.
- Match the rate of construction to what can be maintained with local workforce and available financial resources.
- Balance expenditure of funds to minimize borrowing.

The portion of the corridor in the Ewa direction of Pearl Highlands is less developed than the areas in the Koko Head direction. Right-of-way can be obtained more quickly at the west end of the Project; therefore, overall project construction can begin earlier, resulting in lower total construction costs. Construction is planned to continue uninterrupted in the Koko Head direction from Pearl Highlands to Aloha Stadium, Kalihi, and finally to Ala Moana Center.

As portions of the Project are completed, each will be opened incrementally so that system benefits, even if limited during the initial phases, will be realized prior to completion of construction of the entire Project.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
Creation Date :	11/21/2008
Creator Affiliation :	
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Telephone Extension :	
Add to Mailing List :	None
Submission Method :	Website
Other Submission Method :	
Submission Date :	11/21/2008
Submission Content/Notes :	Rail and What Is The Cost from Year 1 to 10. First, we the public need to see a published, in the local week-end newspapers, counting of the votes for and against RAIL. The pure number count of voters who were FOR and those AGAINST. Second, the public needs to see, published in the local week-end newspapers, the complete costs of the STEEL ON STEEL rail system, from year 1 through year 10. All involved costs AND all projected sources and amount of funds projected to be received to fund the costs. Third, the current route, which does not include the AIRPORT, seems to be politically motivated, therefore an ECONOMIC ANALYSIS must be provided to the public, in the local week-end newspapers, showing the advantages and disadvantages of all possible routes, including AIRPORT & SALT LAKE . Fourth, what is the future plan to provide similar service to all parts of Oahu. If there is no plan, WHY ISN'T THERE A PLAN, are we not as important as citizens on the current proposed route? Fifth, who are the BUSINESS proponents fort the current RAIL system, what amount of have they contributed to any Hawaii Legistive members campaigns or operating expenses, AND what plans do those businesses have for improvements in areas currently committed to being train stations/stops/loading-unloading?

DEPARTMENT OF TRANSPORTATION SERVICES

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-330584

Mr. Harry Huyler
147 Oko Street
Apartment 3
Kailua, Hawaii 96734

Dear Mr. Huyler:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

Per your first comment, The Honolulu Advertiser published an article on November 10, 2008, which evaluated the voting patterns in the results for the Project.

Regarding your second comment as to the cost of the Project, as noted in Section 6.5 of the Final EIS, the Honolulu High-Capacity Transit Corridor Project Summary Cash Flow Tables (RTD 2009g) present the year-by-year cash flow tables for the Project. They are available as support documents to the Final EIS along with other technical reports.

To answer your third comment, both the Airport and Salt Lake Alternatives were carried forward in the Draft EIS. No alignment had been selected at that time. The City has since identified the Airport Alternative as the Project. While each of the alternatives discussed in the Draft EIS includes trade-offs between benefits and impacts, the Airport Alternative from East Kapolei to Ala Moana has been selected as the Preferred Alternative as described above. As

compared to the alternatives discussed in the Draft EIS, the Airport Alternative will carry the most passengers, provide the greatest transit-user benefits, and result in the fewest vehicle hours of delay. It will provide access to employment centers at Pearl Harbor Naval Base and Honolulu International Airport and will serve the Salt Lake neighborhood with connecting bus service. Of the three Build Alternatives addressed in the Draft EIS, the Airport Alternative will have slightly less impacts to the natural and built environment analyzed in the Draft EIS. During the public comment period on the Draft EIS, the public overwhelmingly supported the Airport Alternative. Of the comments that specifically supported one of the alternatives, more than 75 percent were in support of the Airport Alternative. For more information this selection is discussed in Section 2.4 of the Final EIS. Since publication of the Draft EIS, design has been advanced, further analysis has been completed, and information has been added in response to comments on the Draft EIS and agency coordination. The Final EIS discusses the process that was used to select the Preferred Alternative, how comments were considered in the decision-making process, impacts and mitigation commitments.

The Project has logical termini at East Kapolei and Ala Moana Center and independent utility from any extensions that may be constructed in the future. The proposed future extensions to West Kapolei, Salt Lake Boulevard, Waikiki, and UH Manoa are discussed in the cumulative impacts sections of Chapters 3 and 4 of this Final EIS. However, future extensions are not part of this Project, thus they are not required to be evaluated under Chapter 343 of the Hawaii Revised Statutes and the National Environmental Policy Act (NEPA). Under NEPA, environmental analysis is only required when there is a proposed action by a Federal agency. Here, because the future extensions are not proposed for implementation at this time, they are not part of the Project studied in this Final EIS. It would be premature to undertake an environmental analysis of the extensions (beyond the cumulative impacts analysis) because they are not part of the proposed action to be taken by the City and FTA. If the future extensions are proposed for implementation in the future, environmental analysis of the extensions and appropriate alternatives will be undertaken at that time.

Lastly, business proponents consist of the Hawaii Business Roundtable and several other business groups that have voiced support for the Project. Information on campaign contributions may be obtained from the State of Hawaii Campaign Spending Commission. Questions regarding plans for future development by private groups should be directed to the groups in question. Aside from the secondary and cumulative effects described in the Final EIS, such development is not part of the Project proposed in this EIS.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

letter. Issuance of the Record of Decision under NEPA and acceptance of the Final EIS by the Governor of the State of Hawaii are the next anticipated actions and will conclude the environmental review process for this Project.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
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Submission Method :	Website
Other Submission Method :	
Submission Date :	12/27/2008
Submission Content/Notes :	Aloha to whom ever this may concern, I really think that this transit system isnt great for Hawaii, espescially at times like this. Last night was one of Hawaii's biggest black out since the earth quake and we wouldnt have problems if we had back power plants to the ones we already have. if one goes down we have another. Look we have comments in the advertiser from people in Okinawa and they have yet to have a blackout like the one in Oahu. That tells you something, use our tax paying money to something we need not to something we want. Im one of the people that voted for the transit not to be build, but seriously if the goverment gets there heads out of their asses an really look over everything they could see what exactly were going through. thanks for your time for reading my response.

DEPARTMENT OF TRANSPORTATION SERVICES

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-332261

Ms. Sheree-Victoria Iaea
2625 Namauu Drive
Honolulu, Hawaii 96817

Dear Ms. Iaea:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraph addresses your comments regarding the above-referenced submittal:

Since trains and rail stations will be electrically powered, the system's infrastructure is being designed to handle service disruptions. For example, trains will draw power from many points along the route, so an outage in a few areas should not disrupt service. If electrical power is lost systemwide, then train brakes are designed to stop the rail cars even without power. Lights will stay on in trains and stations; backup batteries will provide lighting for several hours. The train operations center will communicate with passengers via the public address system and intercom and provide guidance. If power is restored within a short time, service will resume. With a prolonged outage, the operations center will direct passengers to exit the trains and walk along a lighted emergency walkway on the guideway to the nearest station. For those unable to exit rail cars, help will be provided by emergency responders and transit staff. Passengers will be met at the train station by a coordinated response from emergency responders and City transportation workers.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
Creation Date :	11/3/2008
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Telephone :	
Telephone Extension :	
Add to Mailing List :	Email
Submission Method :	Website
Other Submission Method :	
Submission Date :	11/03/2008

Submission Content/Notes : A couple of questions...your Q&A section estimates 25,000 cars off the road each day due to rail. But the reason the highways are crowded is because everyone has to be in the same area around the same time. So if you can carry 300 people, or 6000 per hour (again from your Q&A section) what about the rest of the people who need to be at work at the same time as those other 6000 people? Don't they still have to drive? so how can you estimate 25,000 cars off the road if only 4000 cars are off the road during the time people need to be travelling to work?

Second question...is it legal to have people vote on a rail system if the eis is provided only a few days before the ballot? If not, then the legal challenge will end up costing more and the vote will need to happen again.

Third (and final for now) question...will the ballot issue be on neighbor island ballots? While the GET increase may have been on Oahu, if you assume that it does not flow to other counties, that is somewhat short-sighted (I hope that is not the extent of the reasoning abilities applied to the rail project). Is the tax increase charged to businesses on the other islands that purchase goods from Oahu? If so then it would seem to be a constitutional issue that could be challenged and again delay the project and or the vote.

(for the record I support the effort to have a rail system although I feel the current model is not feasible. I wonder if anyone in office would like to wager or bet their reputation on whether or not it will actually help by the time it is built?)

thanks...ken

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, 3RD FLOOR
HONOLULU, HAWAII 96813
Phone: (808) 768-8305 • Fax: (808) 768-4730 • Internet: www.honolulu.gov

MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT8/09-330347

Mr. Ken Ikeda
ken.m.ikeda@gmail.com

Dear Mr. Ikeda:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

Chapter 3 of the Draft EIS showed that peak direction volume during the morning (a.m.) two-hour peak period will be below the fixed guideway system's currently planned minimum capacity. Should higher volumes be realized, the system is expandable to accommodate longer trains and to reduce the headways between trains from 3 minutes to 90 seconds resulting in an increase in capacity of more than 100 percent.

Ridership projections for the forecast year of 2030 have been developed using the travel demand model, which was calibrated against collected traffic and transit ridership information and then validated against recent counts to be sure it properly represents travel activity in the transportation system (Section 3.2.1 of the Final EIS). An on-board transit survey was completed in December 2005 and January 2006, and the latest socioeconomic information available as of October 2008 was incorporated. Traffic counts were collected in 2005, 2007, and 2008. The model is based upon a set of realistic input assumptions regarding land use and demographic changes between now and 2030 and expected transportation levels of service on both the highway and public transit system. Since

the Draft EIS was published, the travel demand model has been refined by adding an updated air passenger model (which forecasts travel in the corridor related to passengers arriving or departing at Honolulu International Airport), defining more realistic drive access modes (driving alone or car pooling) to project stations and recognizing a more robust off-peak non-home-based direct demand element (trips that do not originate at home) based on travel surveys in Honolulu. Based upon the model and these key input assumptions, approximately 116,000 trips per day are expected to use rapid transit system on an average weekday in 2030. Chapter 3, Section 3.4.2 of the Final EIS states that the maximum peak direction volume during the a.m. two-hour peak period will be about 14,700 passengers. The operating plan for the fixed guideway system has been revised and the system will have a minimum capacity exceeding 17,300 passengers per direction during the two-hour peak period. The Final EIS reflects the updated modeling results. Table 3-18 in the Final EIS shows that the fixed guideway system will have more than 116,000 daily boardings. Approximately 40,000 automobiles will be removed from roadways daily as a result of the Project, compared to the No Build conditions. Based on the results from the travel demand forecasting model, most riders will travel during the peak periods. The Project will not accommodate all commuters that will continue to drive on the highways, which will continue to carry high traffic volumes. The Project, however, does, offer commuters a choice that will have a relatively high speed regardless of conditions on the highways.

As discussed above, the planned capacity of the system is greater than the passenger volume predicted by the travel demand forecasting model. Further, the travel demand model forecasts that more than 51,000 fewer vehicle trips will occur daily with the Project (as shown in Table 3-12 in the Final EIS).

In regards to your second question, the NEPA process is unrelated to any local electoral process. The ballot initiative was independent of the Draft EIS which is part of the NEPA process.

Per your last question, the transit ballot measure was specific to Oahu. Per the State of Hawai'i Department of Taxation Oahu County Surcharge Frequently Asked Questions (FAQs) (http://www.state.hi.us/tax/a2_b2_7csurchg_faq.htm) updated January 23, 2009:

- *All businesses on Oahu are required to pay the 0.5 percent County surcharge tax on all Oahu transactions in addition to the 4 percent General Excise and Use Tax (GET) surcharge.*
- *Neighbor island businesses (and out-of-state businesses) that do not deliver any goods or services to Oahu are not subject to the new 0.5 percent County surcharge tax.*
- *Neighbor island businesses (and out-of-state businesses) that deliver goods or services to Oahu, and have a "physical presence" on Oahu, must pay the new 0.5 percent County surcharge tax on their Oahu transactions. ("Physical presence" means, for example, having an office on Oahu, an employee or agent on Oahu, or sales representatives traveling to Oahu to do business.)*
- *In general, any income earned from any transaction related to an Oahu customer is subject to the 0.5 percent County surcharge tax.*

Business activities that are subject to the 4 percent GET surcharge rate, such as retailing of goods and services, contracting, renting real property or tangible personal property, and interest income, are also subject to the 0.5 percent County surcharge.

The FTA and DTS appreciate your interest in the Project. The Final EIS has been issued in conjunction with the distribution of this letter. You may view the Final EIS on the Project website at www.honolulutransit.org. You may request a DVD of the Final EIS and additional content through the "Contact Us" tab on the website or by calling the Project hotline at 566-2299. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Status :	Initial Action Needed
Creation Date :	12/5/2008
Creator Affiliation :	
First Name :	Sean
Last Name :	Ishii
Business/Organization :	
Address :	930 Kaheka St
Alternative Preference :	
Apt./Suite No. :	3202
City :	Honolulu
State :	HI
Zip Code :	96814
Email :	sean_ishii99@yahoo.com
Telephone :	
Telephone Extension :	
Add to Mailing List :	Both
Submission Method :	Website
Other Submission Method :	
Submission Date :	12/05/2008
Submission Content/Notes :	I believe that rail would work best, that is get the most usage, by going near the airport not through Salt Lake. I also believe the ridership on the first segment would be higher if the rail is built nearer to town. It makes no sense to build it out west first. Lack of use with that train that "goes nowhere" could cause large financial issues and would increase taxpayer burden.

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-331291

Mr. Sean Ishii
930 Kaheka Street, Apt. 3202
Honolulu, Hawaii 96814

Dear Mr. Ishii:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall indentify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

Your preference for the Airport Alternative has been noted. While each of the alternatives discussed in the Draft EIS includes trade-offs between benefits and impacts, the Airport Alternative from East Kapolei to Ala Moana has been identified as the Preferred Alternative as described above. Compared to the other alternatives discussed in the Draft EIS, the Airport Alternative will carry the most passengers, provide the greatest transit-user benefits, and result in the fewest vehicle hours of delay. It will provide access to employment centers at Pearl Harbor Naval Base and Honolulu International Airport and will serve the Salt Lake neighborhood with connecting bus service. Of the three Build Alternatives addressed in the Draft EIS, the Airport Alternative will have slightly lower impacts to the natural and built environment. During the public comment period on the Draft EIS, the public overwhelmingly supported the Airport Alternative. Of the comments that specifically supported one of the alternatives, more than 75 percent were in support of the Airport Alternative.

As described in Section 2.5.10 of the Final EIS, to support phased opening of the system, the first construction phase must be connected to a maintenance and storage facility, which requires considerable land. The first phase of the Project must be connected to the maintenance and storage facility because, in addition to maintenance of equipment and ongoing operations, the maintenance and storage facility houses the main control center for the entire Project and the required testing and operation of the system could not be completed without access to it. No location has been identified closer to Downtown with sufficient available land to construct a maintenance and storage facility. The Project will be constructed in phases to accomplish the following:

- *Match the anticipated schedule for right-of-way acquisition and utility relocations*
- *Reduce the time that each area will experience traffic and community disturbances*
- *Allow for multiple construction contracts with smaller contract size to promote more competitive bidding*
- *Match the rate of construction to what can be maintained with local workforce and resources*
- *Balance expenditure of funds to minimize borrowing*

The portion of the corridor Ewa of Pearl Highlands is less developed than the areas Koko Head. Right-of-way can be obtained more quickly; therefore, overall project construction can begin earlier, resulting in lower total construction costs. Construction is planned to continue uninterrupted Koko Head from Pearl Highlands to Aloha Stadium, then Kalihi, and finally to Ala Moana Center.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
Creation Date :	1/18/2009
Creator Affiliation :	
First Name :	Bill
Last Name :	James
Business/Organization :	JPods LLC
Address :	5255 Stevens Creek Blvd
Alternative Preference :	
Apt./Suite No. :	137
City :	Santa Clara
State :	CA
Zip Code :	95051
Email :	bill.james@jpods.com
Telephone :	612.414.4211
Telephone Extension :	
Add to Mailing List :	Email
Submission Method :	Website
Other Submission Method :	
Submission Date :	01/18/2009

Submission Content/Notes : According to DOE:
Trains use 2,996 BTU's per passenger-mile.
Cars use 3,512 BTU's per passenger-mile.

Cars and trains are nearly equally wasteful and harmful to the climate.

Personal Rapid Transit (PRT) sets an efficient paradigm shift. Read Congressional Office of Technology Assessment study PB-244854 for background. There are numerous additional studies.

Morgantown's PRT network has delivered 110 million injury-free, oil-free passenger miles.

Our version of PRT, JPods use 433 BTU's per passenger-mile, efficient enough that solar collectors 6-foot wide mounted over the rails gather 5,000 to 12,000 vehicle-miles of power per mile of rail per typical day.

We can build a demonstration unit in Hawaii within 5 months if you will grant rights of way. We will build this unit with private capital.

In 6 years we can displace 70% of oil-based transportation in Honolulu. Here is link to our response to San Jose's request to build such networks:
http://www.jpods.com/JPods/007Cities/SanJose/SanJoseJPodsProposal2008All.pdf

DEPARTMENT OF TRANSPORTATION SERVICES

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-334002

Mr. Bill James
5255 Stevens Creek Boulevard, #137
Santa Clara, California 95051

Dear Mr. James:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraph addresses your comments regarding the above-referenced submittal:

Your comments have been noted. As described in Section 2.2.1 of the Final EIS, Personal Rapid Transit Technology was evaluated and determined to have insufficient capacity and unproven reliability for a 20-mile or greater system. In addition, DTS does not control right-of-way beyond that which is required to construct the transit project.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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HONOLULU, HAWAII 96813
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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

RICHARD F. TORRES
DEPUTY DIRECTOR

RECEIVED
08 NOV 17 P 2:37
DIRECTOR'S OFFICE
DEPT. OF
TRANSPORTATION SERVICES

November 12, 2008

Dear Participant:

Subject: Honolulu High-Capacity Transit Corridor Project
Draft Environmental Impact Statement/Section 4(f) Evaluation

Attached for your review and comment is a Draft Environmental Impact Statement (EIS)/Section 4(f) Evaluation prepared pursuant to the National Environmental Policy Act, Section 4(f) of the U.S. Department of Transportation Act of 1966, State of Hawaii EIS Law (Hawaii Revised Statutes, Chapter 343) and the State of Hawaii EIS rules (Hawaii Administrative Rules, Title 11, Chapter 200).

TITLE OF PROJECT: Honolulu High-Capacity Transit Corridor Project

LOCATION: Island of O'ahu, Honolulu and 'Ewa Districts

TAX MAP KEY NUMBERS: 1-1-2,3,4,6,7,10,35,64,71; 1-2-3,9,13,17,18,26; 1-5-7,15,20,21,28; 2-1-14,27,30,31,50,52; 2-3-2,4,7,38,39; 9-1-16,17,18; 9-4-8,11,17,19,47,48; 9-6-3,4; 9-7-22,23,24; 9-8-9,14,15; 9-9-1,2,3,48,71,76: various parcels

AGENCY ACTION: __X__ APPLICANT ACTION: _____

Your comments must be received or postmarked by January 7, 2009.

Please send original comments to:

Mr. Wayne Y. Yoshioka, Director
Department of Transportation Services
City and County of Honolulu
650 South King Street, 3rd Floor
Honolulu, Hawaii 96813
(808) 768-8303

Mark R James
Return address:
2911 Pac. Hts Rd
Honolulu HI 96813

Please send copies of comments to OEQC and to:

Mr. Ted Matley
FTA Region IX
201 Mission Street, Suite 1650
San Francisco, California 94105
(415) 744-3133

Thank you for your assistance in this important project.

11/19/08

Dear Mr. Yoshioka,

I Agree 100% w/ the Article from Mr. Rick Hamada, Midweek Mag. 11-19-08. We need A equitable Assessment of the details D E I S from Fed. Govt.

THANK YOU.

CC: Mr. Ted Matley

Mark R James

AR00002132

A CONSERVATIVE ESTIMATE *Rick Hamada*

More of Mufi's Rail Deceptions

Well, Romy, welcome to the club.

Mayor Mufi Hannemann shook the hands of Cachola and Salt Lake representatives in promising the rail route would run along Salt Lake Boulevard. He needed Cachola's vote, and the rail re-route from the airport to his district raised allegations of political gladhanding. It clearly was a political maneuver that became the calling card of the entire project.

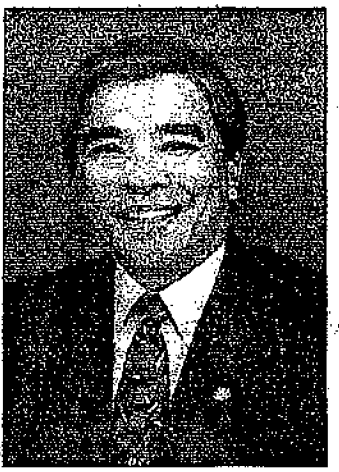
Just as the decision to award the route to Salt Lake was a little smelly, the ballots weren't even dry when the mayor, and a select group of councilmembers, flipped Romy and Salt Lake the bird and re-re-routed the rail back to the airport.

I mean, really, is anybody surprised?

Romy made a backdoor deal and got hit in the okole when it was slammed shut by the mayor. As they say, if you are going to play in the mud, you're going to get dirty. Cachola put the mayor on the line with threats of pulling his vote, and Mufi let Cachola think that he would honor his agreement.

Councilman Cachola is just one in a long line of those who feel betrayed by the rail process. First and foremost, the whole propagandistic indoctrination of the people with ad nauseum pro-rail commercials ranks as one of the most blatant and outrageous voter-manipulation episodes ever seen in Hawaii. The combination of taxpayer money and special interest money was a staggering amount.

There was a paucity of fair-



City Councilman Romy Cachola is upset that he was deceived about the rail project.

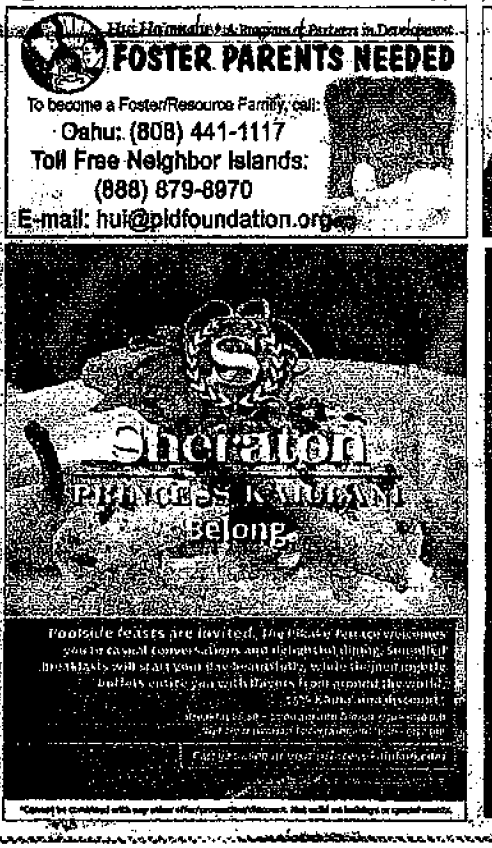
ness and equality. Save the federal involvement, I am not confident that the discussion of the DEIS will be above reproach.

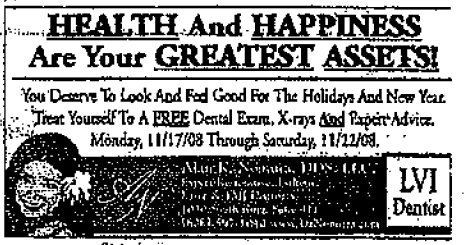
All the reasons for opposing this project exist. The route, the cost, the impact and the alleviation of congested roadways still remain salient and relevant issues.

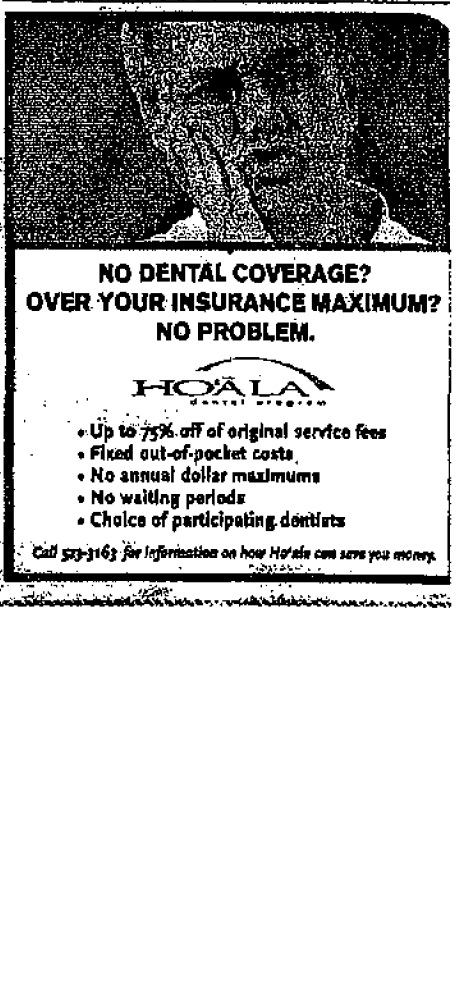
I believe this multi-billion dollar project is a wonderful vehicle to enrich a few at the expense of the many. This is a make-work project to keep a select group of residents employed while bei subsidized by their neighbor This is not an economic stir ulus project. It is a government redistribution of wealth projec

I understand the polls ha spoken. I respect the proces But I don't think the process w respectful to us. The DE process provides for additio al public input. The ramificatio of this project demand prece public discussion without fl grant favoritism from either sid The public deserves the oppo unity to participate in th ongoing process and reserves t right to act accordingly if re elations about the project con pels them back to the poll Remember, there are tens thousands of signatures on t Stop Rail Now ballot that cou be expanded, thereby placing t question of rail on the 2010 ba lot.

The rail project is not a do deal.







AR00002133

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, 3RD FLOOR
HONOLULU, HAWAII 96813
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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT11/08-288852R

Mr. Mark R. James
2911 Pacific Heights Road
Honolulu, Hawaii 96813

Dear Mr. James:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraph addresses your comments regarding the above-referenced submittal:

Your agreement with Mr. Hamada concerning his November 19, 2008 article in Midweek the need for additional assessment of the details contained in the Draft EIS is noted. The Final EIS provides additional evaluation. This document has been reviewed by the FTA and other pertinent government agencies and reflects their reviews.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
Creation Date :	12/9/2008
Creator Affiliation :	
First Name :	Chris
Last Name :	Jansen
Business/Organization :	
Address :	95-205 Paeheu Pl.
Alternative Preference :	
Apt./Suite No. :	
City :	Mililani
State :	HI
Zip Code :	96789
Email :	chris398_@hotmail.com
Telephone :	808-626-5841
Telephone Extension :	
Add to Mailing List :	Standard
Submission Method :	Website
Other Submission Method :	
Submission Date :	12/09/2008
Submission Content/Notes :	I believe that the Rail Transit route should go to the airport and not through Salt Lake. Our economy depends on Tourism and this would help tourists adjust better to our big city atmosphere as they make their way to their Waikiki hotels. Sure taxi drivers and others in the transportation business won't like this. But our government has to look "at the big picture" here and do the right thing. I also feel that the beginning construction and operation of transit should start in a more heavily populated area. Such as Aiea to downtown. And NOT starting from Kapolei with construction and operation heading Eastward. "Biggest bang for the buck" and not catering to political special interests! Please! No more talk and studies. Just do it! Mahalo

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 1, 2010

RT9/09-331585

Mr. Chris Jansen
95-205 Paeheu Place
Mililani, Hawaii 96789

Dear Mr. Jansen:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall indentify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

Your preference for the Airport Alternative has been noted. While each of the alternatives discussed in the Draft EIS includes trade-offs between benefits and impacts, the Airport Alternative from East Kapolei to Ala Moana has been identified as the Preferred Alternative as described above. Compared to the other alternatives discussed in the Draft EIS, the Airport Alternative will carry the most passengers, provide the greatest transit-user benefits, and result in the fewest vehicle hours of delay. It will provide access to employment centers at Pearl Harbor Naval Base and Honolulu International Airport and will serve the Salt Lake neighborhood with connecting bus service. Of the three Build Alternatives addressed in the Draft EIS, the Airport Alternative will have slightly lower impacts to the natural and built environment. During the public comment period on the Draft EIS, the public overwhelmingly supported the Airport Alternative. Of the comments that specifically supported one of the alternatives, more than 75 percent were in support of the Airport Alternative.

With the Airport Alternative, visitors and residents will benefit by having more transportation options. Table 3-13 in the Final EIS shows daily person transit trips by person, broken down for residents and visitors. As seen in this table, transit trips for both groups increase with the addition of the Project compared to the No Build Alternative. Daily resident person trips by transit increase 24 percent with the Project compared to without, while daily visitor person trips by transit increase 19 percent with the Project

compared to without the Project in 2030. As stated in Section 3.4.2, approximately 9,900 visitors will use the fixed guideway daily, of which about 1,800 will be traveling to or from the Airport.

As described in Section 2.5.10, Project Phasing, and further in Section 8.6.9, Construction Phasing, in the Final EIS, to support phased opening, the first construction phase must be connected to a maintenance and storage facility, which requires considerable space. No location has been identified closer to Downtown with sufficient available space to construct a maintenance and storage facility. Therefore, construction will begin between East Kapolei and Leeward Community College. The Project will be constructed in phases to accomplish the following:

- *Match the anticipated schedule for right-of-way acquisition and utility relocations.*
- *Reduce the time that each area will experience traffic and community disturbances.*
- *Allow for multiple construction contracts with smaller contract size to promote more competitive bidding.*
- *Match the rate of construction to what can be maintained with local workforce and available financial resources.*
- *Balance expenditure of funds to minimize borrowing.*

The portion of the corridor in the Ewa direction of Pearl Highlands is less developed than the areas in the Koko Head direction. Right-of-way can be obtained more quickly at the west end of the Project; therefore, overall project construction can begin earlier, resulting in lower total construction costs. Construction is planned to continue uninterrupted in the Koko Head direction from Pearl Highlands to Aloha Stadium, Kalihi, and finally to Ala Moana Center.

As portions of the Project are completed, each will be opened incrementally so that system benefits, even if limited during the initial phases, will be realized prior to completion of construction of the entire Project.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
Creation Date :	1/23/2009
Creator Affiliation :	
First Name :	Sue
Last Name :	Jansen
Business/Organization :	
Address :	95-205 Paeheu Pl.
Alternative Preference :	
Apt./Suite No. :	
City :	Mililani
State :	HI
Zip Code :	96789
Email :	
Telephone :	387-7507
Telephone Extension :	
Add to Mailing List :	Standard
Submission Method :	Website
Other Submission Method :	
Submission Date :	01/23/2009
Submission Content/Notes :	It is much more akamai to have the train route go to the airport. You need a relaxed less stressful way of getting tourists to Waikiki. This will help. Also it makes more sense to start building the train in the more popululated or higher potential use area. Starting to build the train in Ewa will not generate much ticket sales and what if the project is put on hold due to lack of funds, etc. Then you have a train only benefiting a few. Start building it at the airport,Waikiki or near UH. And build out from there. I know my ideas will generate extra costs but lets do this the right akamai way!

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, 3RD FLOOR
HONOLULU, HAWAII 96813
Phone: (808) 768-8305 • Fax: (808) 768-4730 • Internet: www.honolulu.gov

MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-334275

Ms. Sue Jansen
95-205 Paeheu Place
Mililani, Hawaii 96789

Dear Ms. Jansen:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

Your preference for the Airport Alternative has been noted. While each of the alternatives discussed in the Draft EIS includes trade-offs between benefits and impacts, the Airport Alternative from East Kapolei to Ala Moana has been identified as the Preferred Alternative as described above. Compared to the other alternatives discussed in the Draft EIS, the Airport Alternative will carry the most passengers, provide the greatest transit-user benefits, and result in the fewest vehicle hours of delay. It will provide access to employment centers at Pearl Harbor Naval Base and Honolulu International Airport and will serve the Salt Lake neighborhood with connecting bus service. Of the three Build Alternatives addressed in the Draft EIS, the Airport Alternative will have slightly lower impacts to the natural and built environment. During the public comment period on the Draft EIS, the public overwhelmingly supported the Airport Alternative. Of the comments that specifically supported one of the alternatives, more than 75 percent were in support of the Airport Alternative.

As described in Section 2.5.10, Project Phasing, and further in Section 8.6.9, Construction Phasing, in the Final EIS, to support phased opening, the first construction phase must be connected to a maintenance and storage facility, which requires considerable space.

No location has been identified closer to Downtown with sufficient available space to construct a maintenance and storage facility. Therefore, construction will begin between East Kapolei and Leeward Community College. The Project will be constructed in phases to accomplish the following:

- *Match the anticipated schedule for right-of-way acquisition and utility relocations.*
- *Reduce the time that each area will experience traffic and community disturbances.*
- *Allow for multiple construction contracts with smaller contract size to promote more competitive bidding.*
- *Match the rate of construction to what can be maintained with local workforce and available financial resources.*
- *Balance expenditure of funds to minimize borrowing.*

The portion of the corridor in the Ewa direction of Pearl Highlands is less developed than the areas in the Koko Head direction. Right-of-way can be obtained more quickly at the west end of the Project; therefore, overall project construction can begin earlier, resulting in lower total construction costs. Construction is planned to continue uninterrupted in the Koko Head direction from Pearl Highlands to Aloha Stadium, Kalihi, and finally to Ala Moana Center.

As portions of the Project are completed, each will be opened incrementally so that system benefits, even if limited during the initial phases, will be realized prior to completion of construction of the entire Project.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Honolulu High-Capacity Transit Corridor Project

Welcome to the Honolulu High-Capacity Transit Corridor Project's Public Hearing for the Draft Environmental Impact Statement/Section 4(f) Evaluation.

This public meeting and hearing has been designed to inform the public about the transit project, explain materials contained in the Draft EIS, answer questions from the public, and collect public input on project issues related to the Draft EIS, Section 106 of the National Historic Preservation Act, Section 4(f) of the U.S. Department of Transportation Act, and floodplains affected by the project.

Please review the project information and ask project staff any questions about the project that you might have. The Draft EIS is available on the project website at www.honolulutransit.org.

You may provide official comments in several ways. Here at this Public Hearing you may provide oral comments to a court reporter who will record them for the record or use this form to provide written comments. After the meeting, you may provide an on-line comment at www.honolulutransit.org or use this form to send a written comment to the Department of Transportation Services. All comments must be postmarked or received by January 7, 2009 in order for them to be included in the Final EIS.

Name: Zoe JARVIS Address: P.O. Box 1644

Phone: 808-696-3369 Waianae HI 96792

E-mail: —

Comment(s):

We need a second road from Waianae to Kapolei to provide access to the train/rail project. I back the rail thru Pearl area and airport into town, eventually to Manoa Univ. of H.I. Please start in Kapolei area so you can start earlier as there is plenty of area to work on the construction.

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-331799

Ms. Zoe Jarvis
P.O. Box 1644
Waianae, Hawaii 96792

Dear Ms. Jarvis:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall indentify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

Your request for an additional roadway from Waianae to Kapolei has been noted. Creation of this roadway is outside the scope of this Project. However, this Project does not preclude such a roadway from being constructed in the future.

Your support to begin phasing in Kapolei has been noted. As described in Section 2.5.10, Project Phasing, and further in Section 8.6.9, Construction Phasing, in the Final EIS, to support phased opening, the first construction phase must be connected to a maintenance and storage facility, which requires considerable space. No location has been identified closer to Downtown with sufficient available space to construct a maintenance and storage facility. Therefore, construction will begin between East Kapolei and Leeward Community College. The Project will be constructed in phases to accomplish the following:

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Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

018713

February 2, 2009

RECEIVED
09 FEB 6 P1:29
DEPT OF TRANSPORTATION SERVICES
DIRECTOR'S OFFICE

Department of Transportation Services
650 South King Street, 3rd Floor
Honolulu, Hawaii 96813

RE: Draft Environmental Impact Statement (DEIS)

Dear Sir or Madam:

As CPA's, we support **viable** and **affordable** traffic solutions for the City and County of Honolulu. We find several flaws regarding funding for the proposed rail project currently estimated to cost $5.5 billion for the airport route adopted on January 28, 2009 and summarized in Section 6 of the Draft Environmental Impact Statement (DEIS). We believe these flaws are of such magnitudes that not only will this project be neither viable nor affordable; this project will jeopardize our City and County's financial health and sustainability.

How realistic are the funding assumptions?

The basis for funding the proposed rail system is a 1/2% excise surcharge assessed on county transactions from January 1, 2007 to December 31, 2021. Using the City's figures provided in Section 6 of the DEIS, this surcharge needs to generate a minimum of $4.1 billion. The cash flow statement of the DEIS includes surcharge tax collections through 2023, two years past the 2021 collection expiration date provided by law. When the taxes for the additional two years are deleted from the City's projection, the required collections are short by $473.5 million (Exhibit A).

The collections from January 2007 to December 2008, total $294 million, substantially below the City's projections. It would require a minimum tax growth rate of 9.46% every year for thirteen (13) years (Exhibit B). Based on the Honolulu's economic history and the current global economy, this growth rate is unattainable.

What do the economists say?

The Council on Revenues (the economic board that provide forecasts of tax revenues to the Governor and State Legislators) issued new tax collection forecasts on January 12, 2009 (Exhibit C.) The forecast for growth in Hawaii tax revenues for 2009 through 2015 are -3.1%, 1%, 3.5%, 5.3%, 6%, 6.5%, and 6.5%. Using these forecasts, it would require an increase, compounded annually, in collections of 25.29% from 2016 to 2021 (Exhibit D). These forecasts do not include the additional cost for borrowing funds due to the shortfall in surcharge tax collections. This rate of required growth in tax collections is unattainable based on our economic history.

The funding should be based on the economic realities and reasonable factors:

1. 2007 and 2008: The actual surcharge collections
2. 2009 through 2015: The Council on Revenues forecasts
3. 2016 through 2021: Using a 6.5% growth rate of collections

Based on the above assumptions, the City will experience a **$1.26 billion shortfall** by the year 2021 (Exhibit E).

How much will the federal government contribute?

The DEIS estimates this rail project will cost approximately $5.5 billion, with $ 1.4 billion to be provided by the U.S. Department of Transportation. The federal funds are to be paid through their "New Starts" grants in the amount $200 million per year for seven [7] consecutive years. The 2009 budget for "new starts" is $1.475 billion for 30 grants that were selected from mass transit program applications from municipalities nationwide. The average grant is $47 million with two-thirds [2/3] of the grants going to cities with populations averaging 5.4 times the size of Honolulu. The average grant for smaller cities such as Honolulu is $23.5 million. There is great competition for these grants. The DEIS assumption that Honolulu will successfully obtain 1/7 of the country's mass transit budget for seven consecutive years is unrealistic and not viable.

What are the risks?

- Honolulu could have a rail system that is never completed. With no monies available to complete the project, the useless concrete pillars will be a monument to an irresponsible act that will mar our landscape for years to come.
- Honolulu's credit rating could plummet resulting in higher unbudgeted costs for interest on borrowed funds.
- Residents could face tax increases to pay for the shortage that will put undue economic pressure on them and future generations.
- Honolulu could be bankrupt due to all the debt that even future generations cannot service.

The City and County of Honolulu has a duty to its residents and taxpayers to act appropriately and prudently when committing our resources to traffic solutions. **The solutions must be viable and affordable.** We await your response to our concerns.

Very truly yours,

Janet I. Jensen, CPA
728 Elepaio Street
Honolulu, Hawaii 96816
Telephone: 808.735.3797
Facsimile: 808.734.0189
Email: jj@mangotre.com

Kathleen S. Meier, CPA
629 Palawiki Street
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B. Jeannie Hedberg, CPA
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Honolulu, Hawaii 96813
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Joe Wikoff CPA, Wikoff Combs & Co., LLC
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Honolulu, Hawaii 96813
Telephone: 808.791.1430
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David Latham, CPA
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Facsimile: 808.521.5065
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DEPARTMENT OF TRANSPORTATION SERVICES

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT2/09-298713R

Ms. Janet I. Jensen
728 Elepaio Street
Honolulu, Hawaii 96816

Dear Ms. Jensen:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

The Final EIS includes General Excise and Use Tax (GET) surcharge collections through December 31, 2022, in accordance with City Ordinance 05-027 which established the 0.5 percent County surcharge on the GET through this date. As shown in Table 6-4 in the Final EIS, the net GET surcharge revenue will equal $3,524 million (YOE $). The analysis in Chapter 6 of the Final EIS takes the current economic downturn into account.

Section 6.6 of the Final EIS discusses risks and uncertainties associated with the funding assumptions for the Project. A subsection under Section 6.6.3 has been added since the Draft EIS was published to address the Council on Revenues' forecasts. As stated in this section, in the short-term, GET surcharge revenues are subject to uncertainties related to the magnitude and timing of the economic recovery on Oahu. Over the long-term, GET surcharge revenues on Oahu depend on a variety of underlying economic factors outside of the City's control that may result in a higher or lower projection than the one used in this EIS.

While GET surcharge collections have gone down, so too have the costs of the Project. However, if GET surcharge revenues and/or Federal funding are not sufficient to meet the cash-flow requirement to cover capital expenditures, other potential revenue sources will be developed to close the funding gap.

The financial plan is balanced for the entire Project so there will not be a situation in which only a portion of the system will be built. If there is a shortfall, additional revenue sources will be identified. As noted above, Section 6.6 of the Final EIS discusses risks and uncertainties, as well as the potential sources to cover shortfalls.

The magnitude and timing of Federal funding is one source of risk that is discussed in Chapter 6 of the Final EIS. Density and transit use in the corridor are among the highest in the nation and higher than most areas that have qualified for New Starts funding in recent years. This Project has been developed in coordination with FTA since its inception. There is no indication to suggest that the Project will not qualify for the Federal funding requested.

The financial plan was developed in consideration of safeguarding the City's credit rating in light of the likelihood of General Obligation bond sales required to bridge any year-by-year funding shortfalls, with all debt service costs paid with GET surcharge revenues, because FTA Section 5309 will pay for some financing costs. The New Starts funds are also proposed for a significant increase in the latest Federal budget proposal. Further, there has been no indication from the FTA that the requested amount is unreasonable or unrealistic.

As discussed in Section 6.4.2 of the Final EIS, the City's contribution to transit operation and maintenance is currently funded through Federal funding, fare revenues, and the City's General and Highway Funds. This funding will be used to fund operating and maintenance costs of the Project. The General Fund includes property tax revenues and other taxes and fees. Beyond collection of property taxes that fund City operations, for which the City develops rates on an annual basis and part of which will fund transit services, there is no anticipated impact to property taxes. Fixed guideway operation costs will represent between 2 and 3 percent of the City's annual operating budget. Property tax revenues are not expected to be used to fund construction of the Project.

The financial plan is structured to ensure Honolulu will not go bankrupt. The debt amount is a minor part of the Project at less than 10 percent.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

From: Pearl Johnson [mailto:pearlj@hawaii.rr.com]
Sent: Friday, February 06, 2009 11:54 AM
To: Yoshioka, Wayne
Subject: Rail DEIS

I think that the Honolulu High Capacity Transit Corridor Project DEIS is quite inadequate. A supplemental DEIS must be produced to address many unanswered questions:

1. Will any stations have restrooms?
2. How can the streets over which rail will run not lose lanes when such large columns will be placed in the middle?
3. What will be done to counteract the darkness resulting from train bed over narrow streets such as Kona and Halekauwila Sts? Has the cost been factored into the maintenance cost?
4. Why does the train start in Kapolei? The stated reason of starting at the maintenance facility is inadequate. Every other new system was started in the city, where the riders are. How did other systems cope with the distance from maintenance?
5. How high will the Ala Moana station be?
6. Why are whole communities of poor people, such as the Banana Patch, being displaced when the DEIS plainly states that they will be unable to find comparable homes with the compensation to be offered? Elsewhere in the document re-alignments are suggested to save historic buildings. But no such measures are considered necessary when it is only poor people that are in the way of the train or a parking lot.
7. The unsightliness of elevated rail's impact on tourism, the city's main industry, is not addressed. Why would anyone want to come here when it will be as ugly and noisy as Brooklyn or Chicago?

The supplemental DEIS should be available at no cost to those who request it, so please do not make it fancy and expensive.

Pearl Johnson
2404 Kanealii Ave.
Honolulu, HI 96813
808-537-5471

2/9/2009

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT10/09-335807

Ms. Pearl Johnson
2404 Kanealii Avenue
Honolulu, Hawaii 96813

Dear Ms. Johnson:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following addresses your comments regarding the above-referenced submittal:

Your comments will be addressed in this letter in the same format as submitted.

1. *Each station will have a secured public restroom. Patrons will ask the station attendant for access to the restroom.*

2. *As stated in Chapter 3 of the Final EIS, columns to support the fixed guideway will be placed to minimize effects on traffic patterns. Table 3-21 in the Final EIS presents information on how column placement will affect streets and highways. In some cases, widening the median to accommodate columns will require a slight reduction in lane widths. Right-of-way will also be acquired in a few locations. As shown in the table, travel lanes will not be taken away.*

3. *The guideway will provide shade, but its typical width of 30 feet will not block light from reaching the street. Shade and shadow effects are described in Section 4.8 of the Final EIS. Project design is considered in the maintenance cost estimate.*

4. *As described in Section 2.5.10, Project Phasing, and further in Section 8.6.9, Construction Phasing, in the Final EIS, to support phased opening, the first construction phase must be connected to a maintenance and storage facility, which requires considerable space. No location has been identified closer to Downtown with sufficient available space to construct a maintenance and storage facility. Therefore, construction will begin between East Kapolei and Leeward Community College. The Project will be constructed in phases to accomplish the following:*

    - *Match the anticipated schedule for right-of-way acquisition and utility relocations.*
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    The portion of the corridor in the Ewa direction of Pearl Highlands is less developed than the areas in the Koko Head direction. Right-of-way can be obtained more quickly at the west end of the Project; therefore, overall project construction can begin earlier, resulting in lower total construction costs. Construction is planned to continue uninterrupted in the Koko Head direction from Pearl Highlands to Aloha Stadium, Kalihi, and finally to Ala Moana Center.

    As portions of the Project are completed, each will be opened incrementally so that system benefits, even if limited during the initial phases, will be realized prior to completion of construction of the entire Project.

5. *Appendix B of the Final EIS includes detailed project plans, including a system profile. The Ala Moana Station platform will have an elevation of approximately 40 feet, which is approximately 35 feet above the existing ground.*

6. *There is no reasonable alternative to affecting The Banana Patch community. DTS has been coordinating with residents of the Banana Patch community since October 2008. Every household has been visited by City staff, right-of-way staff, and engineering staff to discuss the Project, as well as special needs and relocation assistance for residents who will be displaced. Strategic outreach was conducted for this neighborhood and it was found the residents were mostly interested in learning more about the right-of-way acquisition process. Residents*

asked when acquisition might occur, how their property would be appraised, and how soon they might receive compensation. Residents of the community did not object to being relocated to decent, safe, and sanitary housing in compliance with the Federal Uniform Relocation Assistance and Real Property Acquisition Policies Act. Nor was there concern expressed about keeping the community intact for relocation purposes. As stated in Section 4.4.3 of the Final EIS, "relocation services will be provided to all affected business and residential property owners and tenants without discrimination; and persons, businesses, or organizations that are displaced as part of the Project will be treated fairly and equitably."

7. *Aesthetic effects of the system are described in Section 4.8 of the Final EIS. The Project is substantially different from systems in New York and Chicago, as it will have a different structural design. There is no evidence that the Project will have a negative impact on the tourism industry. Section 4.19 of the Final EIS states that the economic forecast is for continued steady growth. Planned projects are intended to continue to encourage and enable economic growth in the region. Continued focus on tourism is anticipated.*

   The Project will offer tourists a transportation alternative that links them directly with many key destinations and reduces the need for a car. Table 3-13 of the Final EIS shows daily person transit trips by purpose, broken down for residents and visitors. As seen in this table, transit trips for both groups increase with the addition of the Project compared to the No Build Alternative. Daily resident person trips by transit increase 24 percent with the Project compared to without, while daily visitor person trips by transit increase 19 percent with the Project compared to without the Project in 2030. As stated in Section 3.4.2 of the Final EIS, approximately 9,900 visitors are expected to use the system daily, of which 1,800 are to or from the airport.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
Creation Date :	11/21/2008
Creator Affiliation :	
First Name :	John
Last Name :	Johnston
Business/Organization :	Shinseido Therapy
Address :	55 S. Kukui St.
Alternative Preference :	Airport
Apt./Suite No. :	D 2102
City :	Honolulu
State :	HI
Zip Code :	96813
Email :	john@shinseidotherapy.com
Telephone :	265-6477
Telephone Extension :	
Add to Mailing List :	Both
Submission Method :	Website
Other Submission Method :	
Submission Date :	11/21/2008
Submission Content/Notes :	100% behind the airport route! Let's get started. Already too much talking. Thank you, john

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-330582

Mr. John Johnston
55 South Kukui Street, D-2102
Honolulu, Hawaii 96813

Dear Mr. Johnston:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraph addresses your comments regarding the above-referenced submittal:

While each of the alternatives discussed in the Draft EIS includes trade-offs between benefits and impacts, the Airport Alternative from East Kapolei to Ala Moana has been selected as the Preferred Alternative as described above. As compared to the alternatives discussed in the Draft EIS, the Airport Alternative will carry the most passengers, provide the greatest transit-user benefits, and result in the fewest vehicle hours of delay. It will provide access to employment centers at Pearl Harbor Naval Base and Honolulu International Airport and will serve the Salt Lake neighborhood with connecting bus service. Of the three Build Alternatives addressed in the Draft EIS, the Airport Alternative will have slightly less impacts to the natural and built environment analyzed in the Draft EIS. During the public comment period on the Draft EIS, the public overwhelmingly supported the Airport Alternative. Of the comments that specifically supported one of the alternatives, more than 75 percent were in support of the Airport Alternative. For more information this selection is discussed in Section 2.4 of the Final

EIS. Since publication of the Draft EIS, design has been advanced, further analysis has been completed, and information has been added in response to comments on the Draft EIS and agency coordination. The Final EIS discusses the process that was used to select the Preferred Alternative, how comments were considered in the decision-making process, impacts and mitigation commitments.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
Creation Date :	11/24/2008
Creator Affiliation :	
First Name :	Kaimi
Last Name :	Judd
Business/Organization :	
Address :	
Alternative Preference :	
Apt./Suite No. :	
City :	
State :	HI
Zip Code :	96813
Email :	kaimijudd@hotmail.com
Telephone :	
Telephone Extension :	
Add to Mailing List :	Email
Submission Method :	Website
Other Submission Method :	
Submission Date :	11/24/2008
Submission Content/Notes :	The sequence of construction and operability should begin at the highest congestion point and where the short commutes will help at first - whether it be downtown or somewhere near it. Construction should continue to head out in both directions towards UH and especially out west. It should DEFINITELY have a stop at the airport. The stops should also be integrated with bus stops that have short circulations through the general area of the stop. See other successful systems such as BART that have built in stages - they follow the same sequence of starting construction and operability at the heart of the traffic and not out on the edges.

DEPARTMENT OF TRANSPORTATION SERVICES

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-330790

Ms. Kaimi Judd
kaimijudd@hotmail.com

Dear Ms. Judd:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

While each of the alternatives discussed in the Draft EIS includes trade-offs between benefits and impacts, the Airport Alternative from East Kapolei to Ala Moana has been identified as the Preferred Alternative as described above. Compared to the other alternatives discussed in the Draft EIS, the Airport Alternative will carry the most passengers, provide the greatest transit-user benefits, and result in the fewest vehicle hours of delay. It will provide access to employment centers at Pearl Harbor Naval Base and Honolulu International Airport and will serve the Salt Lake neighborhood with connecting bus service. Of the three Build Alternatives addressed in the Draft EIS, the Airport Alternative will have slightly lower impacts to the natural and built environment. During the public comment period on the Draft EIS, the public overwhelmingly supported the Airport Alternative. Of the comments that specifically supported one of the alternatives, more than 75 percent were in support of the Airport Alternative.

As described in Section 2.5.10, Project Phasing, and further in Section 8.6.9, Construction Phasing, in the Final EIS, to support phased opening, the first construction phase must be connected to a maintenance and storage facility, which requires considerable space. No location has been identified closer to Downtown with sufficient available space to construct a

maintenance and storage facility. Therefore, construction will begin between East Kapolei and Leeward Community College. The Project will be constructed in phases to accomplish the following:

- *Match the anticipated schedule for right-of-way acquisition and utility relocations.*
- *Reduce the time that each area will experience traffic and community disturbances.*
- *Allow for multiple construction contracts with smaller contract size to promote more competitive bidding.*
- *Match the rate of construction to what can be maintained with local workforce and available financial resources.*
- *Balance expenditure of funds to minimize borrowing.*

The portion of the corridor in the Ewa direction of Pearl Highlands is less developed than the areas in the Koko Head direction. Right-of-way can be obtained more quickly at the west end of the Project; therefore, overall project construction can begin earlier, resulting in lower total construction costs. Construction is planned to continue uninterrupted in the Koko Head direction from Pearl Highlands to Aloha Stadium, Kalihi, and finally to Ala Moana Center.

As portions of the Project are completed, each will be opened incrementally so that system benefits, even if limited during the initial phases, will be realized prior to completion of construction of the entire Project.

As discussed in Section 2.5.6 of the Final EIS, bus service will be enhanced and the bus network will be modified to coordinate with the fixed guideway system. Some existing bus routes, including peak-period express buses, will be altered or eliminated to reduce duplication of services provided by the fixed guideway system. Certain local routes will be rerouted or reclassified as feeder buses to provide frequent and reliable connections to the nearest fixed guideway station. Existing and future bus routes, including frequencies, are shown in Appendix D of the Final EIS.

The FTA and DTS appreciate your interest in the Project. The Final EIS has been issued in conjunction with the distribution of this letter. You may view the Final EIS on the Project website at www.honolulutransit.org. You may request a DVD of the Final EIS and additional content through the "Contact Us" tab on the website or by calling the Project hotline at 566-2299. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Status :	Initial Action Needed
Creation Date :	12/6/2008
Creator Affiliation :	
First Name :	Brent
Last Name :	Kagawa
Business/Organization :	
Address :	91-1120 Puahala Stret
Alternative Preference :	
Apt./Suite No. :	18R
City :	Ewa Beach
State :	HI
Zip Code :	96706
Email :	ba_kagawa@yahoo.com
Telephone :	
Telephone Extension :	
Add to Mailing List :	Both
Submission Method :	Website
Other Submission Method :	
Submission Date :	12/06/2008
Submission Content/Notes :	I am in favor of the rail system. I would like to know the following: 1) plans for police protection for the rail and for each individual station. 2) does the rail plan to run 24/7 and will police protection be provided? 3) are there plans for parking and security for the parking at each individual station? Thank you for your time.

DEPARTMENT OF TRANSPORTATION SERVICES

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-331298

Mr. Brent Kagawa
91-1120 Puahala Street, 18R
Ewa Beach, Hawaii 96706

Dear Mr. Kagawa:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall indentify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

Security, which will be coordinated with the Honolulu Police Department, will be provided during all operating hours. Security systems will be incorporated into all stations and vehicles. As discussed in Section 2.5.4 of the Final EIS, all stations, park-and-ride facilities, and vehicles will include security cameras that are monitored at all times of operation, will have audible and visual messaging systems, and an intercom link to the system operations center. Security personnel will also patrol the system; however, security personnel may not be physically located at all stations and on all trains at all times. Interior and safety lighting will be provided at all stations and park-and-ride facilities. As shown in Table 2-7 of the Final EIS, the system will operate between 4:00 a.m. and midnight.

As discussed in Section 3.4.3 of the Final EIS, park-and-ride facilities will be provided at East Kapolei, UH West Oahu, Pearl Highlands, and Aloha Stadium. As stated above, there will

be security provided at park-and-ride facilities, including security cameras, security personnel, and safety lighting.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Kaka'ako Business and Landowners Association

P.O.BOX 898
Honolulu, HI 96808
Tel: (808) 597-1102 Fax: (808) 591-6634

Mr. Ted Matley
U.S. Department of Transportation
Federal Transit Administration – Region IX
201 Mission Street, Suite 1650
San Francisco, CA 94105

November 28, 2008

Mr. Wayne Y. Yoshioka
Department of Transportation Services
City and County of Honolulu
650 South King Street, 3rd Floor
Honolulu, Hawaii 96813

Re: Request to extend the January 7, 2009 deadline for comments on the Honolulu High-Capacity Transit Corridor Project Draft EIS/Section 4(f) Evaluation

Dear Messrs. Matley and Yoshioka,

Kaka'ako Business and Landowners Association is a group of small businesses and landowners in Central Kaka'ako. We are requesting that the deadline for the comment period be extended two months beyond the January 7, 2009 deadline.

We will all be greatly impacted by the transit route through and stations in Kaka'ako. Some of us will be impacted more than others because of partial and full property condemnation. So it is important for us to try to understand the details of the draft EIS in order to submit comments. We do not have the expertise in this field nor do we have the staff to study the draft EIS. It will take us time to absorb all that is in the EIS. But because we are small businesses owners, we spend all of our time on our businesses and in these difficult economic times, it is all the more important that we keep an eye on our business. Compounding the issue is that December is the busiest time of the year for us and in January, many of us are closing our books for the fiscal year. We cannot afford to neglect our businesses.

By extending the comment period two months beyond January 7, 2009, it will get us past the holidays and our year end closing and also give us the time to learn about the EIS process and to make sensible comments.

Your consideration will be greatly appreciated.

Sincerely

Dexter Okada

RECEIVED
08 DEC 02 P 1:15
TRANSPORTATION SERVICES
CITY & COUNTY OF HONOLULU

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010 RT12/08-290254R

Mr. Dexter Okada
Kakaako Business and Landowners Association
P.O. Box 898
Honolulu, Hawaii 96808

Dear Mr. Okada:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraph addresses your comments regarding the above-referenced submittal:

The comment period duration was extended by 30 days to a total duration of 75 days. This period was longer than the 45- to 60-day periods typical for U.S. DOT Draft EIS documents.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Kaka'ako Business and Landowners Association

P.O.BOX 898
Honolulu, HI 96808
Tel: (808) 597-1102 Fax: (808) 591-6634

Mr. Ted Matley
U.S. Department of Transportation
Federal Transit Administration – Region IX
201 Mission Street, Suite 1650
San Francisco, CA 94105

February 3, 2009

Mr. Wayne Y. Yoshioka
Department of Transportation Services
City and County of Honolulu
650 South King Street, 3rd Floor
Honolulu, Hawaii 96813

Re: Comments on the Honolulu High-Capacity Transit Corridor Project Draft Environmental Impact Statement/Section 4(f) Evaluation

Dear Messrs. Matley and Yoshioka,

The Honolulu High-Capacity Transit Corridor Project(HHCTCP), the accompanying construction, and the Transit Oriented Development(TOD) will have a detrimental impact on the small businesses and small property owners in Kaka'ako. What makes it more tragic is that the purpose of the HHCTCP as stated in the Draft Environmental Impact Statement(DEIS) preface to connect Kapolei to University of Hawaii at Manoa will not be fulfilled. The DEIS trivializes the problems that the HHCTCP will cause. The DEIS also minimizes and pushes the mitigating steps into sometime in the future.

Kaka'ako Mauka is a mixed use(residential, commercial, service and light industrial) district under the jurisdiction of the State of Hawaii. In 2006, there were 1,479 businesses with 16,931 employees(3.7% of Honolulu's workforce). The 2006 annual sales of businesses was $2.02 billion. On Oahu, it is the farthest east industrial area that serves all of East Honolulu, much of the Windward area, and the urban core. Any disruption of the businesses in Kaka'ako will have a ripple effect through Honolulu's economy.

In the DEIS, it states:

1. P. i "... the Council of the City and County of Honolulu selected the Locally Preferred Alternative to be a fixed guideway project from Kapolei to the University of Hawai'i at Manoa(UH Manoa) with a connection to Waikiki."
2. P.1-19 "The continued operation of UH Moana as a commuter school along with the opening of UH West Oahu will generate a strong student transportation market in the study corridor."

With this in mind, the voters of the City and County of Honolulu voted on the rail transit issue, 53% for and 47% against. The initial segment will go from Kapolei to Ala Moana Shopping Center. On page 33 of the DEIS Appendix A, the station at the end of the initial segment at Ala

Moana Shopping Center will be 35-40 feet above the street level, nowhere close to clearing the newly built Nordstram extension of Ala Moana Shopping Center. So how will the transit reach UH Manoa or Waikiki? Page 33 of the DEIS Appendix A also shows a separate "future extension" that starts climbing from 40 feet at Pensacola Street to 90 feet to clear the Nordstram extension. But the DEIS does not discuss this extension. What about the problems that will arise because of this "future extension"? How will these problems be mitigated?

1. Visual impact
2. 90 feet columns to support the rail and the station
3. How will it come down on the Waikiki side of the Nordstram extension
4. How will it fit the narrow canyon of Kona street between the big buildings.

Without clarifying information in the DEIS, it can only be assumed that the "future extension" is either an impractical task or a cost prohibitive task because if the "future extension" is viable, then why build the station at 40 feet in the initial segment. This means that the Locally Preferred Alternative will not be achieved.

1. The traffic caused by students going to UH Manoa will not be relieved
2. The traffic caused by workers going to Waikiki will not be relieved
3. Businesses have suffered or closed down for nothing
4. Property owners have lost all or part of their property for nothing
5. Would the vote have been 53% to 47% if this information had been out before the election

Since the LPA goes to UH Manoa and Waikiki, the DEIS must validate how the route is going to get to UH Manoa and Waikiki from Ala Moana Shopping Center. If the problems are too great to mitigate, then alternative routes must be studied, Kapiolani Boulevard or King Street.

Far too often, when there is a construction project, there is too much hoopla that goes on about how much job the construction project creates. What is overlooked or trivialized is the cost of the damage or outright destruction of small businesses and properties in the construction area. The Honolulu High-Capacity Transit Corridor Project DEIS is no exception. There is no analysis of the economic damage that the project will have on the small businesses both in regards to revenue and cost.

1. P.S-6 "Displaced businesses would need to purchase or lease new commercial/industrial space, and the location where employees would work would change.... Where relocations would occur, affected property owners, businesses, or residents would receive compensation ..."

2. P.4-20 "Based on the ***relatively small numbers*** of parcels affected by full acquisitions ..."

3. P.4-153 "Construction work details will be developed ***during preliminary and final*** **design.** Effects could include dust, noise, and traffic disruption congestion, and diversion, as well as ***limited or temporarily*** lost access and parking to residences and businesses. ... The maintenance and storage facility, park-and-ride lots, and stations ***could*** be used for construction staging areas. Additional area would be identified by

contractor ***as needed***. ... Access to businesses near construction activities could be ***temporarily*** affected."

4. P.4-154 "Segments of Halekauwila and Queen Streets ***may*** be made temporarily one-way or have parking eliminated during construction."

5. P.4-155 "***During development of the Construction Safety and Security Plans***, measures would be identified to ***minimize*** effects on communities and their resources that address specific consequences anticipated at each location within the various communities, as well as ensure the safety of the public and the environment."

These are only sample excerpts from the DEIS. Instead of a detailed study of the impacts, many of the problems are trivialized by using terms such as "relatively small", "limited or temporarily" or "minimize" and solutions are pushed into the future, "during preliminary and final design", "as needed" or "may".

In Kaka'ako, there are many small businesses and properties around the current transit route. Some of the challenges that currently exist are:

1. Limited parking
2. Narrow street
3. Congestion
4. Building settling problems due to loose compaction of soil in the past
5. Water table close to ground level
6. Underground streams
7. Lack of area for dewatering
8. Old and fragile infrastructure

These challenges will be exacerbated by the construction. The DEIS does not come even close to addressing these challenges. The result will be the damaging or destruction of these small businesses.

In regards to TOD, the DEIS states:

P 4-166 "...the Project's primary indirect effect would be to alter development near the stations, bringing higher densities than presently planned...".

The rule of thumb often mentioned is that the TOD applies to areas within a quarter mile radius of the transit station. With the two stations in Kaka'ako, all of Kaka'ako becomes a TOD. With higher density comes higher property valuations thus higher property taxes. Higher properties taxes will make it difficult for small businesses to remain in Kaka'ako. What impact will the TOD and accompany rules have on the character of the Kaka'ako community and the support it provides to the rest of Honolulu? The DEIS does not address this issue.

The DEIS must be expanded to include:

1. A detailed analysis of whether the LPA can be achieved. What are the impacts of extending the initial segment from Ala Moana Center to UH Manoa?

2. The LPA was approved going through Salt Lake; yet the Airport alternative was included in the DEIS. Under the same logic, the DEIS should be expanded to include an analysis of alternative routes that will go from Iwilei to King Street or Kapiolani Boulevard.
3. A more detailed analysis of the impacts on construction on the communities.
4. A more detailed analysis of the impacts of TODs on communities.
5. More meaningful mitigating steps.

The HHCTCP should serve the communities of Honolulu. The communities should not serve the HHCTCP.

Thank you,

Dexter Okada

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT2/09-299155R

Mr. Dexter Okada
Kakaako Business and Landowners Association
P.O. Box 898
Honolulu, Hawaii 96808

Dear Mr. Okada:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

The Project has logical termini at East Kapolei and Ala Moana Center and independent utility from any extensions that may be constructed in the future. The future extensions to West Kapolei, Salt Lake Boulevard, Waikiki, and UH Manoa are discussed in the cumulative impacts sections of Chapters 3 and 4 of the Final EIS. However, the future extensions are not part of this Project; thus, they are not required to be evaluated under Chapter 343 of the Hawaii Revised Statutes and NEPA. Under NEPA, environmental analysis is only required when there is a proposed action by a Federal agency. Here, because the future extensions are not proposed for implementation at this time, they are not part of the Project studied in the Final EIS. It would be premature to undertake an environmental analysis of the extensions (beyond the cumulative impacts analysis) because they are not part of the proposed action to be taken by the City and FTA. If the future extensions are proposed for implementation in the future,

environmental analysis of the extensions and appropriate alternatives will be undertaken at that time.

Future extensions are not precluded nor made impractical or cost-prohibitive by the Project evaluated in the Final EIS. The 35-foot station at Ala Moana Center is a practical solution for the first construction project to serve the shopping center and area properties. In the future, when funding is available, the extension would be designed to best accommodate the extension. The high level option over the shopping center will still be an available option, if needed, in the future and does not obviate the need for the 35-foot option that is part of the Project and subject of this EIS. There are operating plans for the system that will continue to rely on the 35-foot station even after an extension is built. The five numbered conclusions in the comment are not accurate representations of the long-term intent of the City or the Project.

The Draft and Final EISs describe the entire proposed action of construction and operation of a fixed guideway transit system between logical termini in East Kapolei and Ala Moana Center. The Locally Preferred Alternative selected by the City Council includes both the Project and planned extensions that are included in the long-range plan for the system, but are not part of the Project. When the planned extensions are evaluated in the future, a range of alternatives will be evaluated for each of them. However, based on conceptual information, the planned extensions are discussed in the cumulative impacts sections of Chapters 3 and 4 of the Final EIS.

Economic impacts, including impact to businesses during construction, are presented in the Final EIS. The Final EIS does not distinguish between sizes of businesses in terms of analyzing construction impacts. Section 4.18.1 of the Final EIS lists mitigation measures to reduce adverse economic hardships for existing businesses (including small businesses) along the project alignment during construction.

Regarding Item 1 on the list, as stated in Section 3.5.4 of the Final EIS, on-street parking by construction workers will not be permitted near work sites. Because of the limited amount of parking available to residents and businesses in and around construction sites, construction workers will not be allowed to park their personal vehicles in the public right-of-way. Construction workers also will not use commercial parking facilities if doing so reduces available parking for customers or employees of that business. Contractors would need approval from business owners before private lots can be used for parking. Regarding Items 2 and 3, as stated in Section 3.5.7 of the Final EIS, a Maintenance of Traffic (MOT) Plan will be created by the construction contractor with approval from the City and State Transportation Departments. The MOT Plan will mitigate construction-related effects on transportation, including temporary lane closures as identified in Table 3-27 in the Final EIS.

Items 4 through 8 are related primarily to dewatering and construction methods. The primary guideway construction method (drilled shaft foundations) was chosen to reduce the level of potential impact related to these concerns. Section 4.18.5 of the Final EIS indicates that contractors will be required to provide mitigation for vibration levels during possible pile driving activities (where drilled shafts cannot be used) within 75 feet of buildings. The section also indicates that utilities within 25 feet of pile driving may need to be further evaluated during project design to establish whether mitigation is needed. Similarly, Section 4.18.10 of the Final

EIS indicates that dewatering will be performed per Hawaii Department of Health permit requirements. Where settlement due to dewatering is a concern, ground-stabilization methods will be conducted to protect existing conditions. The section also indicates that induced settlement or movement of nearby facilities will not be permitted and that pre- and post-construction monitoring may be performed to ensure settlement does not occur.

As mentioned above, future extensions are not part of this Project; and thus, they are not required to be evaluated under Chapter 343 of the Hawaii Revised Statutes and NEPA. The Locally Preferred Alternative included both an Airport and Salt Lake Alignment. The language of the City Council's Ordinance 07-001 left discretion to the City on which portions of the Locally Preferred Alternative were to be built initially. Under City Council Resolution 08-261, the Project includes a single alignment via the Airport between East Kapolei and Ala Moana Center. Construction impacts are addressed in Sections 3.5 and 4.18 of the Final EIS. The Final EIS includes mitigation commitments for permanent and construction related effects.

As discussed in Section 4.19.2 of the Final EIS, transit-oriented development (TOD) is expected to occur in station areas as an indirect effect of the Project. The increased mobility and accessibility that the Project provides will also increase the desirability and value of land near the stations, thereby attracting new real estate investment nearby (in the form of TOD). Planning and zoning around station areas will be conducted by the City's Department of Planning and Permitting under a process covered by the City's new TOD ordinance.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

KAMEHAMEHA SCHOOLS

February 6, 2009

Mr. Ted Matley
U.S. Department of Transportation
Federal Transit Administration – Region IX
201 Mission Street, Suite 1650
San Francisco, CA 94105

Mr. Wayne Y. Yoshioka
Department of Transportation Services
City and County of Honolulu
650 South King Street, 3rd Floor
Honolulu, HI 96813

Re: Comments on the Draft Environmental Impact Statement/Section 4(f) Evaluation ("*DEIS*") for the Honolulu High-Capacity Transit Corridor Project ("*Project*")

Dear Messrs. Matley and Yoshioka:

Thank you for the opportunity to comment on the DEIS for the Project.

As a brief background, Kamehameha Schools ("*KS*") is a charitable educational trust, founded in 1887 through the Will and Estate of Princess Bernice Pauahi Bishop, whose mission is to provide educational opportunities to improve the capability and well-being of Native Hawaiians. KS currently offers a wide range of educational programs and services, including K-12 campus programs, preschools, financial aid, outreach programs, community education and collaborations with schools and community organizations. This past year, KS' programs and services reached more than 38,000 Native Hawaiian children and families.

In addition to providing educational programs and services, KS owns and maintains, as an important part of its ancestral and cultural legacy, over 365,000 acres of privately-held lands in Hawai'i. These lands are part of an endowment that provides the financial resources necessary to support these educational services and programs. As a Native Hawaiian educational organization, landowner and community member, KS has worked and continues to strive to work collaboratively with government, businesses, community organizations and others on solutions to the difficult challenges facing our families and communities, such as education, employment, housing, energy, food supply, sustainability, transportation and quality of life.

KS supports a rail transit system on Oahu as a long-term transportation solution. A rail transit system can provide a tremendous benefit to our communities by alleviating traffic congestion, reducing the use of fossil fuels, curbing urban sprawl, spurring development of communities and revitalizing our economy. We commend the City and County of Honolulu and the Federal Transit Administration for their hard work in initiating and carrying forward this important transit project and are appreciative of the extensive effort of our City leaders and their staff to study and publicize the impacts of this project.

We received a copy of the DEIS for the Project and understand that our role or kuleana in this prescribed process is to review the DEIS and provide productive comments to help best assure the Project's successful completion. We have taken this responsibility seriously. We met with tenants and other business owners and operators on KS lands who occupy properties potentially affected by the Project to become familiar with their concerns and interests. We also retained consultants to provide us with an independent review of specific aspects of the Project. The review of the thousands of pages of highly technical materials of the DEIS has taken time, and we appreciate your efforts in providing an extension of time for responses. It has made a meaningful difference in the quality of our review.

From this review, we have found many positive aspects to the DEIS and the proposed system. We have also identified, which is understandable in a document of this complexity, some items that we believe require additional study and work. In preparing our comments on those items, we have considered the potential impacts to our lands and our ability to continue to fulfill our educational mission with the returns generated from our lands; the potential impacts on the hundreds of small-and large business tenants and individuals on our lands; the potential impacts on communities where KS is diligently planning redevelopment and revitalization measures; and as appropriate, the broader potential impacts on our communities and families. In addition, we have tried to make our comments specific, productive and solution-oriented so that you may more easily address concerns with the appropriate particulars and move ahead with a successful project.

Our comments to the DEIS are set forth in full in **Attachment A** to this letter.

We thank you again for the opportunity to participate in this process and look forward to continuing to work collaboratively with the City to help assure the timely success of this important project, which will benefit our families and communities for many generations.

Mahalo.

Very truly yours,

Kirk Belsby
Vice President, Endowment
Kamehameha Schools

Enclosures

ATTACHMENT A

Kamehameha Schools ("***KS***") appreciates the opportunity to comment on the Draft Environmental Impact Statement/Section 4(f) Evaluation ("***DEIS***") for the Honolulu High-Capacity Transit Corridor Project ("***Project***") prepared by the City and County of Honolulu (the "***City***") Department of Transportation Services ("***DTS***") and the Federal Transit Administration ("***FTA***"). In order to provide comments that are helpful toward the success of the Project, KS retained consultants to conduct in-depth assessments of specific aspects of the Project. UltraSystems Environmental ("***UltraSystems***") was retained to provide a technical review of the Project and CBRE Consulting, Inc. ("***CBRE***") was retained to analyze the economic impact of the proposed Project. This process has enabled KS to offer the following comments on the Project and the DEIS.

I. IMPACTS OF CONSTRUCTION ON BUSINESSES

KS estimates that construction of the Project could affect over one hundred of its properties and approximately one thousand of its tenants and sub-tenants, and their businesses.[1] Research by CBRE indicates that businesses along the construction routes of major rail systems experience significant losses. While some disruption during construction is unavoidable, losses can be minimized if positive mitigation measures are taken.

A. Physical Impacts

Comment #1: Construction activities could have substantial economic impacts on businesses and more specific discussion of the construction impacts and proposed mitigation measures is requested.

1. **Information.** Although section 4.17 of the DEIS contains a discussion of construction phasing effects, a more detailed discussion of anticipated construction impacts and the scheduling of construction activity would help businesses understand the full extent of construction-related impacts. Information such as the following is requested: (a) the number of businesses directly affected by construction activity (*i.e.*, businesses located adjacent to a construction site and on property to be acquired by the City) and indirectly affected (*i.e.*, within one mile of a construction site), (b) for various segments of the line, a more detailed estimate of the length of the construction period from commencement to conclusion of construction, including any time needed to relocate utilities prior to the commencement of construction on the actual rail system, and (c) the proposed location of construction barriers, the amount of time that barriers will be in place, specific land and street closings, and rerouted traffic patterns during construction.

2. **Concerns about Construction Activity.** KS shares in the concern noted in the DEIS that construction will disrupt traffic and limit access to and from businesses in various ways. See DEIS section 3.5.3 at 3-46 and section 4.17.1 at 4-153 to -154. In some cases, direct access to businesses will be lost or curtailed. Construction will also result in loss of available parking.[2] The erection of fences around construction sites will diminish the visibility of certain businesses, thus reducing customer traffic. Even if a business maintains visibility during construction, there is a general tendency for people to avoid aesthetically unappealing construction sites, or avoid construction areas where traffic flow will be seriously compromised. KS is also concerned that construction will disrupt utility service during the length of the construction period, which KS understands could last from one to five years. More detail of these impacts by neighborhood is requested.

3. **Mitigation Measures.** The DEIS proposes a mitigation plan that touches upon some of the physical impacts of construction. The DEIS states that a Maintenance of Traffic ("***MOT***") Plan and

Transit Mitigation Plan ("***TMP***") will be developed to identify measures to mitigate temporary construction-related effects on transportation. See DEIS section 3.5.7 at 3-48. The DEIS discusses the goals that the MOT Plan and TMP should achieve. Building upon that discussion, the objectives of the MOT Plan and TMP could be advanced by inclusion of the following:

(a) Agreements by project construction contractors that they will (i) ensure by necessary means (including phasing of the work) that access to businesses in the project area be maintained during project construction activities, (ii) coordinate the timing of temporary facility closures to minimize impacts to business activities in the project area – especially those with seasonal or high sales periods, (iii) minimize, as practical, the duration of modified or lost access to businesses in the project area, (iv) provide advance notice when utilities are to be disrupted especially if disruptions will be during regular business hours, and schedule major utility shut-offs during non-business hours; (v) keep roadways as clean as possible by using street sweepers and wheel washers to minimize off-site tracking; (vi) during dry periods, apply water to exposed soils to minimize airborne sediment; (vii) properly maintain construction equipment to minimize unnecessary exhaust; (viii) locate stockpile areas in less visibly-sensitive areas and, wherever possible, place them in areas that are not visible from the road, or by residents and businesses; (ix) remove visibly obtrusive erosion-control devices (*e.g.*, silt fences, plastic ground cover, and straw bales) as soon as an area has been stabilized; (x) replace street trees and other vegetation that must be removed with appropriately sized vegetation; (xi) to the extent feasible, have the concrete decking along the cut-and-cover segments installed flush with the existing street or sidewalk levels; (xii) wherever feasible, maintain sidewalks at their current width during construction and where a sidewalk must be temporarily narrowed during construction (*e.g.*, deck installation), restore to its current width during the balance of the construction period; (xiii) construct site fencing of good quality, capable of supporting the accidental application of the weight of an adult without collapse or major deformation; (xiv) where major boulevards must be fenced, offer the business owners the opportunity to request covered walkways in lieu of chain-link fencing; (xv) where covered walkways or solid surface fences are installed, implement a program to allow for art work (*e.g.*, by local students) on the surface; and (xvi) where used, maintain in clean repair chain link fences.

(b) Provisions for public information campaigns to inform the community that businesses are open during project construction activities to encourage their continued patronage, including advertising of businesses.

(c) Provision for a public involvement plan prior to the beginning of project construction to inform business owners of the project construction schedule and activities and to understand their needs, and to appropriately address them, including (i) interviews of individual businesses potentially affected by construction activities to understand how these businesses carry out their work, and (ii) identifying business usage, delivery, and shipping patterns and critical times of the day and year for business activities, as well as alternate access routes to maintain critical business activities.

(d) Provisions for a program to (i) convey construction information to the community, (ii) provide public information (*e.g.*, press releases or newsletters) regarding construction activities and ongoing business activities, (iii) enable the community to "speak" to the appropriate persons at the FTA and the Rapid Transit Division of DTS ("***RTD***") during construction with a specific process for responding to community concerns in a timely manner, and (iv) install appropriate signage and lighting, and display other information to indicate that businesses in the construction area are open, and to direct both pedestrian and vehicular traffic to businesses via alternate routes.

(e) Provisions for a Business Disruption Mitigation Plan ("***BDMP***") whereby the FTA and RTD will work with community residents, elected officials, local businesses, and community

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organizations to tailor the mitigation program to meet community needs prior to the commencement of construction activities. KS requests that the BDMP (i) include remedies for business owners if the measures in the BDMP are not observed, (ii) be readily available for public review, (iii) have a process to inform the public of its progress in implementing the measures identified through a quarterly program of auditing, monitoring, and reporting, (iv) identify a staff person to work directly with the public to resolve construction-related problems, (v) provide for a field office during construction of the Project to address the matters described above, (vi) provide for an information and voice mail telephone line for community members and businesses to express their views regarding construction, with calls received reviewed by FTA and RTD staff and, as appropriate, forwarded to the necessary party for action (*e.g.*, utility company, fire department, resident engineer in charge of construction operations), and (v) provide for traffic management plans as described above.

B. Economic Impacts

Comment #2: KS requests that the discussion of economic impacts in the DEIS be expanded through an independent study and recommends certain mitigation measures.

1. Impact on Businesses. KS requests expansion of the economics impact analysis in the DEIS.[3] Presently, the DEIS provides discussion on (a) the effect of the Project on regional economics in the study corridor, including employment trends, growth, and real property tax; (b) the effect of construction on land use and economic activity; and (c) indirect effects of the Project on economic development, particularly focused on opportunities for transit-supportive development ("***TSD***") and transit-oriented development ("***TOD***"). KS suggests supplementing the discussion with an analysis of the economic impacts of the Project (both during and after construction) from the perspective of businesses and property owners along the rail line. For example, the impact of business closures or revenue losses should be added to the economic impacts analysis. As discussed further below, research conducted by KS' consultants regarding other transit projects indicates that construction of the Project could lead to the demise of a significant number of businesses.

Case studies of other major rail systems indicate that businesses situated along and surrounding the construction route can experience significant losses such as declines in customer numbers, sales, and in some cases, the closure of businesses. One of the most dramatic cases of this type of negative impact was in Salt Lake City, where an estimated 30 percent of local businesses closed during the construction of the TRAX system, and there were no mitigation strategies planned beforehand to reduce the impact on the businesses.

A similar situation occurred during the construction of SkyTrain's Canada Line in Vancouver. No public subsidies were provided to retailers and some businesses claimed that revenues dropped by 70 percent. On average, 40 to 60 percent losses in revenue have been reported. As of 2007, less than a year into construction, it was reported that between 40 and 60 businesses along the line had closed, with more likely to follow, as completion of the project is not expected until 2009.

If the Project will have similar economic impacts as the case studies discussed above, the economic loss to KS, its tenants, and their businesses will be significant. Negative impacts of construction could be further exacerbated due to the current economic climate that is already challenging the viability of many businesses.

2. Independent Study. In light of the physical and economic impacts referenced above, KS requests that the City retain an independent urban economist to conduct a study of the economic impacts of the Project both during and after construction. The geographic scope of the study should extend beyond the areas immediately adjacent to construction because the impacts can have a blighting

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effect on the surrounding community as well. The independent analysis should be based on case studies and empirical data taken from other communities with particular emphasis given to elevated transit systems similar to that proposed for Honolulu. It would also be helpful to study alternative systems (*e.g.*, at-grade) and routes to determine if these alternatives mitigate the expected pre- and post-construction impacts.[4] KS requests that the public, which has not had the opportunity to review the items, be given the opportunity to review and comment on the study before it is incorporated into the Final EIS.

3. Public Assistance Programs and Other Mitigation Measures. Case studies indicate that public assistance is essential to keeping businesses viable during construction. During the construction of Interstate MAX-Yellow, an extension to Portland's light rail network, the transit agency Tri-Met and Cascadia Revolving Fund came together to provide assistance to affected businesses. The businesses who received assistance had to demonstrate that the construction had negatively impacted their business revenues. The success of this program is illustrated by the fact that during construction, ***only one business of the 106 businesses located along the length of the light rail route closed as a direct result of construction, and only two businesses moved to another location.*** For the development of another extension of the light rail line, Tri-Met started the Business Support program for ground-floor retail businesses along the light rail construction route that may be disrupted due to their reliance on established pedestrian and transit traffic.

Salt Lake City is an example of a city that has learned from its experience of not investing in a public assistance program. When Salt Lake City built its first light rail line in 1999, nearly 30% of the businesses along the rail line closed. No mitigation strategies were planned beforehand to reduce the impact on the businesses. When the University Line extension was built in 2001, however, Salt Lake City sponsored a low interest loan program available to impacted businesses, which materially reduced business closures and economic impacts.

The case studies above highlight that well-conceived mitigation and public assistance can be effective in keeping businesses intact. Programs that we respectfully request for consideration include:

- Outright assistance
- Relocation assistance
- Rent subsidies
- Property owner compensation for lost rents
- Publicly funded business advertising and promotions
- Temporary real property tax relief

II. POTENTIAL PARKING IMPACTS OF COMPLETED SYSTEM

Availability of parking is important to the success or failure of the Project. Transit users who drive to stations will require parking or else be deterred from using the rail system. Thus, KS recommends that the City study and estimate the amount of parking that will be available to rail users and motorists in areas near transit stations after the Project is built.

A. Potential Parking Impacts

Comment #3: Inadequate parking for the Project will have economic consequences on surrounding businesses and properties.

U.S. transit systems often encounter problems with providing enough off-street parking and park-and-ride lots. This results in various adverse impacts to owners with businesses and properties located near transit stations.

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First, transit riders may be forced to find on-street parking, thus increasing traffic congestion in the area surrounding a transit station and/or park-and-ride lots, disrupting traffic flow, and reducing the number of street parking spaces available for non-transit users. Scarcity of parking can also be a deterrent to use of the rail system.

Second, transit users might park illegally in private retail and business parking areas, thus limiting further actual customer parking and/or increasing the cost of parking enforcement for business and property owners. An overall reduction in the amount of available parking spaces either on the street or in dedicated customer parking will discourage customers from patronizing businesses in the area.

Third, the uncertainty of the supply of parking negatively affects property owner redevelopment plans due to (i) concerns that additional lands may be condemned to provide for parking if ridership forecasts are achieved (or if ridership forecasts are not achieved and the agency determines a lack of parking availability to be the cause), or (ii) concerns that private property owners will be forced to mitigate the parking shortfall without public assistance. As acknowledged in the *Land Use Technical Repart Honolulu High-Capacity Transit Corridor Project* (RTD 2008b) dated August 15, 2008 ("***Land Use Technical Report***"), KS owns many properties near the proposed Pearlridge, Kapalama, Kaka'ako, and Mo'ili'ili stations and intends to engage in redevelopment of those properties when the current leases expire. See *Land Use Technical Report* at 5-2 to 5-11. Therefore, these are important concerns to KS.

KS offers the following comments to assist the City in the refinement of its parking plans:

1. **Quantify parking needs at each transit station in the Final EIS:** Planning for parking needs begins with quantifying the number of parking stalls required for each rail station.

2. **Kapalama Station:** It appears that the City does not plan to build additional parking spaces for users of the Kapalama Station. See DEIS at 2-31. It is unclear where users who drive to this station can park. KS requests that the Final EIS discuss the impact on commercial tenants adjacent to this station if no off-street parking is provided to station users and the empirical basis for the determination that no station parking facilities are required.

3. **Dillingham Boulevard from Kohou Street to the rear parking lot of Costco:** On the mauka side of the roadway, the DEIS provides that all through and left-turn lanes would be preserved by acquiring 10 feet of additional right-of-way on the makai side of the roadway. What traffic impact will the acquisition of an additional right-of-way have on parking for existing land uses where ROW is acquired and what mitigation is proposed? See *Transportation Technical Report Honolulu High-Capacity Transit Corridor Project* (2008a) dated August 15, 2008 ("***Transportation Technical Report***"), Table 5-32, at 5-85.

4. **Halekauwila Street from Nimitz Highway to Ward Avenue:** Most of the existing on-street parking would be removed. What impact would this have on existing off-street parking spaces for the commercial uses located along Halekauwila Street and what mitigation is proposed? See *Transportation Technical Report*, Table 5-33, at 5-86.

5. **Dillingham Boulevard from McNeill Street to Kohou Street:** Twenty-six off-street parking spaces would be lost on Dillingham Boulevard between McNeill Street to Waiakamilo Road due to fixed guideway column placement in the median. Ten off-street parking spaces would be lost on Dillingham Boulevard between Waiakamilo Road to Kohou Street due to fixed guideway column placement on the side. See *Transportation Technical Report*, Table 5-54, at 5-114. The loss of off-street parking could impact customer and employee parking at Waiakamilo Shopping Center and buildings on both sides of Dillingham. KS requests that the Final EIS discuss the impact of the loss of these off-street

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parking spaces on the commercial uses located on KS lands along Dillingham Boulevard and any proposed mitigation.

6. **Halekauwila Street from Keawe Street to Coral Street:** Sixteen on-street mauka and 22 on-street makai parking spaces would be lost on Halekauwila Street between Keawe Street to Coral Street due to fixed guideway column placement on the side. See *Transportation Technical Report*, Table 5-54, at 5-114. KS requests that the Final EIS discuss the impact of the loss of these on-street parking spaces on businesses located on KS owned properties and any mitigation proposed.

B. Mitigation Measures For Parking

Comment #4: The City is requested to develop more specific mitigation measures for parking.

KS notes that mitigation measures were included in the DEIS to address this issue, including the establishment of a neighborhood parking plan, but KS suggests the following additional measures:

1. **Early planning.** The DEIS appears to contemplate developing mitigation strategies for parking after significant commitments of resources have been made for the design and construction of each transit station. This is indicated by the fact that section 3.4.5 of the DEIS states that mitigation strategies for parking would be determined by surveying stakeholders within six months before implementation of fixed guideway service. See DEIS at 3-44. KS requests that specific parking strategies be devised and studied as part of this environmental review process.

2. **Parking study.** To ensure that parking impacts are fully addressed in the Final EIS, KS recommends a detailed parking study be performed for each transit stop that is predicated on the level of transit use occurring at each station and validating through more rigorous analysis how these users will access the site (*e.g.*, pedestrian access, transit access or vehicular access). Once the study is concluded, specific mitigation measures should be developed based on the results of the study and incorporated into the Final EIS.

3. **District parking solution.** District parking garages could be developed near rail stops and paid for through transit system funding. Such systems should be located with a view toward improving transit use and facilitating redevelopment within TOD corridors.

4. **Public assistance for building parking structures.** A program of subsidies, grants, or other assistance for the construction of parking structures could be provided. For example, Portland recently approved a $6.6 million subsidy for a parking garage for a TOD.

5. **Signage and parking permit program.** Adequate signage could be installed during and after construction for transit-parking areas and alternate business parking areas. A parking permit program could be created for on-street parking to limit impacts on local businesses by transit users monopolizing on-street parking.

III. IMPACTS OF COMPLETED SYSTEM ON BUSINESSES ALONG RAIL LINE AND AT TRANSIT STATIONS

KS owns properties containing approximately 229 acres in communities that would be directly affected by the rail system along Farrington Highway, Kamehameha Highway, Dillingham Boulevard, and Halekauwila Street in Kaka'ako. KS is concerned that the Project will affect visibility of and access to the businesses on KS' properties; limit the redevelopment options available to KS and other landowners; and narrow streets, among other impacts.

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A. Physical Impacts

1. Traffic, Visibility, and Access to Businesses

Comment #5: A more detailed assessment of the reduction in visibility and access to businesses and potential mitigation measures is requested.

a. Visibility. Presently, a significant percentage of KS' land holdings along the Project route are used for retail. Retail properties require good visibility to be successful. As the DEIS acknowledges on page 4-59, "*[b]usiness owners* have a vested interest in the visual environment surrounding their operations." KS is concerned that the elevated guideway will substantially reduce the visibility of businesses from the street level. As such, the discussion of visual impacts in the DEIS[5] should be expanded beyond impacts on views of "landmarks, significant views and vistas, historical and cultural sites, and Exceptional Trees." DEIS at 4-59. Impacts to visibility of businesses located along the rail line also should be considered.

b. Access. Businesses also depend on convenient access to and from their properties. The erection of the elevated guideway and its supporting columns, however, will eliminate left turn lanes, thus cutting off direct access to many businesses, requiring potential customers to take a circuitous route. Traffic patterns and the level of service in affected areas might change as a result. Added congestion would further discourage customers from visiting businesses along the guideway. As a related matter, to the extent the Project permanently eliminates existing street parking due to placement of the transit guideway, all of the parking-related impacts noted in **Comment #3** above become issues. Again, the number of parking spaces needed for each transit station needs to be determined carefully to prevent loss of business due to customer parking being occupied by transit users.

c. Narrower Lanes. The DEIS notes that in certain places, the widening of existing street medians to accommodate the columns would require reducing lane widths. See DEIS, Table 3-21, at 3-39; *Transportation Technical Report*, Table 5-29, at 5-80. Narrowing of lanes could increase the risk of traffic accidents. KS suggests that the Final EIS study such risk. KS specifically requests more information on the impact of reduction in lane widths to traffic on the following roadways that are aligned next to its properties, including (a) Farrington Highway and Waipahu Depot Road; (b) Kamehameha Highway and Kuleana Road; (c) Kamehameha Highway and Ka'ahumanu Road; (d) Kamehameha Highway and Kaonohi Street; (e) Kamehameha Highway and Lipoa Place; and (f) Kamehameha Highway and Pali Momi Street. A discussion of the impacts of lane narrowing on industrial uses (travel of large vehicles such as semi-trucks) in the Final EIS is particularly needed given the industrial uses in many of the impacted communities.

d. Mitigation. KS requests adoption of a mitigation plan that will (a) ensure there is adequate parking near transit stations; (b) maintain access to and from businesses; (c) maintain traffic circulation; (d) prevent traffic accidents; and (e) minimize loss of visibility due to the elevated system. To achieve these objectives, a detailed mitigation plan incorporating specific initiatives should be developed and incorporated as part of the Final EIS. Examples of the types of elements that might be incorporated into the mitigation plan include: (i) traffic signals with protected left turns at busy intersections; (ii) elongated left turning lanes off of the main roadways to accommodate the increase in motorists utilizing left turn lanes at busy intersections, and to alleviate backup along the main roadways; (iii) district parking near rail stops paid for through transit system funding; and (iv) update and supplement the traffic study contained in the *Transportation Technical Report* to address the comments stated above.

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2. Noise and Vibrations

Comment #6: Disclosure of noise and vibrations and their impact according to time of day.

It is our understanding that the noise analysis contained in the DEIS is based upon average hourly noise impacts rather than noise impacts at different times of the day. However, noise impacts can vary in significance depending on the time of day. For example, the impacts relative to background conditions may be more significant between 4:00 a.m. and 6:00 a.m. than during mid-day periods. Because these time-of-day differences may impact current and future uses differently, more complete disclosure of noise impacts by time of day is needed.

Assuming the DEIS used the noise impact criteria in the FTA's *Transit Noise and Vibration Impact Assessment* manual as the standard against which to evaluate noise exposures due to the Project, the impacts of noise on commercial should be studied further.

The noise sampling methodology utilized in the DEIS appears to be specific to ground level impacts. Because sound rises, there will be greater impacts on buildings (either existing or to be constructed in the future) that are constructed at heights above the proposed rail line. KS could not find discussion of these conditions in the DEIS and how the noise impacts of an elevated system might affect the viability of future TOD proximate to the rail line, particularly for uses that are noise sensitive such as residential.

3. Security, Transients, and Crime

Comment #7: Additional disclosures on security, transients, and crime are requested with more specific mitigation measures.

The Final EIS should disclose that in urban areas with hot and wet climates, such as Miami and Honolulu, elevated lines can provide shelter for the homeless, increasing crime and litter and thereby detract from commercial activity and result in lower property values. Transit stations also tend to attract graffiti.

The availability of parking and safety are interrelated issues. If parking is not available near transit stations, riders will need to find off-street parking within the district or travel to stations by walking. Without addressing the issue of security patrolling and providing ample parking in safe areas, riders will not want to park multiple blocks away and walk, especially at night, in order to get to and from the rail station and their vehicles.

The DEIS does not detail mitigation options to reduce concerns raised about area crime, property vandalism and an increase in transient persons using the elevated system as temporary shelter. KS requests the Final EIS provide specific mitigation actions to be undertaken. The mitigation measures could include: (a) use of landscaping and/or security fencing to minimize the ability of transients to assemble underneath the elevated rail lines; (b) adequate security on staff (dedicated security and/or Honolulu police) to patrol the stations and surrounding areas; (c) installation of surveillance cameras and equipment, emergency call boxes, and closed-circuit television monitoring; (e) locating police neighborhood substations at transit stations; (f) conducting regular maintenance and cleaning of areas under the rail line, transit stations, and surrounding areas; and (g) designing and installing structures underneath elevated rail lines that would discourage or prevent loitering by transients.

AR00002179

4. **Visual and Aesthetic Impacts**

Comment #8: The elevated system will cause visual blight and additional details on visual and aesthetic impacts for evaluation by viewer groups would allow a more complete analysis.

a. **Visual Blight.** An elevated system with platforms will cause visual blight. The elevated guideway will also cast shadows on adjacent buildings, reducing visibility. Glare and excessive lights from the rail line could adversely impact certain businesses during the day. Visual blight will also occur from deterioration of the system over time. These visual and aesthetic impacts may reduce tenant or customer interest in the area, increase turnover, and decrease property values. Thus, KS requests that the Final EIS include discussion of the estimated economic loss that visual impacts will cause, specific measures for mitigating such impacts, and the mechanisms for soliciting public input on mitigation measures.

b. **Expanding Study.**

i. The *Visual and Aesthetics Resources Technical Report Honolulu High-Capacity Transit Corridor Project* (2008e) dated August 15, 2008 (the "***Visual and Aesthetics Resources Technical Report***") utilized the methodology of the Visual Impact Assessment for Highway Projects[6] of the Federal Highway Administration ("***FHWA***") for the Project since it is a linear transportation facility comparable to a highway, has a similar range of issues, and because the FTA has not issued comparable guidance. The *Visual and Aesthetics Resources Technical Report* discusses how viewer groups have been categorized (*i.e.*, residents, commuter, etc.) and indicates that viewer response to change is impacted by viewer exposure and viewer sensitivity. See *Visual and Aesthetics Resources Technical* Report at 3-2. However, the analysis provided in section 5.0 (Consequences) of the technical report contains few to no details regarding user group exposure to project alternatives for different user groups, including such factors as location, duration, and distance. KS suggests that the Final EIS provide additional clarification regarding viewer exposure and viewer sensitivity for the selected view points. We recommend that the viewer exposure response include focus groups and outreach that encompasses a broad range of stakeholders. Property owners are not included among the five user groups asked to comment on visual impacts, but should be.

ii. The expanded study should also provide 360-degree visuals for multiple cross-sections of the rail line with particular emphasis given to transit stops. To provide representative visual imagery of the Project, such 360-degree studies should include areas within the urban core and areas within the suburban landscape. We would also recommend showing these images at multiple levels for each representative cross-section, including at street grade and at elevations of 2 to 3 stories.

c. **Utility Relocation.** The DEIS notes that the Project would involve relocation and modification of existing utilities. See DEIS at 4-38. KS is concerned about the impacts that relocating above ground power and telephone lines will have on existing commercial properties that are located on KS owned land in the Dillingham Plaza area and the area to the north and south of this property. Since ten feet of land in front of these commercial uses will be acquired to allow for widening of the median in this street, it is assumed that existing above-ground poles and power/telephone lines along this street will be moved back ten feet, bringing them even closer to these commercial uses, which include the Boulevard Saimin restaurant,[7] Sizzler restaurant, Burger King fast food restaurant, Popeye's Chicken fast food restaurant, and other uses along this street. Bringing utility lines even closer to existing commercial uses will detract from the appearance of these uses and limit access to the properties and the ability to maintain the properties in good repair.

AR00002180

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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June 11, 2010

RT2/09-299125R

Mr. Kirk Belsby
Kamehameha Schools
567 South King Street
Honolulu, Hawaii 96813-3036

Dear Mr. Belsby:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address comments regarding the above-referenced submittal:

I. Effects of Construction on Business

A. Physical Effects

Response to Comment #1 regarding construction effects on businesses

1. *Economic impacts during construction are presented in the Final EIS. Section 4.18.1 of the Final EIS lists mitigation measures to reduce adverse economic hardships for existing businesses (including small businesses) along the project alignment during construction. Access to businesses near construction activities could be temporarily affected but will be maintained. In several locations, left-*

turn lanes will be closed during construction, some streets may be made temporarily one-way or have parking eliminated during construction.

2. *The City will mitigate temporary impacts associated with construction. To reduce adverse economic hardships for existing businesses along the project alignment during construction the City will coordinate construction planning and phasing with nearby property owners and businesses; initiate public information campaigns, including signs and lighting, to reassure people that businesses are open during construction and to encourage their continued patronage; minimize the extent and number of businesses, jobs, and access affected during construction; to the extent practicable, coordinate the timing of temporary facility closures to minimize impacts to business activities—especially those related to seasonal or high sales periods; minimize, as practical, the duration of modified or lost access to businesses; phase construction in each area so as to maintain access to individual businesses for pedestrians, bicyclists, passenger vehicles, and trucks during business hours and important business seasons; and provide advance notice if utilities will be disrupted and scheduling major utility shutoffs during non-business hour.*

   Properties that are anticipated to be acquired by the Project, including businesses, are identified in Appendix C: Preliminary Right-of-Way Plans of this Final EIS.

   As discussed in Sections 4.18.1 and 4.18.2, the City will coordinate with property owners regarding both temporary impacts during construction and long term impacts. The City will notify and coordinate with adjacent property owners adjacent to the Project that will be temporarily impacted during construction and when the Project will require acquisition of property. Coordination will be on-going during both design and construction.

3. *Your suggestions regarding the Maintenance of Traffic (MOT) Plan and Transit Mitigation Program have been noted. Many of the suggestions are already discussed in the Final EIS, Section 4.18.1.*

   a. *Section 4.18.1 of the Final EIS states that, "access to businesses near construction activities could be temporarily affected but will be maintained." In addition Section 4.18.1 states, "to the extent practicable, [the Project will] coordinate the timing of temporary facility closures to minimize impacts to business activities—especially those related to seasonal or high sales periods" and "minimize, as practical, the duration of modified or lost access to businesses." As part of the City's coordination with businesses, advanced notice will be provided if utilities will be disrupted and shut-offs will be scheduled during non-business hours. Many of the other suggested elements in your letter will be incorporated into the construction contract documents as performance specifications or as design criteria that will be used by designers and contactors. Regarding the request for covered walkways in lieu of chain-*

link fencing, the contractor will be required to provide a covering if the Project affects an adjacent awning or where there is a potential for falling debris. Covering provided in other situations could be considered on a case-by-case basis, subject to City approval. In addition, allowing artwork on fences could also be considered on a case-by-case basis subject to City approval.

b. *Sections 3.5.7, 4.18.1, and 8.7 of the Final EIS discuss public involvement activities that will occur during construction. For instance, Section 4.18.1 states that public involvement activities will include signage and lighting to reassure people that businesses are open during construction.*
c. *As discussed in Section 4.18 of the Final EIS the City will coordinate with affected residents and businesses prior to construction. A public involvement plan will be developed prior to each construction phase that will detail outreach tailored to the construction phase. The City will maintain the Project website (www.honolulutransit. org) and telephone hotline, which will also provide information to the community regarding construction phasing.*
d. *The Final EIS discusses several approaches that will be taken to inform the public about construction activities. Section 8.7 of the Final EIS states that "the City will continue the use of the Speakers Bureau, the project website (www.honolulutransit.org), and a telephone hotline to inform the public about construction activities. Section 3.5.7 states that newsletters, local newspapers, radio and/or television spots, news releases, instant messaging lists, and fliers may also be used to provide information to the public. The hotline will provide the means for members of the public to talk to those working on the Project and ensure their specific questions are addressed. Lighting and signage will be used to reassure the public that businesses are open during construction. Signage will also be used to direct pedestrians and bicyclists to the safest and most efficient route through construction zones (Section 3.5.7) and to direct motorists of parking disruptions and alternatives.*
e. *Some elements suggested for the Business Disruption Mitigation Plan, such as having a staff person work directly with the public and property owners to resolve construction-related problems, will be part of the MOT Plan or public information program. The DTS will work with all adjacent property owners and their tenants during construction to minimize disruption to local businesses.*

B. Economic Effects

Response to Comment #2 regarding economic effects and mitigation

1. *An analysis of the impacts to businesses during construction is provided in both the Final EIS and the Honolulu High-Capacity Transit Corridor Project Economics Technical Report (RTD 2008c). An analysis of construction impacts is shown on Page 5-6 of the Economics Technical Report, which can be found on the project*

website at www.honolulutransit.org. The primary impacts are anticipated to result from inconveniences and disruptions to adjacent residents, businesses, and business customers that are inherent in any major construction project, which include the following:

- *Presence of construction activities and material.*
- *Temporary road closures and traffic diversions.*
- *Temporary reductions in parking availability.*
- *Airborne dust, noise, and vibrations.*
- *Businesses' loss of visibility to their customers.*

As discussed in Section 4.18 of the Final EIS, the City will mitigate these temporary effects to protect residents' and businesses' comfort and daily life, as well as to prevent inconveniences and disruptions to the flow of customers, employees, materials, and supplies to and from area businesses based on successful efforts on other projects.

The City will employ the following measures during construction:

- *Maintain access to businesses during construction.*
- *Develop a public involvement plan prior to construction to inform business owners of the construction schedule and activities.*
- *Initiate public information campaigns to reassure people that businesses are open during construction and to encourage their continued patronage.*
- *Minimize the extent and number of businesses, jobs, and access affected during construction.*
- *Coordinate the timing of temporary facility closures to minimize impacts to business activities—especially those related to seasonal or high sales periods—to the extent practicable.*
- *Minimize the duration of modified or lost access to businesses—as practicable.*
- *Provide signage, lighting, or other information to indicate that businesses are open.*
- *Phase construction in each area so as to maintain access to individual businesses for pedestrians, bicyclists, passenger vehicles, and trucks during business hours and important business seasons.*
- *Provide advance notice if utilities will be disrupted.*
- *Schedule major utility shut-offs during non-business hours.*

As discussed in Section 4.3.2 of the Final EIS, the Project will require the acquisition of some commercial and industrial properties. This will displace the businesses using the properties as well as their employees. However, it is anticipated that these businesses will be relocated to new sites. Once constructed, the Project will employ workers for maintenance and operation of the system. It is anticipated that workers will be hired from the existing local labor force and trained to meet job requirements. The number of new workers will be small compared to the total labor force on Oahu and is included in the operating and maintenance costs for the Project. Workforce costs are included in the operating and maintenance cost estimates discussed in Section 6.4.1. The Project is not expected to result in long-term adverse effects on the economy or property tax revenues. No mitigation measures will be needed.

2. *No independent evaluation study is planned.*

3. *The City will not provide direct financial assistance to mitigate temporary impacts during construction to businesses. Where acquisition of property will occur, compensation will be provided to affected property owners, businesses, or residents in compliance with all applicable Federal and State laws and will follow the Federal Uniform Relocation Assistance and Real Property Acquisition Policies Act.*

II. Potential Parking Effects of Completed System

A. Potential Parking Effects

Response to Comment #3 regarding parking

The comment involves three types of potential parking-related effects: lost on-street parking, spillover parking in station areas (referred to as "illegal parking" in original letter), and lost off-street parking, which may affect redevelopment. The number and location of on-street and off-street parking spaces to be removed by the Project are listed in Table 3-24 in the Final EIS. The estimated demand for spillover parking at each station is shown in Table 3-22 in the Final EIS.

Regarding the loss of on-street parking, a survey of parking usage conducted in June 2008, April 2009, and March 2010 found that, in locations where on-street parking will be removed by the Project, other parking capacity exists nearby to accommodate demand. Therefore, these on-street parking spaces will generally not be replaced by the City. However, some new on-street parking spaces will be created by the Project in the approximate locations of lost spaces as the streets are rebuilt after construction. New parking spaces could be short-term, long-term, or loading zones, depending on the need, as determined by the City.

Analysis conducted for the Project also examined potential effects from spillover parking. One possible effect of spillover parking would be an increase in demand for existing parking spaces near stations. As stated in Section 3.4.7 of Final EIS, the City will conduct a before-and-after parking study that will identify impacts of spillover parking both on-street and off-street, and will implement one or more of the following mitigation strategies as needed:

- *Parking restrictions;*
- *Parking regulation;*
- *Permit parking; and/or*
- *Shared parking arrangements.*

Follow-up surveys will be conducted by the City to determine if the mitigation strategy(ies) is effective, and additional measures will be implemented by the City as needed. Regarding transit riders parking illegally in private retail and business parking areas, that issue will also be included in the City's parking study and will be covered by one or more of the strategies listed above. Additionally, analysis was completed to determine if spillover parking will affect traffic and parking supply near stations. The traffic analysis was conducted for the a.m. and p.m. peak hours. The intersection level-of-service analysis determined that additional traffic from spillover parking will not affect local traffic conditions. Please see Addendum 02 to the Transportation Technical Report (RTD 2009i) for more detail.

The City will provide parking facilities at four stations (East Kapolei, UH West Oahu, Pearl Highlands, and Aloha Stadium). These stations were selected based on results from the travel demand forecasting model which showed these stations had high drive to transit demand. The City has identified the land that will be acquired for the Project as part of the right-of-way needed along the length of the corridor, including the land needed for the four park and ride facilities. Compensation will be in accordance with the requirements of the Federal Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970. The City does not anticipate acquiring any additional land for parking near any of the other stations. Additionally, regarding the limited supply of parking near stations affecting property owners' potential redevelopment plans, the City will develop parking regulations and strategies over time that respond to the specific needs of each station area.

The following text is in response to sub-comments 1-6 within Comment #3 of your letter:

1. *Parking needs at each transit station has been added to the Final EIS as Table 3-22.*

2. *Table 3-22 in the Final EIS shows an estimated demand of five parking spaces at the Kapalama Station. Rather than providing five parking spaces, the City intends to provide bus service, bicycle parking and improved sidewalks to encourage riders to access this station by modes other than the private automobile. The spillover parking surveys mentioned previously will assess spillover demand once the stations are opened and parking mitigation would be implemented as needed.*

3. *Along Dillingham Boulevard near Honolulu Community College, the City will purchase right-of-way to preserve the existing number of through- and turn-lanes. As shown in Table 3-24 of the Final EIS, this acquisition will result in the removal of approximately 30 off-street parking spaces that will be purchased in*

accordance with the requirements of the Federal Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970. The City does not plan to generally replace all of the private, off-street parking purchased and removed for construction of the Project; however, the Project will help reduce the need for such parking. Where landscaping, sidewalks, and driveway access will be affected by the Project, coordination will occur with the landowner, and these property features will be replaced and/or the property owner will be compensated in accordance with the Federal Uniform Relocation Assistance and Real Property Acquisition Policies Act.

4. *Regarding the loss of on-street parking on Halekauwila Street, as stated in Final EIS section 3.4.4, a parking usage survey was conducted in April 2009 along Halekauwila Street. This survey examined current usage of on-street parking in this location. The results of this study, which are summarized in Table 3-24 of the Final EIS, revealed that most on-street spaces between Punchbowl Street and Cooke Street were lightly to moderately used during the week day (approximately 25 to 75 percent of spaces were full) while over 75 percent of spaces were full between Cooke Street and Kamani Street.. This survey also found that alternative parking was generally available within one block of the parking spaces to be removed, and as a result, it is not expected that transit riders would park in the commercial parking lots in this area. As a result, these on-street spaces will generally not be replaced.*

5. *Regarding the loss of off-street parking along Dillingham Boulevard, as stated in Section 3.4.7 of the Final EIS, properties related to effected private, off-street parking spaces will be acquired for the Project as part of right-of-way needed along the length of the corridor. Compensation will be in accordance with the requirements of the Federal Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970. The City does not plan to generally replace all of the private, off-street parking purchased and removed for construction of the Project; however as stated above, the Project will help reduce the need for such parking. Where landscaping, sidewalks, and driveway access will be affected by the Project, coordination will occur with the landowner, and these property features will be replaced and/or the property owner will be compensated in accordance with the Federal Uniform Relocation Assistance and Real Property Acquisition Policies Act.*

6. *The project design has been revised since the Draft EIS and as a result, there will not be a loss of parking on Halekauwila Street between Keawe Street and Coral Street.*

B. Mitigation Measures for Parking

Response to Comment #4 regarding parking mitigation

1. *Based on comments received on the Draft EIS, additional parking surveys have been conducted since the Draft EIS was released. As stated in the response to*

Comment #3 (above), these parking surveys revealed that there is parking available within one block of the parking spaces to be removed. As a result, on-street parking spaces will generally not be replaced. The City is committed to conducting spillover parking surveys before construction of the station and again after the station is opened. Results of the surveys will be used to determine the appropriate mitigation strategies.

2. *The Final EIS includes a table showing mode of access (walk/bike, bus, kiss-and-ride, and parking) to each transit station (Table 3-20). Additionally, Table 3-22 in the Final EIS shows parking demand at each station. Table 3-20 shows that 90 percent of transit riders will access fixed guideway stations by walking, biking, and the bus. Parking demand is expected to be minimal overall. Spillover parking surveys will be conducted at each station before construction begins and again after the station is opened to determine actual spillover effects. As stated in Chapter 3, Section 3.4.4, the actual extent of spillover parking near stations will be influenced by a variety of factors, including changing conditions between now and the time the station is opened as well as future development. As a result, parking surveys conducted before and after station opening is the most appropriate way to gauge actual effects directly attributable to the station.*

3. *The travel demand forecasting model identified stations with high drive to transit access. Park and ride facilities are being built at four stations (East Kapolei, UH West Oahu, Pearl Highlands, and Aloha Stadium) based on these modeling results. The City does not plan to construct any parking facilities at the other fixed guideway stations.*

4. *Thank you for your suggestion regarding public assistance toward building parking structures. The City recognizes that good parking management is important to the success of the Project and to station areas in particular. As part of the Project, the City will provide a total of 4,100 parking spaces at four stations, including structured parking for 1,600 cars at the Pearl Highlands station. In addition, as part of a different project, the City is planning to build a 1,000 space parking garage near the Middle Street Transit Center station. At this time, the City does not plan to participate in the construction of other parking structures near stations.*

5. *Regarding your suggestion for a signage and parking permit program, the City understands that providing proper signage and real-time information is crucial for the construction phase and during operation of the system. As stated in Section 3.5.7 of the Final EIS, where existing parking is disrupted by construction, signs will be posted directing people to nearby locations with available parking. The public will be kept aware of upcoming work locations and information will be available on the project website about parking disruptions and alternatives. The City will coordinate with property and business owners regarding the timing of construction and other issues to minimize disruptions to off-street parking. A permit parking program will be considered among other strategies by the City to mitigate the effects of spillover parking near transit stations.*

III. Effects of Completed System on Businesses along Rail line and at Transit Stations

A. Physical Effects

1. Traffic, Visibility, and Access to Businesses

Response to Comment #5 regarding visibility and access to businesses

a. Visibility

The assessment of visual effects discussed in Section 4.8 of the Final EIS considers businesses, which include owners, customers, and employees, as important viewer groups. Each viewer group's characteristics were considered in the visual quality assessment for the viewpoints analyzed in Section 4.8 of the Final EIS. For example, the visibility for motorists along Dillingham Boulevard is illustrated on Figure 4-29 (Viewpoint 10) in the Final EIS. The simulated view shows that the overhead guideway will not block views of businesses or signage. The guideway support columns will be spaced at about 150 foot intervals, and views of businesses will not be greatly reduced. The overall visual effect in this area, as noted in Table 4-9, will be moderate.

More detail on the consideration of viewer response in this analysis can be found in the Honolulu High-Capacity Transit Corridor Project Visual and Aesthetic Resources Technical Report (RTD 2008e). Please refer to the following tables in that report:

- *Table 4-1: Landscape Unit 1 Viewpoints – Existing Visual Quality and Viewer Groups (this Landscape Unit corresponds to the East Kapolei to Fort Weaver Road Landscape Unit in the Draft EIS).*
- *Table 4-2: Landscape Unit 2 Viewpoints – Existing Visual Quality and Viewer Groups (this Landscape Unit corresponds to the Fort Weaver Road to Aloha Stadium Landscape Unit in the Draft EIS).*
- *Table 4-3: Landscape Unit 3 Viewpoints – Existing Visual Quality and Viewer Groups (this Landscape Unit corresponds to the Aloha Stadium to Kalihi Landscape Unit in the Draft EIS).*
- *Table 4-4: Landscape Unit 4 Viewpoints – Existing Visual Quality and Viewer Groups (this Landscape Unit corresponds to the Kalihi to Ala Moana Landscape Unit in the Draft EIS).*

b. Access

Access to all businesses located near the Project will be maintained. Traffic conditions will operate at acceptable levels-of-service except for four station areas: East Kapolei, UH West Oahu, Pearl Highlands, and Ala Moana Center. As shown in Table 3-23 of the Final EIS, park-and-ride, passenger drop-offs, and feeder buses will affect traffic at six intersections near these stations; however, measures included with the Project will mitigate these effects. These measures include traffic signalization and adding roadway lanes. Mitigation measures are discussed in Section 3.4.7 of the Final EIS. As stated in response to Comment #3 (above) parking is generally available within one block of the parking spaces that will be lost due to construction of the Project. As a result, the City does not generally plan to replace lost on-street parking.

c. Narrower Lanes

As indicated in Section 3.4.3 of the Final EIS, the guideway placements will not affect overall traffic operations in terms of the number of travel lanes available to motorists. Although the width of some lanes will be narrowed by the Project, they will comply with the American Association of State Highway and Transportation Officials (AASHTO) recommended minimum standards for urban roadways. During Final Design, the relationship of travel lanes, shoulders, sidewalks, and horizontal clearances to obstructions such as columns will be considered together in determining the final widths of each item. Some lane widths could be increased from what is shown in Table 3-21. Permits for construction will not be approved unless a roadway is safe and acceptable to the responsible transportation agency. Lane widths along all roadways, including those roadways referenced in your comment, will meet AASHTO and the Hawaii Department of Transportation (HDOT) standards and will not be a hazard for larger trucks. In addition, no sidewalks will be permanently closed as a result of the Project, as shown in Table 3-25 of the Final EIS.

d. Mitigation

The City commits to the following measures to mitigate effects from the Project:

(a) With regard to parking-related mitigation, as noted in Section 3.4.7 of the Final EIS, station areas with the highest estimated demands for spillover parking are at West Loch, Pearlridge, Iwilei, and Ala Moana Center. Spillover parking surveys will be conducted around each station before and after construction to determine any effects from spillover parking and mitigate as appropriate. Mitigation could range from parking restrictions or regulation, permit parking or shared

parking, or other measures as noted in Section 3.4.7 of the Final EIS. Section 3.4.4 of the Final EIS states that in locations where parking will be removed by the Project, other parking capacity generally exists nearby to accommodate demand. The cumulative and indirect effect of removing parking spaces to accommodate the Project will be that some people who parked in those spaces will either use another space nearby, will choose another mode to reach their destination, or may not make the trip at all. The indirect effect of spillover parking around stations will increase demand for existing parking spaces.

(b) *With regard to access to and from businesses, Section 4.18.1 of the Final EIS states that, "access to businesses near construction activities could be temporarily affected but will be maintained." In addition Section 4.18.1 states, "to the extent practicable, [the Project will] coordinate the timing of temporary facility closures to minimize impacts to business activities—especially those related to seasonal or high sales periods" and "minimize, as practical, the duration of modified or lost access to businesses."*

(c) *With regard to traffic circulation, Section 3.4.7 of the Final EIS identifies strategies that will mitigate potential effects associated with the Project. With mitigation strategies, traffic conditions in the East Kapolei, UH West Oahu, Pearl Highlands, and Ala Moana Center station areas will operate in a satisfactory manner.*

(d) *As stated previously, lane widths along all roadways will meet AASHTO and the HDOT standards. As a result, it is not anticipated that there will be an increase in traffic accidents. Further, as stated in Section 3.6.1, the Project will result in a reduction in vehicle miles traveled, which could reduce traffic accidents. Additionally, as stated in Section 2.5.4 of the Final EIS, operation in exclusive right-of-way eliminates the potential for accidents between automobiles and fixed-guideway transit vehicles. Because pedestrians will not be allowed to cross the tracks, the potential for pedestrian accidents is virtually eliminated.*

(e) *The Project will be elevated over roadway. For motorists, passengers and pedestrians traveling on the roadways where the guideway will be overhead, views of businesses will not be affected.*

Regarding your suggestions for traffic signals and elongated turning lanes mentioned under part d. mitigation, as detailed in Section 3.4.7 of the Final EIS, mitigation measures at the six intersections effected by the Project include widening of intersections to provide turn lanes and installing of new traffic signals and coordinating these signals with adjacent signals. Additionally, the City will restripe the section of H-2 Freeway near Kamehameha Highway to provide a parallel merge lane. Addendum 2 provides information on the additional traffic studies that have been conducted for the Project.

2. Noise and Vibration

Response to Comment #6 regarding noise and vibrations

The Project's noise analysis was prepared in accordance with FTA's Transit Noise and Vibration Impact Assessment Manual (2006). The analysis accounts for additional nighttime noise sensitivity by evaluating Ldn noise levels, which include a penalty for noise generated at night. Noise impacts to noise sensitive uses, including commercial areas, were evaluated according to FTA policy. Section 4.10.1 of the Final EIS describes the various noise measurement locations, including the lanais of upper floors of residential buildings. Noise levels at higher-level floors were measured and analyzed as a result of comments received on the Draft EIS and are shown in Section 4.10.3 of the Final EIS. The results show only moderate noise impacts to one residential building between the proposed Civic Center and Kakaako Stations. With mitigation that has been committed to in the Final EIS (wheel skirts and use of sound absorptive materials), there are no noise impacts along the corridor as a result of the Project. For the building at 860 Halekauwila Street, sound absorptive material will be required from 200 feet Ewa of Kamani Street to 100 feet Koko Head of Kamani Street—a total of 300 feet. Future buildings above the guideway at similar distances from the guideway can be expected to be exposed to comparable moderate noise levels.

3. Security

Response to Comment #7 regarding security

The majority of the system will be located in existing roadway medians, which is not conducive to being used as a shelter. Stations will be patrolled by police, transit staff, and/or private security and will be closed at night when the system is not in operation (between midnight and 4:00 a.m.). Additionally, as stated in Section 2.5.4, of the Final EIS, security cameras that are monitored at all times of operation, audible and visual messaging systems, and an intercom link to the system operations center will also be included at all stations, park-and-ride facilities, and vehicles. The system will also include park-and-ride facilities with security and lighting. The City is working with the Honolulu Police Department to develop the system's safety and security program. As discussed

in this section, security measures will include Crime Prevention through Environmental Design (CPTED) principles, which is a theory that proper design and effective use of the built and natural environments can reduce the fear and incidence of crime as well as improve the quality of life. CPTED measures ensures that spaces are visible, open, well-lit and observable to minimize crime and will be incorporated at all stations. The City will provide maintenance to the guideway and transit facilities.

In addition, the City is conducting workshops with communities that will have rail stations. The purpose of the workshops is to engage the public about rail stations and provide opportunities to residents and businesses to contribute ideas about the appearance of station entryways in the surrounding areas. Ideas generated at the workshops will be incorporated into the station design process. Please plan to attend the workshops and advance the measures listed in your comment during this process. For more information and to get involved in this process, please visit the project website at www.honolulutransit.org.

4. Visual and Aesthetic Effects

Response to Comment #8 regarding visual and aesthetic effects

The following comments are in response to Comment #8 in your letter, Letters A-D.

Throughout the Draft EIS review and comment period, many commented that visual changes associated with the project's elements will result in substantial visual effects. Many comments received expressed concern that the elevated fixed guideway transit system will adversely affect Oahu's unique visual character by creating blight and degrading views. In addition, commenters, including Kamehameha Schools, requested more information on how the project elements will be integrated with their communities, especially in the areas around stations.

These comments on view effects are representative of the various viewer groups (including businesses) that have been considered in the visual and aesthetic conditions analysis presented in the Draft EIS and the Final EIS. The definition and description of viewer groups is provided in Section 3.1.4 of the Honolulu High-capacity Transit Corridor Project Visual and Aesthetic Resources Technical Report (RTD 2008). The following is an explanation of the terms "viewer exposure" and "sensitivity." Viewer exposure refers to the view groups' physical location, the relative number of people exposed to the view, and the duration of their view. This includes transit and highway users and people in the surrounding area. Viewer sensitivity refers to a group's expectations relative to a particular visual setting in a particular area. It is also the extent to which visual elements are important to the viewer group. Viewer sensitivity is affected by a variety of factors, including the activities a viewer in engaged in; the visual context; and their values, expectations, and interests. The assessment of visual

effects in Section 4.8 of the Final EIS has considered that each viewer group, including business owners, customers, and employees, are important (see "Viewer Groups," in Section 4.8.2 of the Final EIS). The methodology for the visual assessment is detailed in Section 4.8.1 of the Final EIS. In addition, each viewer group's characteristics were considered in the assessment of visual effects for each of the viewpoints described in Table 4-9 in Section 4.8 of the Final EIS. The effects, which are noted as low, moderate, or significant, also consider each viewer group's location, duration, and distance.

In response to the viewer groups' responses, received during the Draft EIS comment period, several key views have been reevaluated and the Final EIS has been refined (see section 4.8 of the Final EIS). The overall conclusions of the Draft EIS have not changed. The analysis of protected views and vistas was provided in earlier technical documents; however, the Final EIS more clearly describes the visual effects on these resources.

The island's unique visual character and scenic beauty were considered in the visual and aesthetic analysis presented in the Draft and Final EISs. As discussed in Section 4.8 of the Final EIS, the Project will be set in an urban context where visual change is expected and differences in scales of structures are typical. The Final EIS acknowledges that the Project will have shadow, light, and glare effects Mitigation is listed in 4.8.3. Effects on property values are discussed in Section 4.19.2 of the Final EIS. Property values in the vicinity of rail systems tend to increase, including in the vicinity of rapid rail systems with elevated sections (see Table 4-38 and Section 4.19.2 of Final EIS).

As discussed in Section 4.8.2 of the Final EIS major viewer groups within the project corridor include residents, commuters, business owners, recreationists, and visitors. Residents are people who observe the visual environment daily and for extended periods. Commuters are those who frequently travel through an area and, therefore, are familiar with the existing visual environment. However, this group may not have the same sense of ownership as residential viewer groups because they do not reside within that environment but only pass through it. Business owners have a vested interest in the visual environment surrounding their operations. Most business owners are familiar with their surrounding environment and may have a sense of ownership. Recreationists include people who frequent local parks, hiking trails, bikeways, and watercourses. They have definite expectations about the visual environment's condition. Visitors consist of both first-time and repeat visitors to the area. Visitors may consist of tourists, delivery or service personnel, or business employees and customers. This viewer group is less familiar with the existing visual environment's specific details, but they tend to have some sensitivity to and expectation of the surrounding environment. DPP and other interested groups (e.g. the Outdoor Circle, Scenic Hawaii Inc., the Honolulu Chapter of the American Institute of Architects) also provided data or input regarding the visual impact assessment for the Project. The major components of the visual impact assessment are described in 4.8.1 of the Final EIS. The U.S.

Department of Transportation methodology does not prescribe the development of 360-degree visuals for multiple cross sections of the rail line. The methodology as described in the Final EIS provides the information required to determine visual impact of the Project.

The Honolulu High-Capacity Transit Corridor Project Visual and Aesthetics Resources Technical Report discusses the methodology for the visual impact assessment. This assessment includes views from representative viewpoints. Selection of these viewpoints was limited to readily accessible public areas such as parks, sidewalks, streets, and parking lots. A greater emphasis was placed on identifying views toward the Project, because this best represents most viewers and the greater variety of views that would be experienced.

The visual simulations are intended to accurately represent the structure's scale in relation to other objects. However, they do not reproduce the entire field of view that individuals would perceive. Photographs typically produce a static field of view, but an individual's eyes constantly scan and selectively focus on a scene for content. As a result, photographs often do not show scenic features as prominently as they might appear to individual observers.

The visual simulations are intended to represent the scale and spatial relationships of project elements to other objects. Some of the simulations are also intended to represent view corridors identified as protected resources in pertinent policy documents. These simulations serve several purposes: they were used to evaluate visual and aesthetic consequences, demonstrate the potential for mitigation, and provide a means of communicating the findings of the analysis.

In addition, the Project will provide users, including tourists, with expansive views from several portions of the corridor by elevating riders above highway traffic, street trees, and low structures adjacent to the alignment. Section 4.8.3 of the Final EIS contains specific environmental, architectural, and landscape design criteria that will help minimize visual effects of the Project. Design criteria will govern all new utility construction outside of buildings, as well as the maintenance, relocation, and restoration of utilities encountered or affected by construction of the fixed guideway.

The assessment of visual effect from the Project as described in Section 4.8.3 of the Final EIS considers the existing development along the project alignment. Within the Project corridor the environment changes from rural in the Waianae end of the corridor to dense high-rise development at the Koko Head end.

As part of the design process, DTS has developed specifications and design criteria to address the City's requirements for the Project that will be implemented as mitigation measures to minimize visual effects. Guideway materials and surface textures will be selected in accordance with generally accepted architectural principles to achieve effected integration between the

guideway and its surrounding environment. Landscape and streetscape improvements will mitigate potential visual impacts, primarily for street-level views.

Other measures to address visual impacts of the Project are being developed through the station design and planning process. The initial station area plans and design guidelines were first developed with coordination between DTS and DPP. The next level of transit station design focuses on integrating individual neighborhood characteristics of the communities served by stations.

The following mitigation framework will be included with the Project to minimize negative visual effects and enhance the visual and aesthetic opportunities that it creates:

- *Develop and apply design guidelines that will establish a consistent design framework for the Project with consideration of local context.*
- *Coordinate the project design with City TOD planning and DPP.*
- *Consult with the communities surrounding each station for input on station design elements.*
- *Consider specific sites for landscaping and trees during the final design phase when plans for new plantings will be prepared by a landscape architect. Landscape and streetscape improvements will serve to mitigate potential visual impacts.*

Utility relocations are discussed in Section 4.5.3 of the Final EIS. The Project will relocate utilities where required, and the City will coordinate with adjacent property owners and utility companies prior to relocation and during relocation. Utility relocations will be designed to be compatible with the community setting as feasible. Details about utility relocations are discussed in Section 4.18.2 of the Final EIS.

B. Economic Effects

1. Business Effects

Response to Comment # 9 regarding economic effects on businesses

The Project is the construction and implementation of rail transit service, which is discussed in the Draft and Final EISs. As discussed in Section 4.19.2 of the Final EIS, TOD is expected to occur in station areas as an indirect effect of the Project. Based on experiences with systems in other places with all types of rail systems (i.e., elevated, at-grade, and underground), it is the increased

mobility and accessibility afforded by the Project that will increase the desirability and value of land near stations and attract new real estate investment nearby (in the form of TOD). Planning and zoning around station areas will be established and conducted by the DPP under a process covered by the City's new TOD Ordinance 09-4. For properties outside the boundaries of TOD station locations, these requested studies are beyond the scope of the Project and the EIS.

As noted earlier, an additional independent study is not planned.

2. Redevelopment

Response to Comment #10 regarding redevelopment options

To accomplish the economic development objectives for Oahu's urban corridor, suitable infrastructure must be developed as described in Section 4.3 of the Final EIS. The Project is supportive of the land use and transportation elements of plans, policies, and controls within the study corridor as documented in Appendix J of the Final EIS.

Section 4.5.3 of the Final EIS discusses the potential new development and redevelopment along the project alignment, as well as the scale of the transit system itself, may affect the character of development along the alignment. \This section includes a discussion of the Project's effects on individual neighborhoods along the corridor.

IV. Cost and Financial Analysis

Response to Comment #11 regarding financial feasibility

a. *The capital plan for the Project is presented in Section 6.3 of the Final EIS, which includes a description of the amount of funding anticipated from various sources. The capital plan takes the current economic downturn into account.*

b. *Section 6.6 discusses the risks and uncertainties associated with the financial analysis prepared for the Project, including risks related to changes in project scope. If the Project is over budget, other sources of revenue have been identified in 6.3.3 and 6.6.3 and could include private funds (i.e., contributions toward the cost of building stations) or airport funds; however, $1.3 billion in year-of-expenditure dollars is included in the project budget as contingency for just such eventualities.*

c. *The State's announcement of a series of projects for construction as a result of a Federal stimulus program are already included in the No Build Alternative and are shown in Table 2-4 of the Final EIS. All the major stimulus projects are identified in the OahuMPO's Regional Transportation Plan and were also part of the No Build Alternative in the Draft and Final EISs against which all the Build Alternatives were compared.*

d. *Chapter 6 of the Final EIS describes the financial resources expected to be needed to pay for the capital costs of the Project and for ongoing operating and maintenance costs. Capital costs of the Project, including finance charges, are expected to be fully paid for by a combination of FTA Section 5309 New Starts and FTA Section 5307 Funds from the Federal government and revenues from the General Excise and Use Tax (GET) surcharge levied from 2007 through 2022. Additionally, $1.3 billion in year-of-expenditure dollars is included in the project budget as contingency in the event of cost overruns.*

The financial plan will be updated periodically as conditions warrant and as the Project moves ahead. This is a requirement of the Federal New Starts process and is intended to ensure the Project continues to be financially feasible and to avoid the types of problems encountered on other projects.

V. Effects of Land Acquisitions

Response to Comment #12 regarding land acquisition and mitigation

1. Individual assessments will be performed by the Project's Right-of-Way Team as the design progresses. Right-of-way plans are shown in Appendix C of the Final EIS. These maps show full and partial acquisitions and individual properties can be identified by tax map parcel numbers. As discussed in Section 4.4.3 of the Final EIS, where relocations will occur, compensation will be provided to affected property owners, businesses, or residents in compliance with all applicable Federal and State laws and will follow the Federal Uniform Relocation Assistance and Real Property Acquisition Policies Act (49 CFR 24). The following measures will be implemented for relocations:

- *The City will assist all affected persons in locating suitable replacement housing and business sites within an individual's or business's financial means. A minimum 90 day written notice will be provided before any business or resident will be required to move.*
- *Relocation services will be provided to all affected business and residential property owners and tenants without discrimination; persons, businesses, or organizations that are displaced as a result of the Project will be treated fairly and equitably.*
- *Where landscaping, sidewalks, and driveway access will be affected by the Project, coordination will occur with the landowner, and these property features will be replaced and/or the property owner will be compensated in accordance with the Federal Uniform Relocation Assistance and Real Property Acquisition Policies Act.*

2. All acquisitions will follow the requirements of the Federal Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970. The City will work with land owners if non-conformities occur as a result of acquisitions.

(3. Please note, there is no #3 comment in your original letter).

4. All acquisitions will follow the requirements of the Federal Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970. The City will work with land owners if non-conformities occur as a result of acquisitions

5. If payment is delayed more than 30 days after the final judgment, additional interest at the rate of 5 percent shall be added to the final judgment (Section 100-25, Hawaii Revised Statutes). For a Federal-aid project, the cost of this interest payment is not eligible for Federal reimbursement.

6 – 8. The City recognizes property owner's specific needs and will have a Right-of-Way Team dedicated to this Project. Specific details will be worked out with individual property owners.

VI. Kelo Concerns

Response to Comment # 13 regarding private property

The Project evaluated in the Draft and Final EISs concerns the construction and implementation of rail transit service. However, as discussed in Section 4.19.2 of the Final EIS, TOD is expected to occur in station areas as an indirect effect of the Project. Planning around stations is currently underway by DPP under a process covered by the City's new TOD Ordinance 09-4. The TOD ordinance, and subsequent TOD plans, are designed to encourage private investment in the vicinity of the stations, as appropriate. DPP has encouraged community involvement in the development of those plans. As for the Project, the City will acquire only properties needed to build the Project, which includes about 200 full and partial acquisitions, mostly strip acquisitions along roadways (Section 4.4.3 of the Final EIS). All acquisitions and relocations will comply with the Federal Uniform Relocation Assistance and Real Property Acquisitions Policies Act.

VII. TODs As Potential Mitigation

Response to Comment #14 regarding TOD

The following paragraphs are in response to Comment #14, Letters A, B1 and B2A-C in your comment letter.

a. The City has adopted plans that direct future development to occur within the study corridor and away from less developed portions of Oahu. The TOD policy will focus the growth into patterns that will increase the viability of a number of travel options available to corridor residents and employees, including transit, walking, and bicycling. TOD special districts will restrict development in agricultural and open-space areas and encourage mixed-use, high-density, walkable communities around transit stations. The special districts also encourage public input into the design of TOD neighborhood plans to reflect unique community identities. TOD planning is underway and will occur before the fixed guideway stations are constructed. The City passed this TOD ordinance in March 2009 in anticipation of the Project. Development in the study corridor, whether highway-oriented or TOD, will be based on market demands. Pursuant to the policy, TOD may occur in project station areas as an indirect effect of the

Project. The increased mobility and accessibility that the Project will provide may also increase the desirability and value of land near the stations, attracting new real estate investment nearby. See Section 4.19.2 of the Final EIS for additional information regarding TOD development.

b. The NEPA and Hawai'i Revised Statutes Chapter 343 require the evaluation of potential effects of proposed government actions on the environment. Land use impacts, including potential TOD development, are critical criteria for FTA in ranking projects for Federal funding. Potential TOD development is addressed in Section 4.18 of the Draft EIS. This section was updated in the Final EIS Section 4.19 to reflect Ordinance 09-4. Evaluation of TOD projects in other cities with new rail projects is beyond the scope of this EIS.

c. DPP is working with the community to develop TOD plans. DTS, the lead agency for the Project, is not responsible for planning. However, the Project is supportive of this planning effort.

VIII. Study of the North King Street Alignment

Response to Comment #15 regarding a North King Street alignment

The North King Street alignment was evaluated in the Alternatives Analysis (November 2006). This alignment would have effected a greater number of parcels located within environmental justice/communities of concern areas (29 parcels of which 2 are residential versus 23 parcels of which 0 are residential along Dillingham Boulevard). In addition, a North King Street alignment would have moderate-high visual impacts whereas the Dillingham Boulevard alignment would have low-moderate visual impacts. The noise analysis conducted revealed moderate impacts at 52 receivers along the North King Street alignment whereas there would be moderate impacts at 17 receivers along Dillingham Boulevard.

There are 43 cultural practices and resources along the North King Street alignment that would be affected during construction and 2 that would be affected during operation. With the Dillingham Boulevard alignment, 23 cultural practices would be affected during construction and 0 would be affected during operation (cultural practices varied from one-time annual events to churches or community organizations where cultural activities are regularly held). The historic analysis identified pre-1965 tax map lots within the study corridor. Locations on this list included resources reviewed in previous studies and/or already included in the State Historic Preservation Division's State and National Register lists. The North King Street alignment is adjacent to 33 historic resources (of which 5 are on either the Hawaii Register or Eligible for the National Register) whereas the Dillingham Boulevard alignment is adjacent to 12 potentially historic resources (of which only 1 is on one of the registers).

The North King Street alignment would have required a longer and less efficient route and would have increased the system's cost by $50 million. While the North King Street alignment would serve more residents, Table 3-3 in the Alternatives Analysis Report shows that the fixed guideway route via North King Street had fewer overall riders than the route along Dillingham Boulevard. As a result of these reasons, the North King Street alignment was rejected as an alternative and thus not studied as part of the EIS. This information is provided

in the Alternatives Analysis and technical reports prepared for the Alternatives Analysis. The North King Street alignment will not be reexamined as part of the Final EIS. The Nimitz flyover project was included in the modeling conducted for both the No Build and Build Alternatives studied in the Alternatives Analysis and EIS.

IX. Evaluation of An At-Grade or Multi-Modal System in the Urban Core

Response to Comment #16 regarding an at-grade or multimodal transit system

As stated in Section 2.2 of the Final EIS, prior to selecting an elevated fixed guideway system, a variety of high-capacity transit options were evaluated during the Primary Corridor Transportation Project (1998—2002) and Alternatives Analysis. Options evaluated and rejected included an exclusively at-grade fixed guideway system using light rail or bus rapid transit (BRT) vehicles, as well as a mix of options consisting of both at-grade and grade-separated segments. These alternatives were rejected because they did not meet the Purpose and Need of the Project. The text below explains further reasons why an at-grade system was rejected.

The Alternatives Screening Memorandum (DTS 2006a) recognized the visually sensitive areas in Kakaako and Downtown Honolulu, including the Chinatown, Hawaii Capital, and Thomas Square/Academy of Arts Special Design Districts. To minimize impacts on historic resources, visual aesthetics, and surface traffic, the screening process considered 15 combinations of tunnel, at-grade, or elevated alignments between Iwilei and Ward Avenue. Five different alignments through Downtown Honolulu were advanced for further analysis in the Alternatives Analysis, including an at-grade portion along Hotel Street, a tunnel under King Street, and elevated guideways along Nimitz Highway and Queen Street.

The Alternatives Analysis Report (DTS 2006b) evaluated the alignment alternatives based on transportation and overall benefits, environmental and social impacts, and cost considerations. The report found that an at-grade alignment along Hotel Street would require the acquisition of more parcels and could potentially affect more burial sites than any of the other alternatives considered. The alignment with at-grade operation Downtown and a tunnel under King Street, in addition to the environmental effects such as impacts to cultural resources, reduction of street capacity, and property acquisition requirements of the at-grade and tunnel sections, would cost approximately $300 million.

The Project's purpose is "to provide high-capacity rapid transit" in the congested east-west travel corridor (see Section 1.7 of the Final EIS). The need for the Project includes improving corridor mobility and reliability. The at-grade alignment would not meet the Project's Purpose and Need because it could not satisfy the mobility and reliability objectives of the Project (see bullets below). Some of the technical considerations associated with an at-grade versus elevated alignment through Downtown Honolulu include the following:

- ***System Capacity, Speed, and Reliability:*** *The short, 200-foot (or less) blocks in Downtown Honolulu would permanently limit the system to two-car trains to prevent stopped trains from blocking vehicular traffic on cross-streets. Under ideal operational circumstances, the capacity of an at-grade system could reach 4,000 passengers per hour per direction, assuming optimistic five minute*

headways. Based on travel forecasts, the Project should support approximately 8,000 passengers in the peak hour by 2030. Moreover, the Project can be readily expanded to carry over 25,000 in each direction by reducing the interval between trains (headway) to 90 seconds during the peak period. To reach a comparable system capacity, speed, and reliability, an at-grade alignment would require a fenced, segregated right-of-way that would eliminate all obstacles to the train's passage, such as vehicular, pedestrian, or bicycle crossings. Even with transit signal priority, the at-grade speeds would be slower and less reliable than an elevated guideway. An at-grade system would travel at slower speeds due to the shorter blocks, tight and short radius curves in places within the constrained and congested Downtown street network, the need to obey traffic regulations (e.g., traffic signals), and potential conflicts with other at-grade activity, including cars, bicyclists, and pedestrians. These effects mean longer travel times and far less reliability than a fully grade-separated system. None of these factors affect an elevated rail system. The elevated rail can travel at its own speed any time of the day regardless of weather, traffic or the need to let cross traffic proceed at intersections.

- ***Mixed-Traffic Conflicts:*** *The Project will run with three minute headways. However, three-minute headways on an at-grade rail system would prevent effective coordination of traffic signals in the delicately balanced signal network in Downtown Honolulu. A three minute cycle of traffic lights would affect traffic flow and capacity of cross-streets. Furthermore, there would be no option to increase the capacity of the rail system by reducing the headway to 90 seconds, which would only exacerbate the signalization problem. An at-grade system would require removal of two or more existing traffic lanes on affected streets. This effect is significant and would exacerbate congestion. Congestion would not be isolated to the streets that cross the at-grade alignment but, instead would spread throughout Downtown. The Final EIS shows that the Project's impact on traffic will be isolated and minimal with elevated rail, and in fact will reduce system-wide traffic delay by 18 percent compared to the No Build Alternative (Table 3-14 in the Final EIS). The elevated guideway will require no removal of existing travel lanes, while providing a reliable travel alternative. When traffic slows, or even stops due to congestion or incidents, the elevated rail transit will continue to operate without delay or interruption.*

  An at-grade light rail system with continuous tracks in-street, would create major impediments to turning movements, many of which would have to be closed to eliminate a crash hazard. Even where turning movements are designed to be accommodated, at-grade systems experience potential collision problems. In addition, mixing at-grade fixed guideway vehicles with cars, bicyclists, and pedestrians presents a much higher potential for conflicts compared to grade-separated conditions. Where pedestrians and automobiles cross the tracks in the street network, particularly in areas of high activity (e.g., station areas or intersections), there is a risk of collisions involving trains that does not exist with an elevated system. There is evidence of crashes between trains and cars and trains and pedestrians on other at-grade systems throughout the country. This

potential would be high in the Chinatown and Downtown neighborhoods, where the number of pedestrians is high and the aging population presents a particular risk.

- ***Construction Impacts:*** *Constructing an at-grade rail system could have more effects than an elevated system in a number of ways. The wider and continuous footprint of an at-grade rail system compared to an elevated rail system (which touches the ground only at discrete column foundations, power substations and station accessways) increases the potential of utility conflicts and discovery of sensitive cultural resources. In addition, the extra roadway lanes taken away for the system would result in increased congestion or require that additional businesses or homes be taken to widen the roadway through Downtown. Additionally, the duration of short-term construction impacts to the community and environment with an at-grade system would be greater than with an elevated system. Because of differing construction techniques, more lanes would need to be continuously closed for at-grade construction and the closures would last longer than with elevated construction. This would result in a greater disruption to business and residential access.*

Because it is not feasible for an at-grade system through Downtown to move passengers rapidly and reliably without significant detrimental effects on other transportation system elements (e.g., the highway and pedestrian systems, safety, reliability, etc.), an at-grade system would have a negative system-wide impact that would reduce ridership throughout the system. The at-grade system would not meet the Project's Purpose and Need and, therefore, does not require additional analysis. As a result of these reasons, an at-grade system was not evaluated as part of the Draft or Final EISs.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

d. Other Mitigation Measures. The *Visual and Aesthetics Resources Technical Report* does identify a number of principles for minimizing, reducing, or mitigating impacts, including those related to construction. See *Visual and Aesthetics Resources Technical Report* at 6-1 to 6-2. KS generally agrees with the stated objectives, but recommends development of specific mitigation actions that will ensure substantive results. The following are the types of specific and measurable mitigation actions that could be included, although a more detailed list should be developed as these measures below would address only a limited number of the expected impacts that will arise: (a) consultation with the communities surrounding each station for input on station design elements; (b) cooperative agreements with adjacent property owners that would improve the Project's visual quality; (c) where practicable, retention of existing street trees along sidewalks and in medians, or plant new vegetation to help soften the visual appearance of project elements (*e.g.*, stations, guideway columns, and TPSSs); and (d) use of source shielding in exterior lighting at stations and ancillary facilities such as the maintenance and storage facility and park-and-ride lots, to ensure that light sources (such as bulbs) would not be directly visible from residences, streets, and highways, and to limit spillover light and glare in residential areas.

B. Economic Impacts

1. Business Impacts

Comment #9: KS requests that the discussion in the DEIS of the economic impacts of the completed system on businesses be expanded through an independent study.

As noted in Section I above, KS requests that the Final EIS incorporate an expanded study of the economic impacts of the Project on businesses conducted by an independent urban economist. In addition to analyzing the impact of construction on businesses, the study should include an assessment of the business impacts of the completed system across a range of property types along the rail line. The analysis should result in quantifiable projections of lost revenue for current and future uses along such systems (both at transit stop locations and between transit stop locations), and business failures, and should be based on case studies of other jurisdictions where an elevated heavy rail technology is chosen rather than a light rail at-grade system. It might also be helpful to analyze the impacts of other rail systems (*e.g.*, at-grade systems) and routes to compare the relative impacts of these alternatives. Once the impacts are identified using these empirical methodologies, the Final EIS should detail mitigation options and how these mitigation options reduce impacts on businesses.

2. Redevelopment

Comment #10: Elevated rail systems affect redevelopment options in the urban core and require additional mitigation measures

An elevated rail system will affect KS' and other landowners' redevelopment plans by limiting the kinds of projects that can be feasibly built on lands adjacent to the rail line. New buildings constructed along the rail line would have to plan around blocked viewplanes, noise emanating directly from trains, and the aesthetics of an elevated line and transit station. To compensate for the low demand for second or third level residential or office space and restricted view planes, buildings would have to be constructed at a minimum height if adjacent to the rail system. This will, of necessity, require greater verticality in future redevelopment, which will have broader community impacts and increase construction costs.

One example of the impact of buildings adjacent to elevated rail lines is the Los Angeles Green Line. A portion of the Green Line runs on an elevated line with several stations near major office buildings and hotel projects. The elevated portion is similar to the Project, except that it is no more than

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25-30 feet above grade, and the concrete Y-beam is only 24-25 feet wide. There are no retail properties along the route. One office building constructed in 1993 at the intersection of Rosecrans Avenue and Aviation Boulevard was located within 40 feet of the building's curtain wall. As a result of the obstructed view and noise, the developer experienced significant difficulty in leasing the office space on the second and third floors of the building's northeast corner. This space was the last to be leased, with the space remaining vacant for three years.

If an elevated system is selected, KS expects that buildings occupied by residents, tenants, or businesses would need to be set back to attenuate the effects of the adjacent rail system. Buildings would also be constructed on platforms above the rail line to compensate for noise, visual, and aesthetic impacts. As a result, construction costs would increase due to the increased height and the use of more expensive materials to provide soundproofing, and the potentially larger building area. These constraints effectively narrow the range of redevelopment options. It could be cost prohibitive, for example, to build relatively affordable residential units on lands fronting the rail line.

KS requests that the Final EIS analyze in greater detail the impacts of an elevated system on redevelopment. Since there are multiple references in the technical reports that future TOD could mitigate some of the negative conditions created by the transit line, we recommend that the Final EIS incorporate input from urban planning professionals, including a working group(s) from the Hawaii Chapter of the American Planning Association, the American Institute of Architects, the Urban Land Institute, or similar organization(s).

In a similar vein, KS recommends that the analysis of Project impacts on property values be revised and expanded to address the points in these comments. The DEIS anticipates that the Project will lead to an increase in property values due to the desirability of access to transit and TOD opportunities. KS' consultant's research indicates that such results may not necessarily be achieved. Further, in situations where desirable value outcomes are achieved, they seemed to have occurred in systems that are not comparable to the Project, such as at-grade designs.

IV. Cost and Financial Analysis

Comment #11: Further study of the financial feasibility of the DEIS is suggested.

As a member of the community, KS has an interest in seeing that the feasibility of an economic undertaking as significant as the Project is thoroughly studied and based upon reliable data. The initial financial projections for the Project reported in Chapter 6 of the DEIS may not have taken into account (a) the recent economic downturn, the duration or severity of which is unknown, (b) potential additional project costs that may be necessary to mitigate impacts of the Project, including those items identified in this letter, (c) the State's recent announcement of major highway improvement projects intended to ease traffic congestion, which may affect ridership projections, and (d) cost overruns beyond the control of the governmental agency, which were experienced by other large-scale projects. In light of, and in evaluating, these types of financial issues, KS respectfully suggests that the City consider alternatives to building an elevated system. As discussed below in Section IX, building an at-grade system through at least portions of the route could be less expensive, may achieve the same transit objectives as an elevated system, and could also eliminate many of the impacts discussed in this letter.

V. Impacts of Land Acquisitions on KS, Its Tenants and Their Businesses

Condemnation or an acquisition by the power of eminent domain of KS' legacy lands, even partial acquisitions, impact KS, its tenants, and their businesses. More information on what areas and

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interests will be acquired, when they will occur, and what interests will be compensated for would be helpful to KS and its tenants.

Comment #12: KS requests more specific information on what will be acquired by the City and the impact of such acquisitions and compensation to be provided. Such information should assist KS and its tenants in evaluating how the acquisitions will affect their businesses.

1. **Additional Information.** The DEIS' recognition of the procedures for acquiring and compensating for properties taken and the disclosures to be made are helpful.[8] The *Real Estate Acquisition Management Plan* (RTD 2008q) (the "***RAMP***") is detailed and provides certain procedural protections. However, more specific information on the acquisitions and impacts of such acquisitions would assist KS and its tenants in evaluating how the acquisitions will affect their businesses, such as, (a) information on the size of the area that will be acquired, the size of the remaining area not being acquired[9], and the type of interest to be acquired[10]; and (b) confirmation that KS' and its lessees' buildings and other improvements will not be taken.

2. **Goodwill.** Businesses, especially small businesses operating from a location for many years, may develop valuable goodwill. "Goodwill" has been described as the benefits to a business as a result of its location, reputation for dependability, skill, or quality, and any other circumstances resulting in probable retention of old or acquisition of new patronage. The Model Eminent Domain Code and California's statute (Deering's California Codes Civil Procedure § 1263.510) provide for compensation to a business owner for the loss of goodwill. Neither the DEIS nor the RAMP discusses compensating a business owner for the loss of goodwill resulting from a full or partial acquisition (whether or not required by the Federal Uniform Relocation Assistance and Real Property Acquisition Policies Act (CFR 1989) or other applicable statutory and case law). KS wishes to know whether the City intends to compensate a business owner for the loss of goodwill if the owner has to move because of reasons such as adverse impacts from construction activities, or the operation of the rail line, near the business.

4. **Economic Unit.** On a partial taking, it would seem to make sense to have parcels of land treated as a single parcel of land if they (a) are generally contiguous, (b) are in substantially identical ownership, and (c) are being used, or are reasonably suitable and available for use in the reasonably foreseeable future, for their highest and best use as an integrated economic unit.[11] That way, landowners and businesses are able to receive compensation for the diminution in value of the remainder parcel (the entire parcel excluding the portion acquired by the City) as the result of the Project. Clear guidance in the Final EIS on the treatment of parcels used as an economic unit and compensation for devaluation of the property not taken would assist KS, its tenants, and their business in evaluating whether they will bear a disproportionate burden of the impacts of the Project.

5. **Consequences.** The RAMP discusses the procedures for compensating property owners and businesses affected by full and partial acquisitions, however, KS' tenants and their businesses will be adversely affected if payments are delayed. In any such event, the aggrieved business owner has limited recourse against the City.[12] Consequently, it is suggested that the City consider including in the Final EIS a timetable for the City's compliance with the real estate process outlined in Appendix W and other portions of the RAMP (including the prompt payment of compensation after an agreement is reached) and measures to mitigate such harm caused to landowners and businesses such as a schedule of delay damages payable to the affected parties, interest on the amount due until paid, and reimbursement of reasonable attorneys' and experts' fees incurred by affected parties. In addition, to ensure fair treatment to landowners and businesses when offers of just compensation are made, condemned parties in other jurisdictions are reimbursed their attorneys' and experts' fees if the final offer price by the condemning agency is less than a certain percentage of the final judgment awarded by the court.

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6. **Disclosure of Impacts.** The RAMP does provide for basic negotiation procedures where the agency is to "discuss its offer to purchase the property, including the basis for the offer of just compensation and explain its acquisition policies and procedures, including it[s] payment of incidental expenses in accordance with 49 CFR 24.106." See, § 4.B of App. W of the RAMP. However, it does not expressly require the City to disclose to the property owner or business the impact of the Project on the remainder parcel, including the business thereon, or the date by which payment will be made. It is requested that the basic negotiation procedures specifically include the City's disclosure of the impact of the Project on the remainder parcel, including construction disruptions, temporary and permanent access issues, noise, vibrations, etc., and compensation offered for such adverse impacts; and the date that compensation will be paid (in a pre-established schedule) and the consequences described above if payment is not made as scheduled.

7. **Subdivision.** Although the City is vested with the authority to approve the subdivision and consolidation of parcels of land, it does not usually exercise such authority when condemning property.[13] As such, it is requested that the RAMP (in sections describing closings) provide that on a partial taking, the City create subdivided parcels, including obtaining an order of the Land Court by the filing of the required petition and map, such that the parcel conveyed to the City and the remainder parcel are two separately subdivided parcels. Further, the City should permit the consolidation of a nonconforming (substandard) parcel with any adjoining parcel owned by or subsequently acquired by the condemnee.

8. **Non-conforming parcels.** When KS and its tenants have been left with a non-conforming parcel after acquisition by a governmental authority, they have not been able to obtain necessary building and other permits for renovation and/or redevelopment because of the non-conformity. It is requested that the City consider measures to allow reasonable development of non-conforming parcels created by the Project.

VI. KELO CONCERNS

Comment #13: KS requests assurances that the City will not take private property to give to another private party, whether in the context of a TOD or otherwise.

KS believes that its properties, including its legacy lands, should not be taken through the government's exercise of its eminent domain powers and transferred to a private party for any use. In Kelo v. City of New London, 545 U.S. 469, 125 S.Ct. 2655, 162 L.Ed. 2d 439 (2005), the U.S. Supreme Court narrowly held in a 5 to 4 decision that a city could exercise its eminent domain power by transferring property from one private party to another to promote economic development. However, the U.S. Supreme Court emphasized that nothing in its opinion precluded any state or county from imposing stricter restrictions on its eminent domain power. Many states have already imposed standards stricter than the federal standard by constitutional amendments and legislation.

Any use of the eminent domain power to take KS' property for private development, even if it is in the context of a TOD (transit-oriented development) or TSD (transit-supportive development) would have adverse economic and social impacts on KS. It is requested that the City declare in the Final EIS that the City shall not use its power of eminent domain to take private property and subsequently transfer, by sale or otherwise, the use, ownership, or possession of the condemned property, or any portion thereof, to any person or entity for any economic development or redevelopment or any private use or development, including but not limited to industrial, residential, agricultural, commercial, hotel, resort, office, or retail use or development, whether to raise revenue or otherwise create value to help it meet financial needs for construction or operation of the Project.[14]

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VII. TODs As Potential Mitigants

Comment #14: TOD could be a positive mitigant to the impacts described herein; however, it is premature to rely upon the benefits until a TOD ordinance is adopted and developments are integrated into the Project through planning.

A. Importance of Planning. Studies of other projects indicate that proactive planning efforts to allow high density residential and commercial development near stations are the primary cause of land value appreciation. An example cited for this is the SkyTrain system in Vancouver, where the local governments instituted long term regional planning to create new town centers around elevated transit stations. One such center is the Metrotown, a former light industrial and suburban single family neighborhood, which is reported to be home to over 6 million square feet of commercial and thousands of high rise residential units. Another example cited is the Pleasant Hill BART station area where over 2 million square feet of commercial and 2,300 residential units have been built on a 75-acre site since the mid-1980's. In both cases, rail transit was reported as the key driver behind planning and development efforts.

In contrast, where there is a lack of governmental assistance or coordination, the result may be decades of under utilized properties before any revitalization occurs. Even SkyTrain, as described above, has generated some negative impacts. Many stations have a poor reputation as magnets for crime. Development around elevated stations in the City of Vancouver has been hindered by NIMBYism and poor planning. It is reported that one year after the completion of the Expo line, the Ombudsman of British Columbia released a report addressing some negative impacts of SkyTrain, including noise, a harsh presence, loss of privacy and a depreciated enjoyment of lifestyle, all leading to reduced property values. Although in certain higher-density areas, home prices may increase near a station[15], multiple studies of rail projects show that property values decrease if located near a rail line or even a station.[16] In certain cases, with good planning and governmental assistance, these adverse economic impacts could be partially mitigated. Examining other projects should provide a sound basis for the City to improve upon the experiences of other cities.

B. Integrate Land Use Planning With the Project.

1. Study of other rail systems. To aid the City in identifying best practices in spurring TOD/TSD along the Project route, it is suggested that the City retain an independent urban economist to study other elevated, fixed guideway systems to evaluate and disclose both beneficial and adverse economic impacts on land values, including success stories where governmental assistance prevented or reversed decline. Public comments and input are recommended before the study is finalized.

2. TOD Ordinance. Furthermore, it is essential that the City enact a TOD ordinance. The DEIS has a limited discussion of TODs, but the *Land Use Technical Report* does contain a detailed discussion of land planning and a future TOD ordinance. It was anticipated that the City would develop and adopt a TOD ordinance by 2008. See, DEIS at 4-166. We remain hopeful that a bill will be introduced to the City Council in 2009. A TOD ordinance is appropriate before construction of the Project so that landowners can evaluate whether the ordinance will be an effective mitigant of the various impacts of an elevated system discussed elsewhere in this letter. In developing a TOD ordinance, consideration of the following is recommended:

a. Elements of successful rail projects. A study of rails systems shows that they all resulted in some negative impacts on surrounding properties, at least during construction; however, various aspects of each are also considered models for future TOD. Their success appears to be dependent upon: (i) the commitment of municipalities to employment and density; (ii) healthy real estate

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market conditions; (iii) the interface and integration of rail and real estate concessions with adjoining TOD; (iv) careful phasing; and (v) public-private collaboration and the development of successful partnerships, including the establishment of the appropriate risk and revenue sharing mechanisms.

b. **Evaluation of other transit projects in other states.** Portland is often cited for having a strong planning component. It adopted policies on transit and land use that strongly encouraged TOD and is considered a model for successful development. It is reported that more than $6 billion in development has occurred along MAX lines since the decision to build in 1978. The positive land use impacts of Portland's transit system are due to both the impact of the transit system itself as well as aggressive state, regional, and local policy. Many financial subsidies were also provided to developers to build transit oriented development. While Portland remains, in the eyes of many planners, a strong example of successful transit oriented development, there are many critiques of the city and the impacts of MAX.

c. **Implement sound planning principles.** Studies show that sound planning includes (i) giving priority to development of a TOD ordinance to encourage development along the currently planned route and future transit stations; (ii) working with consultants and landowners to ensure appropriate zoning/land uses around stations; (iii) providing tools to ensure the district receives the intended development lift[17]; (iv) modifying subdivision and land use ordinances to allow non-conforming lots to be consolidated and re-subdivided and to allow issuance of renovation and redevelopment permits for non-conforming lots, both as discussed above; (v) integrating parking into TOD as described above; (vi) planning for and encouraging TODs because they do not automatically occur[18]; including possible real property tax breaks; (vii) developing a specific timetable for the adoption of a TOD ordinance; (viii) seeking and obtaining public input on a bill for a TOD ordinance[19]; (ix) ensuring that the permits to construct the TOD will be issued in a timely manner; and (x) to the extent the TOD ordinance is not adopted in a timely manner, ensuring that permits will be issued for pending developments and not delayed in anticipation of the TOD ordinance.

VIII. STUDY OF NORTH KING STREET ALIGNMENT

During the alternatives analysis phase of the NEPA/HEPA review process, the City considered two alternative alignments for the portion of the fixed guideway traversing through Kalihi and Iwilei, one aligned at North King Street and another at Dillingham Boulevard. The DEIS, however, only discusses the Dillingham Boulevard alignment. It appears that the North King Street alignment may not have been adequately studied before being eliminated as an alternative, and that there are advantages to a North King Street route that warrant it being re-examined.

Comment #15: Further study of the North King Street alignment is recommended

A further evaluation of the North King Street alignment may be warranted. In the initial stages of the environmental review process for the Project, North King Street was considered for the segment of the rail system traversing through Kalihi and Iwilei. The *Alternatives Screening Memo Honolulu High-Capacity Transit Corridor Project* dated October 24, 2006, and prepared by Parsons Brinckerhoff ("*Alternatives Screening Memo*") listed five alignment options for this segment including elevated guideway alignments for North King Street and Dillingham Boulevard. See *Alternatives Screening Memo* at 4-17. By the time the City issued the *Alternatives Analysis Detailed Definition of Alternatives* ("*Detailed Definition*") and *Alternatives Analysis Report* ("*Alternatives Analysis Report*") both dated November 1, 2006, the North King Street and Dillingham Boulevard alignments remained as alternatives for the segment, but the remaining alignments were eliminated. See *Detailed Definition* at 6-16; *Alternatives Analysis Report* at 2-7.

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The *Alternatives Analysis Report* ultimately decided that the Dillingham Boulevard alignment was optimal, and that the alignment was selected for discussion in the DEIS. See *Alternatives Analysis Report* at 6-4. One reason cited was that the Dillingham alignment would require acquisition of fewer residential parcels than the North King Street alignment. The table shows two residential parcels along the North King Street alignment that would be acquired compared to one along the Dillingham alignment. See id. Table 4-1, at 4-2. Unfortunately, neither the residential parcels nor the number of units on the parcels for each alignment is identified in the 2006 *Alternatives Analysis Report* to permit an evaluation of the number of residents who would be displaced under either alignment. However, Appendix B of the DEIS shows that all or portions of three residential parcels (not one as noted in the *Alternatives Analysis Report*) along Dillingham Boulevard are slated for acquisition by the City and the *Neighborhoods and Communities Technical Report Honolulu High-Capacity Transit Corridor Project* (RTD 2008d) dated August 15, 2008, at 5-17 states that along Dillingham "[p]roperty acquisitions would result in 11 residential displacements." Thus, further evaluation would seem to be warranted to determine impacts on residents along both alignments.

The *Alternatives Analysis* states that the North King Street alignment would serve more residents than the Dillingham alignment, but notes that it would serve fewer jobs. As a general matter, serving more residents could lead to an increased ridership of rail because the rail system would be closer to people's homes. Further, the North King alignment is a particularly attractive alternative if the City chooses not to make the stations along the Dillingham alignment more accessible by building parking garages near the stations.

The *Alternatives Analysis Report* also stated that a greater number of potentially historic properties are located along the North King Street alignment. See id. at 4-1. The number of historic properties located along each alignment is not quantified, and the definition of "historic properties" is unclear; it might be that certain properties are "old" but do not have social, cultural, or historic value.

It should also be noted that the Dillingham alignment will require acquisition of three times more the commercial/office parcels (22 parcels) than the North King Street alignment (6 parcels). See id. Building a rail line will exacerbate already difficult economic conditions for Dillingham businesses.

The *Alternatives Analysis Report* states that the Dillingham alignment would result in fewer noise impacts. See id. at 6-4. The basis for the conclusion is not available in the report yet should be for such an important consideration.

Finally, the State recently announced its plans for a "flyover," an elevated two-lane roadway over Nimitz Highway, which "would run from the Ke'ehi interchange to Pacific Street, zipping commuters through Kalihi with no way to get off until its end." Mary Vorsino, "Hawaii Set for Years of Roadwork in 'Huge' $4B Highway Plan – 6-year effort includes Nimitz 'flyover,' better bike access," *Honolulu Advertiser*, Feb. 4, 2009. The impacts of the two proposed elevated structures over the parallel traffic corridors of Nimitz Highway and Dillingham Boulevard should be considered in evaluating a North King alignment.

One of the primary reasons given for choosing the Dillingham alignment is that it is projected to experience the highest transit ridership, which includes ridership on various modes of transportation (*e.g.*, busses). See id. at 3-6, 6-4. However, according to data reported in the DEIS, the North King alignment is forecasted to make 128,500 daily trips on the *fixed guideway system* as opposed to 123,700 daily trips for the Dillingham alignment. See id. Thus, for purposes of comparing two fixed guideway alignments, the North King Street alignment actually would attract more use. Moreover, the North King Street alignment is forecasted to experience twice the number of daily boardings than the Dillingham

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alignment—*i.e.*, 10,860 daily boardings for the three stations along the North King alignment[20] versus 5,370 daily boardings for the two stations along the Dillingham alignment.[21]

For these reasons, KS requests that the Final EIS include the North King Street alignment as an alternative.

IX. Evaluation of an At-Grade or Multi-Modal System in the Urban Core

Comment #16: An at-grade or multi-modal transit system in the urban core is an alternative worth evaluating to determine whether it is a less expensive and quicker to construct than an elevated system.

KS is supportive of a fixed guideway transit system.[22] The fixed guideway alternatives discussed in the DEIS utilize an elevated rail system and vary only in terms of alignment. See DEIS at S-4. None of the alternatives discussed in the DEIS appears to utilize at-grade technology for any segment of the alignment. While it is understandable why an elevated system might be utilized in rural areas of the transportation corridor, as discussed elsewhere in this comment letter, a host of adverse economic and environmental impacts are associated with an elevated guideway system, including noise, reduced visibility and access to businesses, visual blight, and increased crime. Such impacts will be greatest in the urban core where businesses and commercial land holdings are concentrated, including those of KS. For these reasons, it makes sense to consider an alternative to an elevated system at least within the urban core. KS believes that an at-grade system running from the perimeter of the urban core is a viable alternative to an elevated system based on cost, visibility impacts, urban aesthetics, construction impacts, and time to construct.

It is KS' understanding that the City did not formally reject an at-grade system as an alternative during the alternatives analysis.[23] Because the issue of whether the rail system should run on an elevated line instead of at-grade was never squarely raised during the alternatives analysis process, KS did not previously have the opportunity to comment on the relative merits of an at-grade versus elevated system.

It does not appear that the at-grade alternatives were adequately studied before being eliminated from consideration in the DEIS. Although at-grade alternatives were considered during the alternatives screening process, the reasons why they were not carried through to the DEIS is not explained. In fact, the *Alternatives Screening Memo* left open the option of constructing certain portions of a fixed guideway system at-grade. See, e.g., Screening Memo at 4-1, 4-4. For example, at-grade options were contemplated for the portion of the route from Leeward Community College to Aloha Stadium and from Aloha Stadium to Ke'ehi Interchange (Section 4). See id. at 4-10 to 4-17. The *Detailed Definition* did not discuss whether the fixed guideway system would be elevated, at-grade, or below-grade.

The *Alternatives Analysis Report* is largely silent on whether the fixed guideway alternative would be at-grade or grade-separated (or a combination). The "optimum alternative" identified in the *Alternatives Analysis Report*, which apparently became the alternative endorsed in the DEIS, was compared to other alternatives differing in terms of method (*e.g.*, managed lane alternative, TSM alternative) and route, not above-grade versus at-grade. The only reference to an elevated fixed guideway in Chapter 6 is a statement that the Twenty-Mile Alignment "continues elevated following Nimitz Highway to Ala Moana Center." Id. at 6-5. Based on this chronology, it is KS' understanding that the discussion of what fixed guideway system is optimal for the urban core remains open. This is an opportune time to continue the discussions.

A ground-level transit system for the urban core is worth considering because it can meet performance demands, and it has been demonstrated to work in other cities. Los Angeles' Blue Line is an

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example of a rail system that utilizes a combination of at-grade, elevated, and subterranean technology. In the urban core of Long Beach, however, the Blue Line is completely at-grade. Our research indicates that the system carries 56,000 passengers per day with 20 peak hour trains running during both morning and afternoon commutes and 10 off-peak trains.

Portland's Tri-Met system is an example of a mixed-grade system. The Portland Metropolitan Area Express ("***MAX***") Light Rail system is at-grade through downtown and runs on elevated lines to the suburbs. Other types of trains also service the downtown area.

A similar at-grade system would be a viable option for the urban core of Honolulu. KS' understanding is that the desired through-put of the Project in mixed traffic is 3-minute headways and 6,000 passengers per hour per direction ("***pphpd***"). Experts have noted that a light rail transit ("***LRT***") system running on surface streets could satisfy the criteria. Three-minute headways equate to 20 train movements per hour; thus, a capacity of 6,000 pphpd requires that each train carry 300 passengers per hour. Modern light rail vehicles ("***LRV***") have a capacity in the range of 232 passengers per car. When operated in two-car trains, LRVs can exceed the throughput requirement.

Examples of at-grade LRT systems that can achieve the specified through-put include the following:

Alberta, Canada. Calgary, Alberta's system provides more than 6,000 pphpd capacity on Seventh Avenue, a surface street having numerous cross streets controlled by traffic lights. Its current schedules show that Calgary Transit operates its C-Train Route 201 (Dalhousie/Bridlewell-Somerset) every 4 minutes during the weekday morning and afternoon peak periods; the C-Train Route 202 (McKnight-Westwinds/City Centre) runs along Seventh Avenue every 6 minutes during the weekday morning and afternoon peak periods. This results in a combined headway of 2 minutes, 24 seconds. With the delivery during 2007 and 2008 of 40 additional LRVs, both of the light rail lines are being operated with three trains of Siemens-built U-2 and S160 LRVs, each with a practical capacity of 162 passengers, resulting in a practical capacity along Seventh Avenue of 12,150 pphpd based on 75 LRV car movements per hour.

Portland, Oregon. Portland, Oregon's MAX is a three-line LRT that operates through its central business district in curbside lanes along Morrison and Yamhill Streets. The three LRT lines currently operate a combined 4-minute headway (15 trains per hour in each direction) through Pioneer Square, the center of Portland's central business district, during the weekday morning and afternoon peak hours. A fourth LRT line, which will run for 1.8 miles through the central business district along Fifth and Sixth Avenues and on a 6.5 miles-long branch to Clackamas Town Center is nearing completion and is scheduled to be placed into passenger-carrying service on September 10, 2009.

Denver, Colorado. Denver's Regional Transit District operates 15 LRT trains (4-minute average headways) with lengths varying between two and four cars on its D, F, and H lines along California and Stout Streets. The West Line, a third LRT now under construction, will add two additional services throughout downtown Denver.

The above examples show that an at-grade transit system for the Honolulu urban core is an option worth serious study and consideration.

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Endnotes:

[1] KS is a landowner in Honolulu, and the proposed rail alignment traverses through four key communities in which KS has a combined land area of approximately 229 acres. In each community, the proposed rail line either bisects KS' land holdings or runs along the perimeter of its properties.

[2] See **Comment # 3** for a more specific discussion on parking impacts.

[3] This request is made pursuant to 40 C.F.R. §§ 1508.8 and 1508.14. "When an environmental impact statement is prepared and economic or social and natural or physical environmental effects are interrelated, then the environmental impact statement will discuss all of these effects on the human environment." 40 C.F.R. § 1508.14. The *Economics Technical Report Honolulu High-Capacity Transit Corridor Project* (RTD 2008c) issued by DTS on August 15, 2008 was also reviewed in formulating this comment.

[4] Mitigation measures for post-construction impacts are discussed in other sections of this letter.

[5] Note that the *Transportation Technical Report* was also reviewed in formulating this comment.

[6] Publication No. FHWA HI-88-054.

[7] Boulevard Saimin is identified as a historic property in the DEIS. See DEIS at Table 5-2, page 5-7.

[8] The DEIS provides, "Acquisition of property for the Build Alternative would be conducted in accordance with Federal and State regulations and procedures outline in the Real Estate Acquisition Management Plan (RTD 2008q). Where relocations would occur, affected property owners, businesses, or residents would receive compensation in compliance with all applicable Federal and State laws. Compensation would be in accordance with the Federal Uniform Relocation Assistance and Real Property Acquisitions Policies Act (CFR 1989)." DEIS at S-6.

[9] By way of example, although there are references to increasing the width of Dillingham Boulevard by ten feet, it is unclear whether each right-of-way taking along Dillingham Boulevard will be ten feet wide.

[10] The maps included in Appendix B of the DEIS indicate that the rights of way acquisitions "may be in the form of an aerial easement; an easement allowing joint use; subdivision of property with transfer of title; transfer of title for the entire parcel; or some other form to be documented by Land Court registration."

[11] By way of example, it would make sense to treat the parcels constituting Dillingham Shopping Plaza as a single parcel because they are owned and operated as an integrated economic unit.

[12] Defined consequences would also ensure that the City understands that the federal requirements are not merely guidelines (notwithstanding the label of "policies" or "plan"), but are enforceable obligations to be taken seriously with consequences for failure to comply.

[13] For example, if the City condemns a strip of land in the middle of a parcel, the City's condemnation could create two nonconforming (substandard) parcels. The City has not allowed the consolidation of the nonconforming parcels with adjoining parcels owned by the same party. Such nonconforming (substandard) parcels adversely impact the property owner's ability to develop, sell, or lease such parcels.

[14] If the City does intend to use its power to take private property for private development, including any TOD or TSD, it is requested that the Final EIS (a) describe in detail any such intended use of the City's eminent domain power, (b) evaluate and disclose the economic and social impacts of such action, and (c) propose mitigation measures.

[15] The DEIS contains Table 4-35, at 4-169, entitled "Rail System Benefits on Real Estate Values." This summary appears to be incomplete and could be misunderstood as showing how the Project will increase "home" values if the home is located closer to the rail line.

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[16] By way of example, a 1996 study of properties within a half mile of Portland's MAX stations had higher values but those within a half mile of the rail line, but not near a station, decreased in value. A 2004 study even showed that home values near the Chicago Midway Line station decreased in value after the rail project was completed.

[17] A study has shown that adjacency to transit stations is not a sufficient factor to cause development to occur. It found dozens of stations areas where no new development had occurred for 20 to 30 years. It is reported that along LA's Metro Blue Line, there has been little or no development activity along a several mile stretch of Long Beach Boulevard. Real estate professionals indicated that "the location of the transit line in the middle of the street had a significant negative impact on accessibility to retail businesses along the street.

[18] Development along the rail line will not likely occur automatically; governmental assistance and coordination are needed. It is reported that Portland TODs are heavily subsidized in the form of tax breaks, infrastructure subsidies, below-market land sales, and direct grants. The City of Portland has used tax incentives ($100 million of 10-year waivers of property taxes offered to high-density residences along the light-rail line) to help overcome redevelopment hurdles. This is excluding the $1.2 billion in tax-increment financing that Portland is offering to developers along the rail lines or similar direct subsidies offered by Portland's suburbs, including Gresham and Beaverton.

[19] It is important that KS, prospective investors, lenders, and affected businesses be given an opportunity to provide input on the bills. It should be noted that, the *Land Use Technical Report* provides that Kapalama has a "low potential for TOD," Table 5-1, at 5-4. KS requests further discussions with the City on the potential for TOD in Kapalama.

[20] This is the sum of the forecasted 3,530 boardings at the North King & Owen Street station; 2,580 boardings at the North King Street & Waiakamilo Road station; and 4,750 boardings at the North King Street at Liliha Street station. See *Alternatives Analysis Report* at Table 3-9, page 3-19.

[21] This is the sum of the forecasted 3,030 boardings at the Dillingham Boulevard & Mokauea Street station and 2,340 boardings at the Dillingham Boulevard & Kokea Street station. See *Alternatives Analysis Report* at Table 3-9, page 3-19.

[22] The term "fixed guideway" means:

> (4) Fixed guideway.--The term "fixed guideway" means a public transportation facility—
>
> (A) using and occupying a separate right-of-way or rail for the exclusive use of public transportation and other high occupancy vehicles; or
>
> (B) using a fixed catenary system and a right-of-way usable by other forms of transportation.

49 U.S.C. § 5302(a)(4). This definition does not distinguish between elevated and at-grade systems. Furthermore, according to the *Alternatives Analysis Report* at 5-5, the FTA Section 5309 New Starts program provides funds for the construction of a "new fixed guideway" system, which "refers to any transit facility that uses exclusive or controlled rights-of-way or rails, entirely or in part. Eligible purposes for these funds include light rail line, rapid rail (heavy rail), commuter rail, automated fixed guideway system (such as a 'people mover'), a busway/HOV facility, or an extension of any of these." Id.

[23] If the City did make a formal determination that an at-grade system is inferior to an elevated system and thus rejected an at-grade system as a viable alternative, information on that determination should be provided.

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TERM	DEFINITION
Alternatives Analysis Report	*Alternatives Analysis Report* dated November 1, 2006
Alternatives Screening Memo	*Alternatives Screening Memo Honolulu High-Capacity Transit Corridor Project* dated October 24, 2006, prepared by Parsons Brinckerhoff
BDMP	Business Disruption Mitigation Plan
CBRE	CBRE Consulting, Inc.
City	City and County of Honolulu
DEIS	*Honolulu High-Capacity Transit Corridor Project Draft Environmental Impact Statement/Section 4(f) Evaluation* dated November 2008
Detailed Definition	*Alternatives Analysis Detailed Definition of Alternatives Honolulu High-Capacity Transit Corridor Project* dated November 1, 2006, prepared by Parsons Brinckerhoff
DTS	Department of Transportation Services of the City and County of Honolulu
EIS	Environmental Impact Statement
FHWA	Federal Highway Administration
Final EIS	The Final EIS for the Honolulu High-Capacity Transit Corridor Project
FTA	Federal Transit Administration
HEPA	Hawai'i Environmental Policy Act, Hawai'i Revised Statutes, Chapter 343
KS	Kamehameha Schools
Land Use Technical Report	*Land Use Technical Report Honolulu High-Capacity Transit Corridor Project* (RTD 2008b) dated August 15, 2008
LRT	Light rail transit
LRV	Light rail vehicle
MAX	Metropolitan Area Express
MOT Plan	Maintenance of Traffic Plan
NEPA	National Environmental Policy Act, 42 U.S.C. § 4321 *et seq.*
Pphpd	Passengers per hour per day
Project	Honolulu High-Capacity Transit Corridor Project
RAMP	*Real Estate Acquisition Management Plan (RAMP) Honolulu High-Capacity Transit Corridar Project* (RTD 2008q) dated February 29, 2008 and revised on April 1, 2008
RTD	Rapid Transit Division of the Department of Transportation Services of the City and County of Honolulu
TMP	Transit Mitigation Plan
TOD	Transit-oriented development
Transportation Technical Report	*Transportation Technical Report Honolulu High-Capacity Transit Corridor Project* (RTD 2008a) dated August 15, 2008
TSD	Transit-supportive development
UltraSystems	UltraSystems Environmental
Visual and Aesthetics Resources Technical Report	*Visual and Aesthetics Resources Technical Report Honolulu High-Capacity Transit Corridor Project* (2008e) dated August 15, 2008

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AR00002216

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AR00002217

Status :	Initial Action Needed
Creation Date :	12/8/2008
Creator Affiliation :	
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Add to Mailing List :	Email
Submission Method :	Website
Other Submission Method :	
Submission Date :	12/08/2008
Submission Content/Notes :	Please consider Councilman Djou's recommendation to begin rail construction at the east end of any proposed route, working toward the ewa direction. If only partial work can be accomplished, what is completed at the east end would be useable. If there is merely a portion completed at the west end it would not prove to be very valuable. Thank you for your consideration. Richard Kamis

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, 3RD FLOOR
HONOLULU, HAWAII 96813
Phone: (808) 768-8305 • Fax: (808) 768-4730 • Internet: www.honolulu.gov

MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-331507

Mr. Richard Kamis
kamii@hawaii.rr.com

Dear Mr. Kamis:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall indentify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraph addresses your comments regarding the above-referenced submittal:

As described in Section 2.5.10, Project Phasing, and further in Section 8.6.9, Construction Phasing, in the Final EIS, to support phased opening, the first construction phase must be connected to a maintenance and storage facility, which requires considerable space. No location has been identified closer to Downtown with sufficient available space to construct a maintenance and storage facility. Therefore, construction will begin between East Kapolei and Leeward Community College. The Project will be constructed in phases to accomplish the following:

- *Match the anticipated schedule for right-of-way acquisition and utility relocations.*
- *Reduce the time that each area will experience traffic and community disturbances.*

- *Allow for multiple construction contracts with smaller contract size to promote more competitive bidding.*
- *Match the rate of construction to what can be maintained with local workforce and available financial resources.*
- *Balance expenditure of funds to minimize borrowing.*

The portion of the corridor in the Ewa direction of Pearl Highlands is less developed than the areas in the Koko Head direction. Right-of-way can be obtained more quickly at the west end of the Project; therefore, overall project construction can begin earlier, resulting in lower total construction costs. Construction is planned to continue uninterrupted in the Koko Head direction from Pearl Highlands to Aloha Stadium, Kalihi, and finally to Ala Moana Center.

The FTA and DTS appreciate your interest in the Project. The Final EIS has been issued in conjunction with the distribution of this letter. You may view the Final EIS on the Project website at www.honolulutransit.org. You may request a DVD of the Final EIS and additional content through the "Contact Us" tab on the website or by calling the Project hotline at 566-2299. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

From: Djou, Charles
Sent: Tuesday, December 09, 2008 9:41 AM
To: Matsuda, Sylvia
Subject: FW: Honolulu Transit

Please submit as comments to the DEIS for me

Charles K. Djou
Councilmember, District IV (Waikiki, East Honolulu)
Honolulu City Council
530 South King Street, Suite 202
Honolulu, Hawaii 96813
Phone: (808) 768-5004
Fax: (808) 550-5689
Email: cdjou@honolulu.gov
Web: www.honolulu.gov/council/d4

From: Richard Kamis [mailto:kamii@hawaii.rr com]
Sent: Monday, December 08, 2008 3:11 PM
To: tapou@honolulu.gov; DelaCruz, David A; Marshall, Barbara; Kobayashi, Ann H.; Tam, Rod; Okino, Gary; Garcia, Nestor
Cc: Djou, Charles
Subject: Honolulu Transit

We respectfully request your consideration of Charles Djou's recommendation to begin construction of the transit system at the East end of the proposed route working toward the west end

If monies should fail and the project be halted, a portion at the East end should be useable whereas a portion only at the West end is not likely to be particularly useful

Additionally, we truly hope that you seriously believe that monies will be available for this project We have serious question regarding this, considering inevitable overruns and the disastrous "Boston Big Dig" history of the company that Honolulu apparently plans to use. Reports surely indicate that Boston is in major financial trouble as a result!

Richard P Kamis
Kalakaua Avenue
Honolulu

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-334566

Mr. Richard P. Kamis
kamii@hawaii.rr.com

Dear Mr. Kamis:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

As described in Section 2.5.10, Project Phasing, and further in Section 8.6.9, Construction Phasing, in the Final EIS, to support phased opening, the first construction phase must be connected to a maintenance and storage facility, which requires considerable space. No location has been identified closer to Downtown with sufficient available space to construct a maintenance and storage facility. Therefore, construction will begin between East Kapolei and Leeward Community College. The Project will be constructed in phases to accomplish the following:

- *Match the anticipated schedule for right-of-way acquisition and utility relocations.*
- *Reduce the time that each area will experience traffic and community disturbances.*

- *Allow for multiple construction contracts with smaller contract size to promote more competitive bidding.*
- *Match the rate of construction to what can be maintained with local workforce and available financial resources.*
- *Balance expenditure of funds to minimize borrowing.*

The portion of the corridor in the Ewa direction of Pearl Highlands is less developed than the areas in the Koko Head direction. Right-of-way can be obtained more quickly at the west end of the Project; therefore, overall project construction can begin earlier, resulting in lower total construction costs. Construction is planned to continue uninterrupted in the Koko Head direction from Pearl Highlands to Aloha Stadium, Kalihi, and finally to Ala Moana Center.

The financial plan is balanced for the entire Project so there will not be a situation in which only a portion of the system will be built. If there is a shortfall, additional revenue sources will be considered. Section 6.6 of the Final EIS discusses risks and uncertainties, as well as potential sources to cover shortfalls.

The FTA and DTS appreciate your interest in the Project. The Final EIS has been issued in conjunction with the distribution of this letter. You may view the Final EIS on the Project website at www.honolulutransit.org. You may request a DVD of the Final EIS and additional content through the "Contact Us" tab on the website or by calling the Project hotline at 566-2299. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Status :	Initial Action Needed
Creation Date :	1/26/2009
Creator Affiliation :	
First Name :	David
Last Name :	Kammerer
Business/Organization :	
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Email :	kammered@byuh.edu
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Telephone Extension :	
Add to Mailing List :	None
Submission Method :	Website
Other Submission Method :	
Submission Date :	01/26/2009
Submission Content/Notes :	I still wish there were a way to convince you that, although Oahu's political power brokers obviously see this light rail as an economy-boosting public works project, somebody's got to foot the bill. I am absolutely convinced that the unintended consequences of this project will be to place a backbreaking strain on Hawaii's taxpayers that will hurt the county's economy in many ways both short- and long-term--a net negative for this island's residents for at least fifty years. I guess your children and my children will find out which of us was right.

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-334312

Mr. David Kammerer
55-044 Kamehameha Highway
Laie, Hawaii 96762

Dear Mr. Kammerer:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address comments regarding the above-referenced submittal:

Chapter 6 of the Final EIS describes the financial resources anticipated to be needed to pay for the capital cost of the Project and for ongoing operating and maintenance costs. Capital costs of the Project, including finance charges, are expected to be fully paid for by a combination of FTA Section 5307 and FTA Section 5309 New Starts Funds from the Federal government and revenues from the County General Excise and Use Tax (GET) surcharge levied from 2007 through 2022 on Oahu. Operating and maintenance costs will be paid for from the same sources currently used for TheBus: Federal funding, fare revenues, and City revenues from the General and Highway Funds.

The Purpose and Need of the Project are discussed in Chapter 1 of the Final EIS. The Project will improve corridor mobility, reliability, access to planned development to support City policy to develop a second urban center, and transportation equity.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
Creation Date :	1/25/2009
Creator Affiliation :	
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Telephone :	247-3993
Telephone Extension :	
Add to Mailing List :	Both
Submission Method :	Website
Other Submission Method :	
Submission Date :	01/25/2009

Submission Content/Notes : I am in favor of building the "Minimum Operating System" from the airport area to Ala Moana, starting from the airport, not Kapolei.

Why?
During recent testimony, the question came up, "Where are we going to get the money to build the entire project?"
Under questioning, Wayne Yoshioka said that he guarantees that we have enough money to complete the MOS (Kapolei to Waipahu).
What about the rest of the project? If we run out of money, if we complete only the MOS, shouldn't it be in the town area?

Councilmember Cachola asked for an explanation of the rising cost of the project from $3.7B to $5.3B and the fact that the city had only received $246M in 20 months.
$246M is about $60M short of what is necessary to stay on track to reach the original $3.7B estimate, and is woefully short of the $5.3B "2008 cost of expenditure" estimate.
Director Yoshioka says that $5.3B is today's dollars, insists that they have a good fiscal plan and he talks about the cyclical nature of the economy.

Please, help me understand:
1. The estimate for the project has gone up $1.6B (from $3.7B to $5.3B) since 2006.
2. Is $5.3B the expected final cost in 2020, or what will it go up to ???????
3. We are in an economic slump which is projected to last several years and revenues are declining.
4. Currently, we are already short of the expected funds and it will get even worse.
5. Is it expected that the half% GET is going to pick up to a point where it makes up for the current shortage and the expected shortage?
6. Is it expected that the half% GET will increase to a point where it will cover the expected rise in project cost "2020 cost of expenditure"?
7. The state is facing a budget shortfall and there is now, a looming threat for the state to withhold the half% GET for at least a year.

Will any of the above facts affect the City's ability to complete the entire rail project within budget?
If the answer is yes, then we deserve to at least have an MOS that is complete, useable, generating revenue and ready to expand to Waikiki and UH Manoa.

Thank you,

Ted Kanemori
46-066 Heeia St
Kaneohe, HI 96744
Ph: 247-3993
E-mail: ted@tk-serve.com

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-334291

Mr. Ted Kanemori
46-066 Heeia Street
Kaneohe, Hawaii 96744

Dear Mr. Kanemori:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

As described in Section 2.5.10, Project Phasing, and further in Section 8.6.9, Construction Phasing, in the Final EIS, to support phased opening, the first construction phase must be connected to a maintenance and storage facility, which requires considerable space. No location has been identified closer to Downtown with sufficient available space to construct a maintenance and storage facility. Therefore, construction will begin between East Kapolei and Leeward Community College. The Project will be constructed in phases to accomplish the following:

- *Match the anticipated schedule for right-of-way acquisition and utility relocations.*
- *Reduce the time that each area will experience traffic and community disturbances.*

- *Allow for multiple construction contracts with smaller contract size to promote more competitive bidding.*

- *Match the rate of construction to what can be maintained with local workforce and available financial resources.*

- *Balance expenditure of funds to minimize borrowing.*

The portion of the corridor in the Ewa direction of Pearl Highlands is less developed than the areas in the Koko Head direction. Right-of-way can be obtained more quickly at the west end of the Project; therefore, overall project construction can begin earlier, resulting in lower total construction costs. Construction is planned to continue uninterrupted in the Koko Head direction from Pearl Highlands to Aloha Stadium, Kalihi, and finally to Ala Moana Center.

As portions of the Project are completed, each will be opened incrementally so that system benefits, even if limited during the initial phases, will be realized prior to completion of construction of the entire Project.

The following responses correspond to your numbered list of questions:

1) At the time of the Alternatives Analysis, the capital cost of the Salt Lake Alternative was estimated to be $3.72 billion, including finance charges, expressed in year 2006 dollars. In Year-of-Expenditure dollars the same estimated cost was $4.98 billion. As shown in Table 6-1 of the Draft EIS, the cost of the Salt Lake alternative, in Year-of-Expenditure dollars (i.e., including inflation), was estimated to be $5.276 billion, an increase of less than $300 million. The City selected the Airport Alternative for which the costs are estimated to be $5.513 billion (Table 6-1 in the Final EIS) including finance charges.

2) As noted above, the $5.513 billion estimated cost for the Airport Alternative is expressed in Year-of-Expenditure dollars. This is the anticipated final cost including finance charges. Project costs, excluding finance charges, will be expended through calendar year 2019. Finance charges will continue through calendar year 2022.

Comments 3 to 6) The capital plan that analyzes capital expenditures for the Project is presented in Section 6.3 of the Final EIS and takes the current economic downturn into account. Section 6.6 of the Final EIS describes risks and uncertainties associated with these funding assumptions. The financial planning assumes a much lower forecast of the General Excise and Use Tax (GET) surcharge revenue. If GET collections return to originally anticipated levels the Project will benefit from those funds.

7) By law, the State is required to collect the GET surcharge and to turn over the proceeds, less an administrative fee of 10 percent, to the City on a quarterly basis. Unless State law is changed this obligation remains, regardless of the State's budget condition. The law has not been changed.

Lastly, the capital plan that analyzes capital expenditures for the Project is presented in Section 6.3 of the Final EIS, including a description of the amount of funding anticipated from various sources. As noted above, Section 6.6 of the Final EIS describes risks and uncertainties of the funding assumptions. The finances are balanced and other funding sources are identified should there be additional need for funds.

The FTA and DTS appreciate your interest in the Project. The Final EIS has been issued in conjunction with the distribution of this letter. You may view the Final EIS on the Project website at www.honolulutransit.org. You may request a DVD of the Final EIS and additional content through the "Contact Us" tab on the website or by calling the Project hotline at 566-2299. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
Creation Date :	12/5/2008
Creator Affiliation :	
First Name :	Laura
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Telephone :	
Telephone Extension :	
Add to Mailing List :	Both
Submission Method :	Website
Other Submission Method :	
Submission Date :	12/05/2008
Submission Content/Notes :	1. Please make sure that the rail cars have space for luggage if the airport stop is included. Right now, I cannot take the bus to the airport since it does not allow for luggage. 2. What is the estimated part replacement time for a steel-on steel system in a salt water climate due to corrosion?

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, 3RD FLOOR
HONOLULU, HAWAII 96813
Phone: (808) 768-8305 • Fax: (808) 768-4730 • Internet: www.honolulu.gov

MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-331292

Ms. Laura Keaton
86-058 Alta Street
Waianae, Hawaii 96792

Dear Ms. Keaton:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall indentify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

Luggage allowances for the rail system will be more permissive than those for TheBus because it will be easier to safely enter, exit, and ride the train with luggage. Separate luggage areas are not planned. Riders will only be allowed to bring on luggage that they can safely be managed.

To respond to your second question, corrosion control measures will be applied to the Project's fixed steel facilities and neighboring utility structures to provide proper operation over their lifetime. These measures include the following:

- *Protective coating specification for steel aerial structures*
- *Coating specification for stations*

- *Preventive measures against stray current corrosion*
- *Corrosion control design of transit underground utilities and neighboring utilities owned by others*

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

M. KERR
3810 Leahi Ave. #204
Honolulu, HI 96815

Pls place on mayor's desk Thank you

Monday, November 10, 2008

Dear Mayor Hanneman and Mr. D'Jou:

Pls accept my feelings on the rapid transit that now has been voted in. I am from Vancouver, Canada, where of course we have an outstanding system, I believe Honolulu is basing their system on Vancouver's. I am used to riding the VCR system and it is outstanding,
My big fear is that Honolulu won't get it right. I ride the BUS occasionally to my job at Kaiser Hosp and find the bus to very inefficient, and so I am afraid that the train will be inefficient.

I feel the only way to get an efficient train is to make sure that the "good of the whole" is served and not just a minority group ie: Salt Lake residents. If the good of the whole population is served, then there will be links to the airport, UH, Ala Moana and Waikiki. If the city decides to go with what is good for the minority, I see a very inefficient system with low ridership and a waste of taxpayer's money and I would be resentful of my tax dollars going to fund a system that serves the minority.

Putting a link to Salt Lake and not the airport would be the height of stupidity. It would symbolize that we are NOT a progressive city. Every progressive city links rapid transit to the airport. Honolulu, especially, should have a link to the airport, as tourism is our number 1 industry. Right now you cannot take luggage on the #42 bus to the airport which is ludicrous, it does not make sense. In Vancouver, you can take luggage on the airport city bus routes and they are also building an airport link that arriving tourist can take right to downtown in 22 min.

Mr Cachola may need to understand that Honolulu must do what is best for the whole/majority of the island and that just because his constituents want a link to Ala Moana mall to spend the day is not a reason to put a SL link in before serving the airport. The majority must be served before the minority is served.

Mr. Hanneman, please get it right and do the right thing with the links, and please also allow luggage on the train. Having a train to the airport and not allowing luggage would be ludicrous. Also, luggage should be allowed on the city buses that will link to the train. Please make this a modern and efficient and user friendly to the people system.

Thank you, Anna Kerr RN at Kaiser Hospital and resident of Diamond Head area 924-6694

RECEIVED
2008 NOV 23 P 9:23
DIRECTOR'S OFFICE
TRANSPORTATION SERVICES

11-20-08
This is a copy of a letter I sent to the mayor + my city council person. Thank you.

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
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DEPUTY DIRECTOR

June 11, 2010 RT11/08-289115R

Ms. Anna Kerr
3810 Leahi Avenue, #204
Honolulu, Hawaii 96815

Dear Ms. Kerr:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

As documented in Chapter 1 of the Final EIS, the bus system is affected by congestion, which results in poor reliability and slower speeds. The fixed guideway system is being designed to improve transit reliability and speed. Since the fixed guideway system will operate in an exclusive right-of-way, service will not be affected by surrounding roadway conditions. Bus routes will be enhanced to create more fluid travel between TheBus and the transit system. Existing and future bus routes, including route numbers and frequencies, are presented in Appendix D of the Final EIS.

Your preference for the Airport Alternative has been noted. While each of the alternatives discussed in the Draft EIS includes trade-offs between benefits and impacts, the Airport Alternative from East Kapolei to Ala Moana has been selected as the Preferred Alternative as described above. As compared to the alternatives discussed in the Draft EIS, the

Airport Alternative will carry the most passengers, provide the greatest transit-user benefits, and result in the fewest vehicle hours of delay. It will provide access to employment centers at Pearl Harbor Naval Base and Honolulu International Airport and will serve the Salt Lake neighborhood with connecting bus service. Of the three Build Alternatives addressed in the Draft EIS, the Airport Alternative will have slightly less impacts to the natural and built environment analyzed in the Draft EIS. During the public comment period on the Draft EIS, the public overwhelmingly supported the Airport Alternative. Of the comments that specifically supported one of the alternatives, more than 75 percent were in support of the Airport Alternative. For more information this selection is discussed in Section 2.4 of the Final EIS. Since publication of the Draft EIS, design has been advanced, further analysis has been completed, and information has been added in response to comments on the Draft EIS and agency coordination. The Final EIS discusses the process that was used to select the Preferred Alternative, how comments were considered in the decision-making process, impacts and mitigation commitments.

Lastly, to address your comment about luggage on the system, the luggage policy for the system is not final, but the concept of the policy will be to allow luggage on the fixed guideway that does not interfere with the safety of comfort of other passengers. No change to policy on TheBus is proposed at this time.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
Creation Date :	2/6/2009
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Submission Method :	Website
Other Submission Method :	
Submission Date :	02/06/2009

Submission Content/Notes : Aloha:

Thank you for the opportunity to comment.

Along the proposed rail route, 62% of Oahu's population in 2000 according to the DEIS Table 1-5 is concentrated between Kaimuki-Waialae and Salt Lake-Aliamanu. The route could be nearly half as long and still accommodate the majority of the current population in the project corridor.

Presumably, the second half of the proposed rail route (Pearl City-Aiea to Kapolei) is justified based on the anticipated population growth between now and year 2030. If growth predictions shown in Table 1-5 are correct, 53% of Oahu's population along the proposed rail route will be concentrated between Kaimuki-Waialae and Salt-Lake Aliamanu. Therefore, even though the population in the Pearl City-Aiea to Kapolei area is projected to increase by about 70% over the current population in this area by 2030, the majority of people in the project corridor will still be concentrated between Kaimuki-Waialae and Salt Lake-Aliamanu. It is therefore illogical to nearly double the rail route to accommodate less than half of the projected population in the project corridor, much of which hinges on proposed developments that do not yet currently exist.

These proposed developments are likely to exist at least partially on agricultural lands – even prime agricultural lands. Constructing this rail transit system on agricultural lands (prime, unique, or of statewide importance, or otherwise), through agricultural lands to serve developments that are built on agricultural lands is not sustainable or in the best long-term interest of Oahu's people.

Prime, unique, and statewide important lands are, by definition, of agricultural importance. Land with such classification is significant, not negligible, regardless of acreage. To trivialize the absorption of such lands on the grounds that only a small amount of it will be sacrificed is not acceptable. Conversion of land with such classification is, according to the ALISH system that defines these classifications, irreversible and therefore not a decision that should be taken lightly or trivialized because of scale. Any final EIS must provide measures to adequately mitigate the loss (88 acres of prime, unique, or statewide important lands will be acquired by the Build Alternatives) of such important lands.

According to the 2002 Census of Agriculture (USDA 2004) that the DEIS cites, only 18% of land on Oahu is farmland compared to over 30% of land on each of the main outer islands in Hawaii. Land available and suitable for farming on Oahu is dwindling. Subtracting another 88 acres will not help Oahu's food independence and is not so insignificant that it can be ignored.

Even if 88 acres represents a small percentage of agricultural land on Oahu, converting prime agricultural land to urban development further confirms that we are okay with rezoning productive land arbitrarily. Prime agricultural land should be staunchly reserved for agriculture. Zoning changes should have a scientific, not political, basis. If we continue to

indulge the perception that rezoning relatively small quantities of agricultural land for development is insignificant, eventually there will be no agricultural land left to rezone. There is nothing negligible about that in terms of loss of biodiversity and food security.

On her website, Governor Lingle states:

"Hawai`i produces only 15 percent of its own food. That's not acceptable and shouldn't be for the State. We need to take action now to increase food self-sufficiency for Hawai`i and preserve and strengthen the agriculture industry for future generations.

We must increase our efforts to protect the best agricultural lands from development and preserve them for agriculture into the future and we must strengthen our commitment to p providing infrastructure and water for agriculture. Increasing our food self-sufficiency will contribute to our own communities rather than sending our dollars out of the State for imported food."

Loss of any prime, unique, or statewide important agricultural land undermines this mission.

It is unclear whether the 88 acres of agricultural land to be absorbed by this project is limited to the rail route itself and associated facilities or is extended to include agricultural lands adjacent to construction boundaries. There exists a myriad of evidence that when transit routes are created, development crops up around it. This is the basis of the popular "if you build it, they [development] will come" mentality, which is one of the arguments used to justify building a mass transit system through non-urban regions. Once the rail transit route is in place, it is expected that development will occur along the route. Therefore, any existing agricultural land along the route will also be affected by the project. In order for any final EIS for rail transit to accurately and completely examine the environmental impacts to agricultural lands, the project must include agricultural lands adjacent to project construction boundaries.

The DEIS claims that "all of the affected properties designated as prime, unique, or of statewide importance and/or actively being farmed are owned by individuals, corporations, or agencies that plan to develop them in conformance with the Ewa Development Plan (DPP 2000)". However, on the DPP's website for the Ewa Development Plan, the first sentence is "Tha Plan protects prime agricultural lands". Which is true?

Regardless, the land in question remains prime, unique or statewide important agricultural land. Therefore the future state of the land should be irrelevant when discussing environmental impacts to it, as the scope of this DEIS is to examine environmental impacts on the current conditions and not on future planned conditions that do not exist.

A detailed plan for mitigating all negative environmental impacts to agricultural land affected by this projects including an analysis of alternative routes to preserve prime, unique, and/or statewide important

agricultural land must be provided in any final EIS. If such land must be used for the proposed project, land equivalent in acreage and quality (as defined by equivalent ALISH soils classifications and water availability) must be provided elsewhere to replace the land consumed by this project's development.

Figure 1 at http://equiliberate.org/fig1.jpg plots data shown in Figure 1-1 of the DEIS as vehicle miles traveled (VMT) per registered automobile over time from 1980 to 2006. People are logging more miles today than in the last three decades.

Based on project population in 2030 shown in Figure 1-5 of the DEIS, city area, and year 2000 population density from the U.S. Census Bureau, the population density for Kapolei and Makakilo, Ewa, Waipahu and Waiawa, and Downtown Honolulu are plotted in Figure 2 (at http://equiliberate.org/fig2.jpg) for year 2000 and year 2030. Projected population density is plotted for year 2030. Kapolei and Makakilo, and Waipahu and Waiawa, were combined since data was given by zipcode and these regions share the same zipcode. Downtown Honolulu was included to provide a baseline population density reflecting urban development on Oahu. Figure 2 then shows population densities for Kapolei, Makakilo, Ewa, Waipahu, and Waiawa that are about 50% less than that of Downtown Honolulu. This difference can be attributed to the fact or likelihood that suburban sprawl either exists or is planned for the Waiawa through Kapolei area. Greater distances between community services increase the need for automobile use, thereby

1)Negatively impacting convenience of using a public mass transit system.
2)Creating an increased need for automobile support facilities (i.e. park-and-rides, access ramps, roadways, etc.) in order to enable the population to use a public mass transit system.
3)Decreasing the likelihood that the population in this area will use a public mass transit system.

The presence of a mass transit system has a proven record of encouraging development along the transit corridor, as evidenced by the increasing real estate values associated with properties closer to transit stations given in Table 4-35 of the DEIS for various existing transit systems in the United States. The environmental impacts associated with encouraging suburban sprawl, especially since the DEIS uses this projected growth as a justification for extending the Build Alternatives to the Waiawa through Kapolai area (Chapter 1, in particular), must be discussed, and measures for mitigating adverse impacts must be provided, in any final EIS.

According to the DEIS, the methodology for projecting future air quality as a result of the various project alternatives is based on anticipated vehicle miles traveled (VMT) and average network speed for each alternative. The data given in the DEIS indicates that all Build Alternatives yield better air quality than the No Build alternative. The only logical way for this to occur is if the proposed rail transit system replaces enough cars on the road such that its emissions are less than the

collective emissions of the cars it replaces. In other words, the data shown in Table 4-12 of the DEIS depends on the number of cars that the rail transit system takes off the road. There are so many variables involved in determining the number of cars that the rail system will take off the road that a number of different scenarios could result. How accurate is the data shown in Table 4-12? What assumptions were made to produce the data shown in Table 4-12?

Is it possible that the emissions generated from using electricity to operate any of the Build Alternatives would not be offset by reductions generated by any reduced VMT? That is, is it possible that emissions generated by operating any of the Build Alternatives will exceed emissions reductions resulting from reduced VMT? What assumptions were made in determining VMT?

Any final EIS must include measures for mitigation for scenarios where emissions from any of the Build Alternatives exceeds those of the No Build Alternative. The DEIS states that "Any measures to reduce automobile travel would reduce air pollutant emissions". This is not necessarily true. An attempt to reduce air pollutant emissions may not be successful. Consider the worst case scenario: the rail transit system is built and operable but is not sufficiently used. In this case, resultant emissions would actually exceed that of the No Build Alternative since additional cars would be in operation in addition to the rail system. This DEIS does not confirm that this scenario end/or other less extreme scenarios are not possible. Such a statement is therefore not justified and should be removed in any final EIS.

From the data presented in the DEIS, it is unacceptable to consider only Ldn (24-hour average, penalizing night noise) and/or Leq (average sound). The maximum noise levels must be the criteria used to determine environmental impacts of noise since a few extremely noisy events, like a train rolling by, can be balanced with no noise (no train) to produce an average sound event that is only moderately noisy. People will not likely experience the average noise depicted in Figures 4-39 to 4-42 at any given moment, rather they will experience the maximum noise levels and minimum noise levels independently. If my interpretation of this information is incorrect, the final EIS should provide clarification.

The DEIS states that once the project is operating, noise levels will be measured to determine the actual extent of project noise impacts. However, no measures for mitigating any moderate and/or severe noise impacts that may arise are provided. Any final EIS must include a methodology for noise mitigation that the project shall adhere to.

The DEIS states that the proposed Build Alternatives will have no effect on endangered and protected waterbirds despite the fact that waterbird habitats exist within the project boundaries. The justification for this claim given in the DEIS is that

"Over time, the waterbirds would adjust to new structures built for the Project since the wetlands would remain intact. This is expected

because the waterbirds have continued to occupy the wetlands after tha construction of nearby buildings and overhead utilities and the construction or widening of adjacent roads or highways."

Have any studies been conducted that investigate the environmental impacts of development on endangered waterbirds and protected waterbirds and their habitats? If so, please provide sources for each study and state whether or not the study findings support the DEIS claim that there will be no effects. Did the previous construction activities (construction of nearby buildings and overhead utilities and the construction or widening of adjacent roads or highways) result in noise intensity and duration, site disturbance, and all other environmental impacts to the endangered waterbirds' and protected waterbirds' habitat equivalent to each of the proposed Build Alternatives? If so, please provide evidence that supports this claim. Was the proximity from previous construction activity to wetlands and/or endangered waterbird and protected waterbird habitat the same as the proximity from the proposed construction activity to the wetlands and/or endangered waterbird and protected waterbird habitat? Will the noise in the areas where endangered waterbirds were observed remain the same after any of the proposed Build Alternatives are complete and operational? If not, the environmental impacts of noise on endangered waterbird and protected waterbird habitat must be investigated in any final EIS and mitigating measures must be provided.

What is the accuracy of the each field survey conducted and bird point counts? What is the margin of error? If accuracy cannot be guaranteed, a potential for environmental impacts to endangered terrestrial fauna exists. These impacts must be identified in any final EIS, and measures to mitigate these impacts must be included in any final EIS.

Are the "numerous canopy trees" in the Tern habitat enough to support the existing and future white tern population? What is the basis of the claim in the DEIS that the other large canopy trees in urban Honolulu will result in no impact to the white tern population? Please provide sources to substantiate this claim.

How were field surveys conducted? The DEIS explains the procedure for conducting point counts but not field surveys. Any final EIS must include the procedure followed for conducting field surveys.

Why was 8 minutes the duration used for point counts? Please provide a justification for the use of this time interval. One study found that on average 55% of all initial species detections occurred within the first 5 minutes, and 82% of all initial species detections occurred within the first 10 minutes, of 15-minute long point counts regardless of time of day or use of aural stimuli. If the results of this study hold true for Hawaii, only about a 75% of all species were detected over the 8-minute period. Were single or multiple visits conducted? Bartlet, et al. (1999) recommended two visits.

What time of day were point counts conducted and was any aural stimuli used?

The results of the Water Quality Impact Assessment for the EPA must be included in any final EIS and the public must have an opportunity to comment on this study.

What permanent BMPs will be implemented to ensure there is no change in the amount of infiltration? An increase in infiltration relative to existing conditions can have positive environmental impacts. Have any studies been conducted to determine if this is feasible?

The DEIS states that because the Project would rely on electric propulsion, minimal pollutants would be generated on the guideway relative to pollutants generated by roadway traffic. Has a study been conducted that confirms this assumption? If so, please provide a source.

The DEIS does not acknowledge the fact that floodplains provide ecological benefits beyond groundwater recharge and infiltration, including but not limited to maintenance of biodiversity and fish habitats. In fact, the DEIS states the contrary by saying "the only beneficial functions for the floodplains analyzed in the study corridor are the recharge of groundwater and drainage conveyance". Please provide evidence to support this claim.

The DEIS states that a 2% reduction in energy consumption would result from each of the project Build Alternatives relative to the No Build Alternative. The transportation analysis is referenced as the source for this analysis of operational energy consumption. The transportation analysis references the Oahu MPO Travel Demand Forecasting Model as the source of the daily trips per transportation type per Alternative data. This data is the basis of system-wide daily travel data (vehicle miles per day per for each alternative), which is the basis of the total energy consumption of each alternative presented in Table 4-18. The Travel Forecasting Methodology Report, which explains the details of the Travel Demand Forecasting Model, states that "The mode choice model was also updated and recalibrated to improve accuracy of the model coefficients and relationships and to calibrate the alternative-specific constants. ...The mode choice model was re-calibrated as part of the Draft EIS process; however,
the details of it are not discussed in this report. " Where can these details be found?

What assumptions were made in the determination of transit ridership? In Table 4-18, Total energy consumption is the sum of roadway and bus energy consumption and the fixed guideway vehicle energy consumption. The latter energy consumption is greater across all Build Alternatives relative to the No Build Alternative. Therefore, the energy savings of the Build Alternatives results solely from reduced roadway and bus energy consumption. Indeed, the No Build Alternative energy consumption in this category exceeds the energy consumption of each Build Alternative in this category. Therefore, the DEIS assumes that less automobile and bus vehicle miles will be traveled in each Build Alternative. That is, Table 4-18 assumes that operation of the fixed guideway system will result in less automobile and bus usage. What

data is this assumption based on? How was transit ridership projected? Is it possible that transit ridership will not result in less roadway and bus energy consumption (i.e. fixed guideway vehicle energy consumption exceeds roadway and bus energy savings)? Please provide a justification for any response to this question. Did the model consider that automobiles may become increasingly more efficient by 2030 and into the future?

The fact that photovoltaic cells could be integrated into project stations to reduce project electricity demand, as the project states as a measure of mitigation, provides no tangible mitigating effect. Any final EIS must provide a detailed analysis of measures that could be taken to reduce the project's net electricity demand and total energy consumption. This analysis must consider the feasibility of integrating alternative energy technologies into the project as well as an analysis of energy conservation measures that could be implemented to increase the operational efficiency of the system.

The DEIS lists a number of ways the volume of hazardous materials used and extent of worker exposure could be limited as a means for mitigation. This list of mitigating measures must be implemented in order to adequately mitigate environmental impacts of hazardous waste.

It is not acceptable to use prime agricultural land as a site for a maintenance and storage facility when a clear alternative (given in the DEIS) is present.

Why is the entire transit route (in all Build Alternatives) elevated? Kapolei is currently grossly undeveloped. The transit route should be placed at ground level where geography permits to preserve view planes and reduce construction cost and energy consumption. This would result in 150,000 MBTU energy savings per track mile during construction, based on the information provided in the DEIS. Any final EIS must consider energy conserving measures like this.

Where clearing and grubbing occurs, will these areas be revegetated to the extent possible? The DEIS is not clear on this point.

Will pruning of trees found to contain chicks be delayed until chicks fledge or not? The DEIS is not clear on this point.

Under what conditions will additional studies, such as but not limited to a complete Phase I Environmental Site Assessment, during the design or construction phase be performed? Will remediation of contaminated soil and groundwater that is discovered during the project occur? To what extent?

In addition to demolished material, will every effort be made to recycle or make available for reuse unused construction materials and other waste generated on site? What measures will be taken to minimize the amount (in weight and/or volume) of construction waste generated over the project construction phase?

Any final EIS must provide margins of error for all data and assumptions made in the DEIS.

Please send comment responses to:

Kim Kido
1348 Alewa Drive
Honolulu, HI 96817

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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June 11, 2010

RT10/09-338004

Ms. Kim Kido
1348 Alewa Drive
Honolulu, Hawaii 96817

Dear Ms. Kido:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address comments regarding the above-referenced submittal:

With a population of around 340,000, the Kaimuki-Waialae to Salt Lake-Aliamanu area described in your comment contains approximately 40 percent of the island's population of 876,200 people, and contains approximately 61 percent of the population of 552,100 within the transit corridor. The remaining transit corridor area (Salt Lake-Aliamanu to Kapolei) contains the other 39 percent of the population. While the remaining corridor contains a smaller population, shortening the route will fail to serve a large population with substantial transit demand.

As stated in Chapter 4, Section 4.2.3 of the Final EIS, the farmlands that will be acquired for the Project are in the Ewa Plain. The Ewa Development Plan designates areas for dense development while preserving other areas for agriculture. A maximum of 80 acres of prime farmland and 8 acres of statewide-important farmlands will be acquired by the Project, of which 70 acres are actively cultivated. All of the affected properties designated as prime, unique, or of statewide importance and/or actively farmed are owned by individuals, corporations, or agencies

that plan to develop them in conformance with the Ewa Development Plan. The Project will be constructed on land designated for development as outlined in the Ewa Development Plan.

The 88 acres of prime, unique, and statewide-important land impact includes land that may be used for a maintenance and storage facility. One of the two alternatives for a maintenance and storage facility is in agricultural-related use (Aloun Farms). The preferred maintenance and storage facility site is located near Leeward Community College and is the site of a former Navy fuel storage and delivery facility. The Leeward Community College location is the preferred location for the maintenance and storage facility, and DTS has been working with the Navy to acquire it. If the City can acquire this site, only 47 acres of land designated as prime or of statewide importance will be acquired for the Project.

As stated in Section 4.2.3 of the Final EIS the 2002 Census of Agriculture (USDA 2004) reported that there are more than 70,000 acres of agricultural land in cultivation on Oahu, including those designated as prime, unique, or of statewide importance. The displacement of agricultural lands as a result of the Project represents less than one-tenth of one percent of available agricultural land. Considering that the amount of affected farmland is such a small proportion of all agricultural lands on Oahu, including those designated as prime, unique, or of statewide importance, the effect will not be substantial and no mitigation will be required.

As stated in Section 4.2.3 of the Final EIS, the proposed maintenance and storage facility site in Ewa is about half the amount of farmland required for the Project. If DTS can acquire the Leeward Community College site, only 47 acres of land designated as prime or of statewide importance will be used for the Project.

As stated in the Final EIS Section 4.2.3, some land uses will need to change in order to accommodate the Project; however, impacts to the natural and built environment are minimized whenever possible. Zoning changes are at the discretion of the City's Department of Planning and Permitting.

The Ewa Development Plan recognizes that agricultural land should be protected and designates areas for dense development while preserving other areas for agriculture. The displacement of agricultural lands as a result of the Project represents less than one-tenth of one percent of available agricultural land. The Project's effect will not be substantial and no mitigation will be required.

The 88 acres of prime and statewide important farmlands referenced in Table 4-1 in this Final EIS is limited to the transit project (guideway and associated facilities) and do not include the development of the adjacent properties by other parties. These adjacent properties are designated for development in the Ewa Development Plan.

As discussed in Section 4.19.2, within station areas, the Project, combined with supportive public policies and favorable real estate market conditions, could attract transit-supportive development (TSD) and transit oriented development (TOD). The Ewa Development Plan stresses development in concert with a transit system. Although the addition of transit does not directly cause development to occur, plans and policies will encourage new development to

be located near transit stations to take advantage of the transportation infrastructure and increased accessibility if a new transit line is built.

As stated previously, the Ewa Development Plan recognizes that agricultural land should be protected and designates areas for dense development while preserving other areas for agriculture. The transit system will help focus development in designated areas.

Much of the farmland acreage that could be acquired for the Project is located at one of the two alternatives for a maintenance and storage facility. The preferred alternative is a former Navy fuel storage and delivery facility near Leeward Community College. If it is acquired, agricultural land used for the project will be about 47 acres. The Final EIS identifies the existing land use, and where information is available, planned future use of land that would be affected by the Project.

The agricultural land in question is planned to be developed, independently of the proposed Project. The land is not planned to remain in agricultural use and the impacts of loss of agricultural land have been or are being addressed in the entitlement process for the planned development. The Project has been designed in compliance with the Ewa Development Plan.

Regarding convenience of mass transit, among the Project goals and objectives (Table 1-4 of this Final EIS) is to "improve access to planned development to support City policy to develop a second urban center." The Final EIS shows estimated traffic volumes for year 2030. Traffic is expected to grow with or without the Project being constructed. However, as indicated in Section 3.4.1 of the Final EIS, vehicle miles traveled (VMT), vehicle hours traveled (VHT), and vehicle hours of delay (VHD) are projected to decrease under the Project as compared to the No Build Alternative. VMT is computed by multiplying the forecast number of trips using a roadway by the facility's total length in miles. VHT is derived by multiplying the number of trips using a roadway by the travel time for each travel period. VHD is calculated by finding the difference between the congested VHT and the VHT that would be expected under free-flow conditions. Table 3-14 in the Final EIS shows an 18 percent reduction in VHD with the Project compared to the VHD for the No Build Alternative.

Regarding station access, as indicated in Table 3-20 in this Final EIS, overall access to public transit will be enhanced with the Project. Based on the results of the travel demand forecasting model (described in Section 3.2 of the Final EIS) a substantial portion of project riders will access the system by local bus and by walking and biking to the station. Bus, walk, and bike access to stations will account for approximately 90 percent of total trips in the a.m. peak period, 6 a.m. to 8 a.m.

Several stations will be located near existing or planned bicycle facilities. As stated in Chapter 3, Section 3.4.5, the Oahu Bike Plan is currently being updated and is scheduled to be adopted in 2010. The draft update of the Oahu Bike Plan includes a prioritized list of bicycle projects developed using criteria that includes access to transit. Several projects that would connect existing or future bicycle facilities to rail transit stations are included in the draft update. Additionally, the City will provide parking facilities at four stations (East Kapolei, UH West Oahu, Pearl Highlands, and Aloha Stadium). These stations were selected based on results from the travel demand forecasting model which showed these stations had high drive-to-transit demand.

Regarding the use of mass transit, as presented in Chapter 3 of the Final EIS, the Project will result in reduced VMT, fewer hours of delay, and higher shares of total travel when compared to No Build conditions. As stated in Section 3.4.2 of the Final EIS, approximately 40,000 automobiles are forecast to be removed from roadways as a result of the Project, compared to the No Build Alternative. The specifics of this forecasting model can be found in 3.2.1.

As shown in Figure 3-10 in the Final EIS, the stations on the Ewa end of the corridor will have high daily ridership. It is anticipated that the proposed fixed guideway system will allow development in the Ewa area to occur in an organized fashion around the well-defined transit system. Compact development patterns, better access, and, ultimately, use of the transit system are anticipated. In addition, bus service will be enhanced to provide connections between surrounding communities and fixed guideway stations. All stations will be accessible by bus, walking and bicycling. Future bus routes and frequencies are provided in Appendix D of the Final EIS.

Section 4.19.2 of the Final EIS addresses indirect effects of the Project on development patterns, while cumulative effects are presented in Section 4.19.3, where it is stated: "The bulk of future regional land use changes are expected in the study corridor." Indirect land development would be associated with TOD at the proposed stations, focusing rather than sprawling development. The analysis considers other planned development within the study corridor. Mitigation required to address impacts created by other proposed actions would be the responsibility of those developing the land.

The regional pollutant burdens estimated in Table 4-15 of the Final EIS are based on VMT and VHT estimates throughout the study area. These estimates are based on regional planning models adopted by the OahuMPO. Emission rates are developed through the use of EPA's MOBILE6.2 Emission Factor program which takes into account vehicle mix, speed, meteorological conditions of the study area, and vehicular registration information. The Regional VMT model is reviewed by the State agencies for accuracy. Additional detail is available in the Transportation and Air Quality Technical Reports for the Project. The reports can be reviewed at the City and County of Honolulu Department of Transportation Services (DTS) office or on the Project website (www.honolulutransit.org).

The results shown in Table 4-15 of the Final EIS reflect mobile source emission burdens. As stated in the text, additional emissions will be generated due to the power requirements of the fixed guideway system. Table 4-21 indicates that the Project would require 2 percent less overall energy as compared to the No Build Alternative. The Project is expected to result in decreased emissions generated on the roadways and increased power source emissions resulting from fixed guideway energy consumption. However, the overall emission level for the Project is expected to be lower than the No Build Alternative because of anticipated reduced traffic congestion compared to the No Build Alternative (Section 3.4.2 of the Final EIS).

As summarized in Table 4-21 in the Final EIS, operation of the Project is anticipated to reduce daily transportation energy demand by approximately 3 percent compared to the No Build Alternative. This reduction is due to the reduction in VMT that occurs as a result of people

switching from automobiles to the fixed guideway system and includes electrical energy required to operate the fixed guideway system.

VMT is the sum of the length of all highway segments multiplied by the number of vehicles that travel on them over the course of a day. The travel forecasting model performs that calculation each time the model is run. The differences in VMT between alternatives in the analyses are based on the differences in the numbers generated by the model. The same is generally true for VHT and VHD. VMT, VHT, and VHD forecasts have been developed using the travel demand model, which was calibrated against collected traffic and transit ridership information and then validated against recent counts to be sure it properly represents travel activity in the transportation system (Section 3.2.1 of the Final EIS). An on-board transit survey was completed in December 2005 and January 2006, and the latest socioeconomic information available as of October 2008 was incorporated. Traffic counts were collected in 2005, 2007, and 2008. The model is based upon a set of realistic input assumptions regarding land use and demographic changes, such as updates to population and employment patterns that reflect planned development on Oahu, between now and 2030 and expected transportation levels-of-service on both the highway and public transit system.

In response to your comment, the Final EIS (Section 4.9.3) was revised to remove the following sentence: "Any measures to reduce automobile travel would reduce air pollutant emissions."

Section 4.10 of the Final EIS addresses noise effects of the Project as related to applicable FTA noise criteria. As explained in Section 4.10.1 of the Final EIS, Ldn is an appropriate measure to assess community noise effects, because it considers both the total noise and the daily pattern of the noise experienced and reflects community reaction to environmental noise exposure. Maximum noise levels are not an appropriate measure of urban noise impact, as a single very loud event once a week would have less impact than a quieter event that occurs several times per hour. Leq is used to evaluate noise levels in areas where only the daytime use is noise sensitive. The analysis completed for the Project is consistent with FTA guidance. While Lmax does reflect the maximum noise from a single event, it does not describe either the frequency or duration of the noise event. Lmax is not used in transit noise assessment because it would not differentiate the impact of a single transit vehicle occurring once during the daytime from a constant flow of vehicles occurring over all daytime and nighttime hours.

The Final EIS includes additional information about how any severe noise impacts measured after project operation would be treated. As stated in Section 4.10.3 of the Final EIS, the Project will cause no severe noise impacts. Moderate impacts will occur at upper floors of a few high-rise buildings (as shown in Table 4-18 in the Final EIS). With the recommended mitigation in place (sound absorbing material and wheel skirts), the noise analysis indicates that the new noise generated by the Project will be lower than the existing (2009) noise levels in most locations.

The project design includes an integrated noise-blocking parapet wall at the edge of the guideway structure that extends three feet above the top of the rail. The parapet wall will substantially reduce ground-level noise.

In areas with high-rise apartments and hotels that have lanais above the elevation of and facing the rail, the parapet wall will have a limited benefit (less than a 3-dBA noise reduction) at floors above the level of the guideway. Wheel skirts will increase the benefit from the parapet wall at locations above the elevation of the track. The use of sound-absorptive materials below the tracks in the three areas that will experience moderate noise impacts will reduce the Project noise levels from the upper floors to below the impact level. Once the Project is operating, noise levels will be re-measured to confirm that there are no noise impacts from the Project. If additional noise impacts occur, then FTA will require the evaluation of measures to address the impacts.

The Project does not propose to convert waterbird habitat, including wetlands, into transportation facilities (Section 4.13.3). The Project will stay within existing roadway corridors along most of its route, except sites planned for the maintenance and storage facility and park-and ride lots. These proposed facilities are not located adjacent to any waterbird habitat, including wetlands. Consultation with U.S. Fish and Wildlife Service (USFWS) did not generate any concerns about project effects to habitat as referenced in Appendix F of the Final EIS.

Although this Project did not monitor the noise intensity and duration and other environmental impacts associated with construction of existing facilities near waterbird habitat, we anticipate that the Project will be similar and comparable to the construction effects of the existing facilities, although not equivalent in all aspects at all times. The Project proposes to use drilled-shaft foundations to reduce or eliminate the need for pile driving.

Based on the information provided to FTA by USFWS, coordination with USFWS staff, and field observations, there will be "no effect" to threatened and endangered species or designated critical habitat related to this Project. Areas along the proposed corridor that are in close proximity to waterbird habitat have previously experienced major construction of roads, utility lines, bridges, elevated freeways, buildings, and other existing structures. As summarized in Section 4.13.3 of the Final EIS, there is not expected to be any effect to waterbirds as a result of the Project because it is anticipated that over time, the waterbirds will adjust to new structures. All wetlands will remain intact, and waterbirds continued to occupy the wetlands after the construction and widening of adjacent roads and highways.

Operational noise may generate some disturbance adjacent to the guideway when trains are passing; however, the noise will not be a critical factor in endangered waterbird survival since the quality waterbird habitat will remain intact. The noise levels generated by the Project will be similar to the existing highway-noise levels in the corridor.

The standard error, not the margin of error, of the following parameters was presented in the Honolulu High-Capacity Transit Corridor Project Ecosystems and Natural Resources Technical Report (2008j): the average number of individuals of each species per station and the average number of species per station or average richness for each corridor area. By providing the standard error of the averages and the sample size, we present what is conventionally required in the presentation of averages. From these statistics, one can derive confidence limits for the estimated population parameter, if desired. Further information about methodology is available in this technical report. The report can be reviewed at the DTS office or on the Project

website (www.honolulutransit.org). The standard error ranged between 0.22 and 0.62 for bird count survey results.

The true values of the population parameters will almost always remain unknown and, therefore, it is common to estimate the reliability of the estimated parameter by setting confidence limits to it. There is no way to guarantee that the estimate, such as the average number of zebra doves at each point count station, is accurate. We can only express our degree of confidence in the average as a probability.

Field surveys were observations conducted while walking or driving around. We cannot place confidence limits on such observations since the manner in which the observations were conducted does not lend itself to statistical analyses. The presence and quantity of a species are influenced by many factors such as the time of day, season, and a host of environmental conditions, including the presence of disturbances, such as predators, aircraft, or construction noise, that can cause wildlife to temporarily move out of the area. However, these visits generally reveal what can be expected, based on previous anecdotal and scientific records of similar sites and habitats. They are, therefore, important in verifying and checking the species components and environmental characteristics that typify a site, but conclusions derived from these visits must be interpreted conservatively. Reported observations are accurate.

The design of the point counts was to determine what birds were present along the corridor and provide an index of abundance. Field surveys were designed to record the species observed.

As provided in the Honolulu High-Capacity Transit Corridor Project Ecosystems and Natural Resources Technical Report (RTD 2008j): "White terns may be directly affected by the project between Kalihi to University and Waikiki, because this species uses mature canopy trees as roosting and nesting sites almost exclusively. These trees could be affected by the construction of the fixed guideway system." This report can be found at the DTS office and on the Project website. VanderWerf (2003) indicates that while the white tern population on Oahu is still relatively small and restricted in range, it is increasing and robust. While white tern habitat is limited to large trees in southeastern Oahu, VanderWerf also indicates that if the population grows they may move inland, to other coasts of the island and to other islands. While not as comprehensive, tern sightings during our observations along the corridor show a similar geographic distribution as VanderWerf found in 2001 to 2003. The tern population on Oahu still has area to expand. (Vanderwerf, E.A. 2003. Distribution, abundance, and breeding biology of white terns on Oahu, Hawaii. Wilson Bull., 115(3):258-262.) The only portion of tern habitat that will now be affected by the Project is between Kalihi and Ala Moana Center.

The procedures for all field surveys were presented in Section 3.2. of the Ecosystems and Natural Resources Technical Report (RTD 2008j). Technical Reports can be found at DTS and on the Project website.

Scott, et al. (1986), used an 8-minute count period for their variable circular plot method to estimate bird densities in Hawaiian forests. They determined that the interval was long enough to allow an observer to accurately record all birds observed. The count period was selected as a compromise between efficiency and effectiveness. Point counts by Blondel, et al.

(1981), were conducted for 20 minutes, but as the commenter points out, studies by Dettmers, et al. (1999) (not Bartlet et al.) indicate that 5- or 10-minute intervals are adequate.

Scott, J.M., S. Mountainspring, F.L. Ramsey, C.B. Cameron. 1986. "Forest bird communities of the Hawaiian Islands: their dynamics, ecology, and conservation." Studies in Avian Biology, No. 9.

Blondel, J., C. Ferry, and B. Frochot. 1981. "Point counts with unlimited distance." Studies in Avian Biology, No. 6:414-420. Cooper Ornithological Society.

Dettmers, R., D. A. Buehler, J. G. Bartlett, and N. A. Klaus. 1999. "Influence of point count length and repeated visits on habitat model performance." JWM 63(3):815-823.

Dettmers and Bueher (Dettmers, et al. 1999) stated that the one visit data did not perform as well in their model. "The current point count recommendations also suggest conducting only one visit/point, but we found that models developed from two visits/point consistently performed somewhat better than single visit models across all count durations and species. We concluded that conducting two visits/point will likely result in habitat models that perform better than models developed from a single visit. However, as with count duration, the potential benefits of increased model performance should be weighed against the additional costs in time and resources required to complete extra visits to each point."

During the alternative routes analyses, each route was surveyed once via the modified point count method using 8-minute count periods. After the route was selected, the preferred route was re-sampled using the same method resulting in two samples to determine the presence or absence of species and their relative abundance. Point counts were conducted from 7 a.m. to 11 a.m. All birds heard and seen were recorded, and no aural stimuli were used.

After evaluating the Ground Water Impact Assessment completed for the Project, the Environmental Protection Agency (EPA) concurred that the Project should have no significant impacts on groundwater, either during long-term operation of the system or during its construction. These findings are presented in Section 4.13.3 of the Final EIS. The complete Ground Water Impact Assessment and evaluation of other water resources is available to the public as part of the Honolulu High-Capacity Transit Corridor Project Water Resources Technical Report. This report can be found on the Project website and at the City and County of Honolulu, and the DTS office.

Permanent BMPs will include vegetated swales, retention ponds, and grit removal structures (Section 4.14.3 of the Final EIS). Where it is feasible, an increase in the amount of infiltration of clean water back into the water table aquifer is a design goal.

The Final EIS was revised to clarify the following air pollution statement: "Any measure to reduce automobile travel would reduce air pollutant emissions." Minimal pollutants are anticipated to be generated on the guideway. As shown in Table 4-15, of the Final EIS, the Project will reduce regional transportation pollutant emissions by between 3.9 to 4.6 percent compared to the No Build Alternative. If the electricity used to operate the Project is generated by combustion, this may produce additional emissions. However, these emissions will be offset

in whole or part by the reductions generated by the reduction in transportation emissions, as indicated in Table 4-15. Furthermore, power plant emissions may be more easily controlled than emissions from individual automobiles. Further, as stated in Section 4.11.3, as a result of the decrease in VMT, total transportation energy demand for transit and highway vehicles will be 3 percent lower with the Project when compared to the No Build Alternative. This decrease in energy demand is due to the reduction in VMT that occurs as a result of people switching from automobiles to the fixed guideway system and includes electrical energy required to operate the fixed guideway system. This analysis accounts for both roadway vehicle propulsion energy and power requirements. Based on this, it is expected that the total emission burden generated by the Project will be lower than the No Build Alternative.

For the purposes of the environmental analysis presented in Section 4.14.2 of the Final EIS, the description of the functions of floodplains are limited to their hydrological functions. Section 4.14.2 also acknowledges the habitat functions of the floodplain. The environmental analysis of habitat functions of aquatic resources, including floodplains, is presented in Section 4.13 of the Final EIS.

The Mode Choice Model Calibration and Validation Report includes a more thorough discussion of the model calibration and validation process. This report can be obtained from DTS or on the Project website.

Transit ridership was forecast using a travel demand forecasting model. The model inputs are based on various inputs compiled from empirical information consistent with FTA guidelines. There is no indication that the energy needed by the fixed guideway will exceed the equivalent amount needed to move the same number of people in cars. In general, the fixed guideway will use less than 30 percent per capita of the amount of energy needed to power the number of cars required to carry the same number of people.

As stated previously, ridership projections for the forecast year of 2030 were developed using the travel demand model, which was calibrated against collected traffic and transit ridership information and then validated against current counts to be sure it properly represents travel activity in the transportation system (Section 3.2.1 of the Final EIS). An on-board transit survey was completed in December 2005 and January 2006, and the latest socioeconomic information available as of October 2008 was incorporated. Traffic counts were collected in 2005, 2007, and 2008. The model is based upon a set of realistic input assumptions regarding land use and demographic changes between now and 2030 and expected transportation levels-of-service on both the highway and public transit system. Based upon the model and these key input assumptions, approximately 116,300 trips per day are expected to use the rapid transit system on an average weekday in 2030. Since the Draft EIS was published, the travel demand model has been refined by adding an updated air passenger model (which forecasts travel in the corridor related to passengers arriving or departing at Honolulu International Airport), defining more realistic drive access modes (driving alone or car pooling) to project stations and recognizing a more robust off-peak non-home-based direct demand element (trips that do not originate or end at home) based on travel surveys in Honolulu.

The Project is one of the first in the country to design and undertake an uncertainty analysis of this type of travel forecast. The uncertainty analysis evaluates the variability of the

forecast by establishing likely upper and lower limits of ridership projections. FTA has worked closely with the City during this work effort. A variety of factors were considered in the uncertainty analysis, including the following:

- *Variations in assumptions regarding the magnitude and distribution patterns of future growth in the Ewa end of the corridor.*
- *The impact of various levels of investment in highway infrastructure.*
- *The expected frequency of service provided by the rapid transit system.*
- *Park-and-ride behavior with the new system in place.*
- *The implications on ridership of vehicle and passenger amenities provided by the new guideway vehicles.*

Given all the factors considered, the anticipated limits for guideway ridership in 2030 are expected to be between 105,000 to 130,000 trips per day, bracketing the official forecast of 116,000 riders a day used for all calculations.

Chapter 3 of the Final EIS describes the results of the analysis, and Figures 3-9 and 3-10 show the number of passengers that will be carried by the fixed guideway during the a.m. peak period and daily. Compared to serving the same number of passengers with buses or in cars, there will be fewer vehicles on the road. As discussed in Section 2.5.6, bus service will be enhanced and the bus network will be modified to coordinate with the fixed guideway system. Some existing bus routes, including peak period express buses, will be altered or eliminated to reduce duplication of services provided by the fixed guideway system. Buses removed from service in the study corridor will be shifted to service in other parts of Oahu, resulting in improved transit service islandwide. Certain local routes will be rerouted or reclassified as feeder buses to provide frequent and reliable connections to the nearest fixed guideway station.

According to the U.S. Department of Energy, Transportation Energy Data Book, for the year 2006, passenger cars require 3,512 BTUs per passenger mile while transit trains require 2,784 BTUs per passenger mile, and transit buses require 4,235 BTUs per passenger mile. Based upon these figures, transit trains are a more energy efficient mode of transportation compared to passenger cars or transit buses. These figures are influenced by the load factor (persons per vehicle). The Honolulu system currently has the fourth highest load factor of any transit system in the United States and the highest load factor for any transit system without a rail transit system (Table 3-8 in the Final EIS).

Vehicle efficiency is factored into energy calculations based on overall fleet performance. In general, performance is assumed to improve over time consistent with fleet requirements imposed by federal law or set by individual states.

The Project will rely on Hawaiian Electric Company (HECO)'s existing grid to provide propulsion for the trains and system operations for the trains. HECO is moving toward renewable energy generation. As that happens, the fixed guideway will also benefit from such

new sources of energy. The 21 proposed stations and maintenance and storage facility will, to the extent possible, incorporate energy efficiency, alternative energy technologies, and other sustainable features into the design. This is being accomplished by including sustainability design criteria into the contract documents for the Project.

This list of methods provided in Section 4.12.3 of the Final EIS to limit the volume of hazardous materials used and the extent of worker exposure provides examples of how worker exposure will be limited. In addition, the Project will comply with applicable rules and regulations, such as Occupational Health and Safety Administration (OSHA) and Hawaii Occupational Safety and Health (HIOSH), and workers will be required to comply with material labels.

As stated previously, the preferred location for the maintenance and storage facility is located near Leeward Community College. If that location is used, the impacts to agricultural land will be significantly reduced.

The Alternatives Screening Memorandum (DTS 2006a) recognized the visually sensitive areas in Kakaako and Downtown Honolulu, including the Chinatown, Hawaii Capital, and Thomas Square/Academy of Arts Special Design Districts. To minimize impacts on historic resources, visual aesthetics, and surface traffic, the screening process considered 15 combinations of tunnel, at-grade, or elevated alignments between Iwilei and Ward Avenue. Five different alignments through Downtown Honolulu were advanced for further analysis in the Alternatives Analysis, including an at-grade portion along Hotel Street, a tunnel under King Street, and elevated guideways along Nimitz Highway and Queen Street.

The Alternatives Screening Memorandum (DTS 2006a) recognized the visually sensitive areas in Kakaako and Downtown Honolulu, including the Chinatown, Hawaii Capital, and Thomas Square/Honolulu Academy of Arts Special District. To minimize impacts on historic resources, visual aesthetics, and surface traffic, the screening process considered 15 combinations of tunnel, at-grade, or elevated alignments between Iwilei and Ward Avenue. Five different alignments through Downtown Honolulu were advanced for further analysis in the Alternatives Analysis, including an at-grade portion along Hotel Street, a tunnel under King Street, and elevated guideways along Nimitz Highway and Queen Street (Figure 2-4).

The Alternatives Analysis Report (DTS 2006b) evaluated the alignment alternatives based on transportation and overall benefits, environmental and social impacts, and cost considerations. The report found that an at-grade alignment along Hotel Street would require the acquisition of more parcels and could potentially affect more burial sites than any of the other alternatives considered. The alignment with at-grade operation Downtown and a tunnel under King Street, was not selected because of the environmental effects, such as impacts to cultural resources, reduction of street capacity, and property acquisition requirements of the at-grade and tunnel sections, which would cost an additional $300 million.

The Project's purpose is "to provide high-capacity rapid transit" in the congested east-west travel corridor (see Section 1.7 of the Final EIS). The need for the Project includes improving corridor transit mobility and reliability. The at-grade alignment would not meet the Project's Purpose and Need because it could not satisfy the mobility and reliability objectives of

the Project (see bullets below). Some of the technical considerations associated with an at-grade versus elevated alignment through Downtown Honolulu include the following:

- ***System Capacity, Speed, and Reliability**—The short, 200-foot (or less) blocks in Downtown Honolulu would permanently limit the system to two-car trains to prevent stopped trains from blocking vehicular traffic on cross-streets. Under ideal operational circumstances, the capacity of an at-grade system could reach 4,000 passengers per hour per direction, assuming optimistic five minute headways. Based on travel forecasts, the Project should support approximately 8,000 passengers in the peak hour by 2030. Moreover, the Project can be readily expanded to carry over 25,000 in each direction by reducing the interval between trains (headway) to 90 seconds during the peak period. To reach a comparable system capacity, speed, and reliability, an at-grade alignment would require a fenced, segregated right-of-way that would eliminate all obstacles to the train's passage, such as vehicular, pedestrian, or bicycle crossings. Even with transit signal priority, the at-grade speeds would be slower and less reliable than an elevated guideway. An at-grade system would travel at slower speeds due to the shorter blocks, tight and short radius curves in places within the constrained and congested Downtown street network, the need to obey traffic regulations (e.g., traffic signals), and potential conflicts with other at-grade activity, including cars, bicyclists, and pedestrians. These effects mean longer travel times and far less reliability than a fully grade-separated system. None of these factors affects an elevated rail system. The elevated rail can travel at its own speed any time of the day regardless of weather, traffic, or the need to let cross traffic proceed at intersections.*

- ***Mixed-Traffic Conflicts**— The Project will run at three minute headways. However, three-minute headways with an at-grade system would prevent effective coordination of traffic signals in the delicately balanced signal network in downtown Honolulu. A disruption of traffic signal cycle coordination every three minutes would severely affect traffic flow and capacity of cross-streets. Furthermore, there would be no option to increase the capacity of the at-grade rail system by reducing the headway to 90 seconds, which would only exacerbate the signalization problem. An at-grade system would require removal of two or more existing traffic lanes on affected streets. This effect is significant and would exacerbate congestion. Congestion would not be isolated to the streets that cross the at-grade alignment but, instead, would spread throughout Downtown. The Final EIS shows that the Project's impact on traffic will be isolated and minimal with the elevated rail, and, in fact will reduce system-wide traffic delay by 18 percent compared to the No Build Alternative (Table 3-14 in the Final EIS). The elevated guideway will require no removal of existing through travel lanes, while providing a reliable travel alternative. When traffic slows, or even stops due to congestion or incidents, the elevated rail transit will continue to operate without delay or interruption.*

  An at-grade light rail system with continuous tracks in-street would create major impediments to turning movements, many of which would have to be closed to

eliminate a crash hazard. Even where turning movements are designed to be accommodated, at-grade systems experience potential collision problems. In addition, mixing at-grade fixed guideway vehicles with cars, bicyclists, and pedestrians presents a much higher potential for conflicts compared to grade-separated conditions. Where pedestrian and automobiles cross the tracks in the street network, particularly in areas of high activity (e.g., station areas or intersections), there is a risk of collisions involving trains that does not exist with an elevated system. There is evidence of crashes between trains and cars and trains and pedestrians on other at-grade systems throughout the country (e.g., Phoenix, Houston, LA). This potential would be high in the Chinatown and Downtown neighborhoods, where the number of pedestrians is high and the aging population presents a particular risk.

- ***Construction Impacts***—*Constructing an at-grade rail system could have more effects than an elevated system in a number of ways. The wider and continuous footprint of an at-grade rail system compared to an elevated rail system (which touches the ground only at discrete column foundations, power substations, and station accessways) increases the potential of utility conflicts and impacts to sensitive cultural resources. In addition, the extra roadway lanes utilized by an at-grade system would result in increased congestion or require that additional businesses or homes be taken to widen the roadway through Downtown. Additionally, the duration of short-term construction impacts to the community and environment with an at-grade system would be considerably greater than with an elevated system. Because of differing construction techniques, more lanes would need to be continuously closed for at-grade construction and the closures would last longer than with elevated construction. This would result in a greater disruption to business and residential access, prolonged exposure to construction noise, and traffic impacts.*

Because it is not feasible for an at-grade system through Downtown to move passengers rapidly and reliably without significant detrimental effects on other transportation system elements (e.g., the highway and pedestrian systems, safety, reliability, etc.), an at-grade system would have a negative system-wide impact that would reduce ridership throughout the system. The at-grade system would not meet the Project's Purpose and Need and, therefore, does not require further analysis.

As previously discussed, the Project must operate in a protected right-of-way to preserve system speed and reliability and neither automobiles nor pedestrians can be allowed to cross the tracks. For at-grade operation, this would require a fenced right-of-way with no crossings. Because the City does not intend to acquire the right-of-way through the existing farmlands and future development, and because constructing at-grade and fencing the right-of-way would preclude crossing the tracks, an at-grade system would impair the current use and future development of surrounding lands. Any future crossing of the tracks would have to include construction of a bridge over the tracks.

Areas that are cleared and grubbed will be re-vegetated to the extent possible. This is included in Section 4.18.10 of the Final EIS.

Trees will not be pruned until the young birds have fledged as stated in Section 4.18.8 of the Final EIS.

As presented in Section 4.12.3 of the Final EIS, "The City will decide whether a partial or complete Phase 1 [Environmental Site Assessment (ESA)] is necessary for each property prior to acquisition." The factors that will influence this decision-making process include:

- *Whether the parcel is a full or partial acquisition.*
- *Whether there is existing documentation regarding contamination investigation and/or documentation of remedial activities having occurred.*
- *The degree to which subsurface construction activities will be performed at that individual parcel.*
- *The type of contaminated media that is expected to be encountered.*

Also, archaeological studies will be completed as described in Section 4.16 of the Final EIS.

Sites of concern are listed in Section 4.12 of the Final EIS in Table 4- 22. Some properties that will be acquired to obtain required right-of-way for the Project received a rank of "1" or "2" during the Initial Site Assessment (Table 4-22) and, therefore, may be polluted. Either a partial or complete Phase I Environmental Site Assessment (ESA) will be performed by the City prior to acquiring portions of these properties to lessen the chance that the City will acquire a degraded piece of real estate or that workers will be exposed to contaminants during construction. ESAs will also be performed for those sites listed in Table 4-23. ESAs will be conducted per the ASTM International's Standard Practice for Environmental Site Assessments—Phase I Environmental Site Assessments Process (E1527-05) (ASTM 2005). Site assessments have already begun, are ongoing, and will continue prior to construction of the Project. Depending on the outcome of the Phase I ESAs, a Phase II assessment (including collecting and analyzing samples) may be appropriate. The City will decide whether a partial or complete Phase I ESA is necessary for each property prior to acquisition. If contaminated materials are identified, the property will be remediated in accordance with Federal, State, and Local regulations. The City will coordinate with the HDOT Hazard Evaluation and Environmental Response Office regarding work within HDOT rights-of-way. Specific pre-construction activities regarding contaminated media are discussed in Section 4.18.7 of the Final EIS.

Contractors will be required to prepare a Solid Waste Management Plan to identify procedures to reduce solid waste. Measures to minimize construction waste will be included in the plan prepared by the contractor.

As discussed in Chapter 3, Section 3.2.1, ridership projections for the forecast year of 2030 have been developed using the travel demand model, which was calibrated against collected traffic and transit ridership information and then validated against recent counts to be sure it properly represents travel activity in the transportation system (Section 3.2.1 of the Final

EIS). An on-board transit survey was completed in December 2005 and January 2006, and the latest socioeconomic information available as of October 2008 was incorporated. Traffic counts were collected in 2005, 2007, and 2008. The model is based upon a set of realistic input assumptions regarding land use and demographic changes between now and 2030 and expected transportation levels-of-service on both the highway and public transit system.

The Project is one of the first in the country to design and undertake an uncertainty analysis of this type of travel forecast. The uncertainty analysis evaluates the variability of the forecast by establishing likely upper and lower limits of ridership projections. FTA has worked closely with the City during this work effort. A variety of factors were considered in the uncertainty analysis, including the following:

- *Variations in assumptions regarding the magnitude and distribution patterns of future growth in the Ewa end of the corridor.*
- *The impact of various levels of investment in highway infrastructure.*
- *The expected frequency of service provided by the rapid transit system.*
- *Park-and-ride behavior with the new system in place.*
- *The implications on ridership of vehicle and passenger amenities provided by the new guideway vehicles.*

The FTA-approved forecasting methodology is not a probabilistic analysis and does not inherently provide margins of error.

The Final EIS includes the best available information regarding all resources and effects of the Project.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Honolulu High-Capacity Transit Corridor Project

Welcome to the Honolulu High-Capacity Transit Corridor Project's Public Hearing for the Draft Environmental Impact Statement/Section 4(f) Evaluation.

This public meeting and hearing has been designed to inform the public about the transit project, explain materials contained in the Draft EIS, answer questions from the public, and collect public input on project issues related to the Draft EIS, Section 106 of the National Historic Preservation Act, Section 4(f) of the U.S. Department of Transportation Act, and floodplains affected by the project.

Please review the project information and ask project staff any questions about the project that you might have. The Draft EIS is available on the project website at www.honolulutransit.org.

You may provide official comments in several ways. Here at this Public Hearing you may provide oral comments to a court reporter who will record them for the record or use this form to provide written comments. After the meeting, you may provide an on-line comment at www.honolulutransit.org or use this form to send a written comment to the Department of Transportation Services. All comments must be postmarked or received by January 7, 2009 in order for them to be included in the Final EIS.

Name: Bob KILTHAU Address: 1310 HALOA DR
FOSTER VILLAGE
Honolulu HI 96818

Phone: 422 6149

E-mail: rakaloha@Yahoo.com

Comment(s):

SALT LAKE BLVD IS NOT The best ROUTE !
The Construction Period will Cause Traffic disruption all along S. L. BLVD. & effect Radford HS. & Makalapa Elementary School.
~~operation on the Rail along S.L. BLVD will be~~ effected ~~by noise~~ The schools with Noise.
F.V. & Aliamanu Residentdents will NOT have transit stops. They will have to go to the Stadium to get onboard.
Too much Noise & Congestion !

I wonder why No Politicians showed up for the Salt Lake BLVD meeting: I won't be voting for my Councilman! He should have been at the meeting!

FOLD

Return Address

Place Postage Here

Department of Transportation Services
Attn: Honolulu High-Capacity Transit Corridor Project
City and County of Honolulu
650 South King Street, 3rd Floor
Honolulu, HI, 96813

STAPLE HERE

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, 3RD FLOOR
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Phone: (808) 768-8305 • Fax: (808) 768-4730 • Internet: www.honolulu.gov

MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

May 21, 2010

RT9/09-331794

Mr. Bob Kilthau
1310 Haloa Drive
Honolulu, Hawaii 96818

Dear Mr. Kilthau:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall indentify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address comments regarding the above-referenced submittal:

Your preference for the Airport Alternative has been noted. While each of the alternatives includes trade-offs between benefits and impacts, the Airport Alternative from East Kapolei to Ala Moana Center has been selected as the Preferred Alternative. The identification of the Airport Alternative as the Preferred Alternative was made by the City to comply with FTA's NEPA regulations that state that the Final EIS should focus on the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative, public input on the Draft EIS, and City Council Resolution 08-261 identifying the Airport Alternative as the Project. The selection of the Airport Alternative is described in Chapter 2 of this Final EIS. The discussion of the alternatives considered is included in Chapter 2 of this Final EIS and the Alternatives Analysis. As discussed in Section 3.4.2 of this Final EIS, the Airport Alternative will carry the most passengers with 116,000 daily passengers and 282,500 daily trips in 2030, thereby resulting in the greatest transit-user benefits. The Airport Alternative

will also result in the fewest vehicle miles traveled and vehicle hours of delay, as well as provide access to major employment areas, including Honolulu International Airport, that will have substantially greater ridership than the other alternatives considered.

In addition, a Maintenance of Traffic (MOT) Plan will be developed by the construction contractor with approval from the City and the Hawaii Department of Transportation. The MOT Plan will mitigate construction-related effects on the transportation system. Table 3-27 in the Final EIS identifies roadways that will experience peak-period lane closures during construction.

For schools and other noise-sensitive locations that do not have nighttime sleep activities, the FTA Transit Noise and Vibration Impact Assessment compares the existing maximum-hour noise level to the maximum-hour noise that the transit line will produce by itself. Construction noise will be a temporary impact, and all local noise ordinances will be followed to reduce noise annoyance to residents and schools.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Issuance of the Record of Decision under NEPA and acceptance of the Final EIS by the Governor of the State of Hawaii are the next anticipated actions and will conclude the environmental review process for this Project.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
Creation Date :	1/16/2009
Creator Affiliation :	
First Name :	Jayne
Last Name :	Kim
Business/Organization :	Eki Cyclery
Address :	1603 Dillingham Blvd
Alternative Preference :	
Apt./Suite No. :	
City :	Honolulu
State :	HI
Zip Code :	96817
Email :	eki@aloha.com
Telephone :	808-847-2005
Telephone Extension :	
Add to Mailing List :	Email
Submission Method :	Website
Other Submission Method :	
Submission Date :	01/16/2009

Submission Content/Notes : 1) We are lessees on Kamahameha Schools property on Dillingham and attended the meeting held at KS on 12/18/08. We occupy TMK: 1-5-28:66 and it looks as though a pillar will be right in front of our showroom window. We are wondering if this is correct and if so, can the location of that pillar be revisited? If you move 30-40ft ewa, it would be in front of our bldg wall, and if you move 50-60ft dhead it'll be in front of a parking lot. How big are the pillars?

2) What will visibility be like for motorists as they travel Dillingham looking for businesses? Will they be able to see our current signage? If not, how will the city address this?

3) Our business will be impacted. How much so is anyone's guess. Will we be compensated at all with relief from RPT perhaps? And has this all been figured into the budget?

4) At what point will we be informed as to how much of our front parking lot will be affected? When the BRT talks were in the works, 6 - 7 ft (of our pkg lot to be condemned) was what we were hearing. Will the city be paying for the repaving of our entire parking lot?

5) When the Board of Water Supply dug up Dillingham a few yrs ago, we arrived one morning during the Christmas season to find that they had closed off entry into our parking lot. We hope the city will be more sensitive
to retail businesses on these kinds of issues.

Thank you!

DEPARTMENT OF TRANSPORTATION SERVICES

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-333999

Ms. Jayne Kim
1603 Dillingham Boulevard
Honolulu, Hawaii 96817

Dear Ms. Kim:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

The specific location of support columns along Dillingham Boulevard has not been determined. According to Appendix E of the Final EIS, columns will be 6- to 10-feet in diameter. The exact location for columns will be established during the final design phase of the Project, considering traffic movements, overhead and underground utilities, and other visibility and access issues, such as those expressed by the commenter.

The visibility for motorist along Dillingham Boulevard is illustrated on Figure 4-29 (Viewpoint 10) of the Final EIS. The simulated view shows that the guideway columns will not block the views of businesses or signage as the guideway will be constructed overhead, and the columns will be constructed in the median and spaced at substantial intervals.

As design progresses, we will have a better understanding as to the exact property requirements. If there is an impact to a property, it will be handled in compliance with the requirements of the Federal Uniform Relocation Assistance and Real Property Acquisition Policies Act. If it is an affected parcel, the owner will be notified by the City of the extent of the impact to begin discussions about the appropriate next steps. There are no programs proposed that would reduce property taxes for affected businesses. The Honolulu High-Capacity Transit Corridor Project Right-of-Way team will contact and work with affected property owners and follow the requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act.

Building the Project will have short-term effects on the environment including the business community during the construction phase as discussed in Section 4.18.1 of the Final EIS. As stated in the Final EIS Section 4.18.1, a public involvement plan will be developed prior to construction to inform business owners of the construction schedule and activities. Access may temporarily change during this phase, but access to places of business will be maintained during construction. A Maintenance of Traffic Plan will be developed by the contractor prior to construction and will address temporary effects on access to businesses during construction. Proposed mitigation to reduce adverse economic hardships for existing businesses along the Project alignment during construction activities will be included, see Section 4.18.1 of the Final EIS.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
Creation Date :	11/12/2008
Creator Affiliation :	
First Name :	Young
Last Name :	Kim
Business/Organization :	
Address :	94-536 Lumiauau St.
Apt./Suite No. :	Apt F102
City :	Waipahu
State :	HI
Zip Code :	96797
Email :	ykim001@hawaii.rr.com
Telephone :	671-2566
Telephone Extension :	
Add to Mailing List :	Email
Submission Method :	Website
Other Submission Method :	
Submission Date :	11/12/2008
Submission Content/Notes :	Aloha,

When you look at the route, consider destination rather than origin. Airport, Hickam and Pearl Harbor route has destination and origin without making route changes for buses while Salt Lake route is only the origin. So when the train pulls in to a station with standing room only, would people there ride the train? I doubt that. However, with a bus ride to the airport, they can ride the train comfortably to the destination.

Think about this. What was the primary reason for the mass transit rail? To reduce the traffic from the West side to PUC.

Even though rail was not address in Waipahu Special Area Plan of 1995, I'll support the Airport Route.

Sincerely,

Young Kim, Resident
Waipahu

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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HONOLULU, HAWAII 96813
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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-330436

Mr. Young Kim
94-536 Lumiauau Street
Apartment F102
Waipahu, Hawaii 96797

Dear Mr. Kim:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraph addresses your comments regarding the above-referenced submittal:

Project planning considers both origins and destinations of riders. The numbers of riders that would use each alternative are detailed in Chapter 3 of the Draft EIS. The purpose of the transit project is detailed in Chapter 1 of the Draft EIS. It includes improving travel time, reliability, supporting planned development, and improving travel equity. Your preference for the Airport Alternative has been noted. While each of the alternatives includes trade-offs between benefits and impacts, the Airport Alternative from East Kapolei to Ala Moana Center has been selected as the Preferred Alternative. The identification of the Airport Alternative as the Preferred Alternative was made by the City to comply with FTA's NEPA regulations that state that the Final EIS should focus on the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative, public input on the Draft EIS, and City Council Resolution 08-261 identifying the Airport Alternative as the Project. The selection of the Airport Alternative is described in Chapter 2 of this Final EIS. The

discussion of the alternatives considered is included in Chapter 2 of this Final EIS and the Alternatives Analysis. As discussed in Section 3.4.2 of this Final EIS, the Airport Alternative will carry the most passengers with 116,000 daily passengers and 282,500 daily trips in 2030, thereby resulting in the greatest transit-user benefits. The Airport Alternative will also result in the fewest vehicle miles traveled and vehicle hours of delay, as well as provide access to major employment areas, including Honolulu International Airport, that will have substantially greater ridership than the other alternatives considered.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
Creation Date :	11/24/2008
Creator Affiliation :	
First Name :	David
Last Name :	Kimball
Business/Organization :	University of Hawaii
Address :	
Alternative Preference :	Neither
Apt./Suite No. :	
City :	Honolulu
State :	HI
Zip Code :	96822
Email :	dkimball@hawaii.edu
Telephone :	
Telephone Extension :	
Add to Mailing List :	None
Submission Method :	Website
Other Submission Method :	
Submission Date :	11/24/2008
Submission Content/Notes :	Hopefully this has been considered, or is being considered as an option. To have the rail run through Salt Lake, but with a spur down through Mapunapuna to service the airport? The Salt Lake route will cost less, and service the locals. The spur will service locals and the visitors. Of course getting the visitors into Waikiki w/out them having to pick up a car at the airport will have great results in reducing the number of cars in H1.

DEPARTMENT OF TRANSPORTATION SERVICES

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-330789

Mr. David Kimball
dkimball@hawaii.edu

Dear Mr. Kimball:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraph addresses your comments regarding the above-referenced submittal:

The proposed option was described in the Draft EIS as a construction phasing option for the Airport and Salt Lake Alternatives. While each of the alternatives discussed in the Draft EIS includes trade-offs between benefits and impacts, the Airport Alternative from East Kapolei to Ala Moana has been selected as the Preferred Alternative as described above. As compared to the alternatives discussed in the Draft EIS, the Airport Alternative will carry the most passengers, provide the greatest transit-user benefits, and result in the fewest vehicle hours of delay. It will provide access to employment centers at Pearl Harbor Naval Base and Honolulu International Airport and will serve the Salt Lake neighborhood with connecting bus service. Of the three Build Alternatives addressed in the Draft EIS, the Airport Alternative will have slightly less impacts to the natural and built environment analyzed in the Draft EIS. During the public comment period on the Draft EIS, the public overwhelmingly supported the Airport Alternative. Of the comments that specifically supported one of the alternatives, more than 75 percent were in support of the Airport Alternative. For more information this selection is discussed in Section

2.4 of the Final EIS. Since publication of the Draft EIS, design has been advanced, further analysis has been completed, and information has been added in response to comments on the Draft EIS and agency coordination. The Final EIS discusses the process that was used to select the Preferred Alternative, how comments were considered in the decision-making process, impacts and mitigation commitments.

The FTA and DTS appreciate your interest in the Project. The Final EIS has been issued in conjunction with the distribution of this letter. You may view the Final EIS on the Project website at www.honolulutransit.org. You may request a DVD of the Final EIS and additional content through the "Contact Us" tab on the website or by calling the Project hotline at 566-2299. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

To: Honolulu C&C Dept. of Transportation Services Mon., Dec. 8, 2008
For: Draft EIS Public Hearing at Blaisdell Exhibition Hall
From: Amy Y. Kimura

Good evening. I testify tonight as an ordinary citizen who rides public transit wherever I've lived and traveled and who likes it for the most part. I enjoyed commuting on the subways in New York City and Japan. As a traveler I've ridden on the trains and buses in Europe, Canada, and the U.S. I list these because many people think everyone who is against the proposed Honolulu rail dislikes mass transit, rail in particular. On the contrary, rail in the places I've used them has been fast, convenient, efficient, and usually reasonably priced. But the populations served by them have been from two times to more than ten times Honolulu's population and could more easily support their operation and maintenance.

One place it was not so reasonably priced was Vancouver, Canada. The Skytrain was clean, convenient, and efficient, but way more expensive than Honolulu's bus system. A MONTHLY ADULT PASS cost $73-136, depending on the number of zones covered. That's about two to three times the $40 cost here. What would that do to transit-dependent riders here, people with no auto?

In Vancouver the MONTHLY PASS FOR SENIORS is $42, more than the YEARLY cost of $30 for seniors in Honolulu. What would that kind of cost do to seniors on limited and moderate incomes?

For students, monthly passes in Vancouver are also $42, twice as much as the $20/month charged by The Bus.

"Transit-dependent" adult riders, the elderly, and children will be greatly affected. Will the City be willing and able to greatly increase its subsidy of transit to keep down the prices of the transit passes for them?

If not, how will that affect the quality of life of seniors of moderate or limited means? How about families of low, moderate, and even middle incomes?

If not, how will that attract motorists out of their cars and on to the fixed guideway?

If yes, how will that affect property tax rates of everyone?

If commuter passes increase in price, the "Choice Riders" of The Bus, those who have an available vehicle to ride but choose to ride The Bus, will likely choose to abandon commuting on public transit in favor of their car, adding to congestion.

Mahalo for giving me this opportunity to comment. In the future more notice would be appreciated. I received your newsletter announcing this hearing three days ago, on Friday, Dec. 5.

Amy Y. Kimura

RECEIVED
Dec 29 2008
PB Americas INC.
HAWAII

from Ralph Rosenberg Court Reporters
Dc#4227-R

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-332510

Ms. Amy Kimura
1310 Heulu Street, #1002
Honolulu, Hawaii 96822

Dear Ms. Kimura:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

The corridor from Kapolei to UH Manoa (i.e., the study corridor) is well suited for the fixed guideway project. In 2000, 63 percent of Oahu's population of 876,200 and 80 percent of its 501,100 jobs were located within the study corridor. By 2030, these distributions will increase to 69 percent of the population and 83 percent of the employment as development continues to be concentrated into the Primary Urban Corridor and Ewa Development Plan areas. As stated in Section 1.3.1 of the Final EIS, 2,036,000 or 73 percent of the approximately 2,790,000 island-wide daily trips, and 350,000 or 64 percent of the 544,000 a.m. peak-period work-related trips, are currently generated within the study corridor. The study corridor attracts an even higher percentage of island-wide work-related trips with 446,000 or 82 percent of a.m. peak-period work-related trips having destinations within the study corridor.

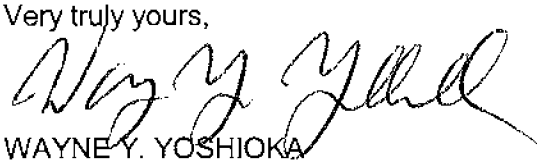
The EIS assumes that fares for all transit modes, including the fixed guideway line and TheBus will be the same, with a fare structure similar to today. Zone fares or distance-based fares are not assumed. The EIS also assumes that the City's current policy will remain in effect (i.e., that fare revenues will pay for between 27 and 33 percent of annual operating and maintenance costs).

As described in Section 6.4.2 of the Final EIS, "The fare structure for the fixed guideway is assumed to follow the current bus fare structure, with transfers between modes assumed to be free." Current users of the TheBus with its fare structure for limited income populations will be able to transfer onto or directly access the fixed guideway system with their current bus passes or one-way fare. Since the fare structure is assumed to be the same and that transit-dependent households will experience a substantial time benefit (as shown in Figure 3-7 of the Final EIS), the combination of a consistent fare structure across modes coupled with a decrease in travel time is anticipated to attract motorists out of their cars. Fares are anticipated to increase with inflation and the cost of automobile ownership, and use is anticipated to increase at or above the rate of general inflation.

Chapter 6 of the Final EIS describes the financial resources anticipated to be needed to pay for ongoing operating and maintenance costs. Operating and maintenance costs will be paid for from the same sources currently used for TheBus: Federal funding, fare revenues, and subsidies from the City's General and Highway Funds. It is anticipated that with an integrated bus and rail system in place that a slightly higher percentage of the City's operating budget will be used for transit than is currently the case.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,



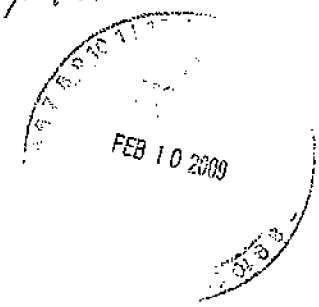
WAYNE Y. YOSHIOKA
Director

Enclosure

To: Mr. Wayne Y. Yoshioka
Department of Transportation Services
City and County of Honolulu
650 South King Street, 3rd Floor
Honolulu, HI 96813
808-768-8303

From: Amy Y. Kimura
1310 Heulu St., Apt. 1002
Honolulu, HI 96822

Amy Y. Kimura



Subject: Honolulu High-Capacity Transit Corridor Project
City and Count of Honolulu, O'ahu, Hawai'i
Draft Environmental Impact Statement/Section 4(f) Evaluation

C: ✓ Mr. Ted Matley
FTA Region IX
201 Mission Street, Suite 1650
San Francisco, CA 94105
415-744-3133

The following are my comments on the Draft EIS due February 6, 2009. I recommend a Supplemental EIS be prepared before the Final EIS to adequately answer my and others' questions and comments.

CHAPTER 1 PURPOSE AND NEED FOR RAIL PROJECT

A. REDUCE CONGESTION INTO URBAN HONOLULU At the beginning of this process the public was told the major reason for the project was to **reduce congestion**, particularly from Leeward and Central O'ahu. As a n urban Honolulu resident I was usually not affected by this daily problem. However, on those few occasions when I found myself in it, it mada me very sympathetic to their plight. I believe the City and its consultants have given short shrift to investing in an improved bus system that would reduce congestion for leeward O'ahu motorists at least as much as the rail system and much sooner and at vastly less cost to O'ahu taxpayers.

B. DIRECT FUTURE GROWTH. The other major reason discussed, one espoused by many on the City Council, was as a planning tool, to **direct future growth** toward the Second City of Kapolei. This made sense to me. I recalled Stockholm, where at rail stations there was high density: high rises with commercial spaces on the low floors, residential on the upper floors, often for the elderly. Radiating from the station were first lower density town houses and low rise apartments, then farthest away, starting perhaps from one-third or one-half mile were single-family houses. Bicycle and pedestrian paths connected with the stations without crossing a street. It was safe and well-planned, with a mixture of family types and families easily accessible to elderly parents. Each station was a little neighborhood where you didn't have to drive to take care of daily activities and needs, as is common in Japan and in New York City. But this is not what I see being planned for the first few stations being built.

C. FARFETCHED STATEMENTS BY CITY IN FAVOR OF RAIL

1. "Rail transit is a way to...provide options for those who cannot easily drive to, or park at, their destinations." [Hnl rail transit insert Advertiser and Star-Bulletin Sun-10-19-08] .

Why provide an option at such a high cost for the next 20-30 years when it will do little to alleviate traffic from Leeward O'ahu (only 11% according to the City's rosy estimates) ? The City should not be

AR00002279

mortgaging the taxpayers' future for something with such a small benefit and so risky . At a minimum it should exhaust other, less expensive, less risky, and less disruptive options like greatly improved express bus service The City should act prudently, not be gambling with present and future taxpayers' funds

2. "Goal: Improved Equity" "Everyone can use the fixed guideway system and **afford it**." (Honolulu On The Move Newsletter, Feb. 2008, p. 1)

How is it possible that bus passes and fares will not increase with rail added? How can the rail be built and added costs of operating and maintaining the rail in addition to the bus system not require higher fares?

The current $40/month adult bus pass is affordable for households with limited incomes and/or no car The $30/YEAR (not month) senior pass is an outstanding bargain! Nowhere in the US or Canada have I come across such a bargain for seniors. This incredible bargain offers great mobility and a high quality of life to seniors with limited income and those unable to drive. My late mother made good use of it.

3a. Improve Corridor Mobility. (1.8.1).

Decreasing congestion into Honolulu and the Central Business District can be achieved much more economically than with a multi-billion rail by the City (and State) increasing monthly employee parking rates (e.g. $60) in the CBD to closer to private rates downtown ($200+). This would encourage more carpooling and bus riding [but bus service must be improved to attract "Choice Riders"]. The City and State would probably have to negotiate this with the unions, but it would be much easier on the public and not disruptive to businesses along the route than constructing the rail system.

3b. "Motorists and transit users experience substantial traffic congestion and delay at most times of the day, both on weekdays and on weekends." (1.8.1)

During peak hours I agree, but **in the off-peak hours or on weekends I haven't found this in 10-15 years** of occasional driving to Waikele/Waipahu/Pearl Ridge/Pearl City from Makiki. Nor have I found this when often driving around Kalihi and Iwilei in offpeak hours. In the 90s when I used to drive to Pearl City during the morning peak period, it usually took me 10 minutes longer than in the best off-peak times. But driving back during the am peak period took an hour longer, so I learned to delay returning because I was lucky enough to have a choice most of the time.

4. "A need exists to provide a more reliable transit system." (1.8.2)

I agree, but this can be done with an improved bus system that will cost a fraction of the rail and will not be disruptive during construction nor take away parts of people's land.

5. Improve Transportation Equity (1.8.4) "Downtown median daily parking rates are the highest among U.S. cities, further limiting this [transit-dependent and lower-income workers from Pearl City, Waipahu, and Makakilo areas] population's access to Downtown."

Why would high Downtown median daily parking rates affect the transit-dependent and those without cars?

D. ALTERNATIVES INADEQUATELY EXPLORED. Mayor Hannemann and the City's consultants have **not explored alternatives adequately.** They have given short shrift to a bus and Transportation Systems Managament alternatives. What I've read and heard at public meetings and hearings indicates the Managed Lane Alternative has also not been given a fair examination. When the mayor ran for office he often said the City has Needs and Wants. He would focus on the Needs before the

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Wants I believe the rail project is a Want, not a Need. Our Needs include at leest one billion dollars to bring our aging sewer system up to minimum Federal standards now that repeated waivers over the past 15-20 yearshave run out. A Federal court has ordered the City to do so U.S. Senator Daniel Inouye is trying to use his influence to grant us an exception because he said the City cannot afford to pay for it. Yet Senator Inouye feels we can afford a much more costly five billion dollar rail system that is a Want, not a Need.

E. WHO WILL NOT BE BETTER SERVED BY THE RAIL SYSTEM?

1. **Urban Honolulu** (and Central Business District) **residents** are currently well served by the low-fare bus system, especially those without cars. They will not benefit from the proposed rail system. On the contrary , they will have poorer bus service because many bus routes from one part of Honolulu to another part will be diverted to feed the rail stations

2. **The elderly, people of limited income, and the disabled** are best served by buses because of the low-cost fares, nearness to origins and destinations, security due to the presence of a driver on every bus, and safety because the driver waits until the elder and handicapped are on board or safely on the ground before closing the door and moving on.

3. **UHM/Chaminade/St. Louis students** because the Minimum Operating Segment will not go to UHM/Chaminade/St. Louis. Commuters from Leeward and Central O'ahu usually remark on how much less traffic there is when UH is not in session, that there really is little congestion. This contradicts the assertion that "The Project would ...meet the Purpose and Need for the Project whether or not the planned extensions are provided." [Project Phasing, p. 2-38]

4. **O'ahu taxpayers** will be spared the traffic congestion during the ten-year construction period, the much higher property taxes and GET surcharge increase necessary to build, operate, and maintain the train, and the inability to afford both rail and core city services like sewers.

5. **Tourists** will not like the visual blight created by an elevated line (this is supposed to be "paradise") and go elsewhere, affecting the state and city economy and the revenues for the 1/2% GET surcharge as well as the Tourist Accommodation Tax.

6. **Leeward O'ahu residents,** last, but most importantly, who do need relief from peak period congestion Unfortunately, the rail will not provide that relief as I will argue in my comments. They have been misled into believing that their severe rush hour congestion affecting their quality of life will be eased when the MOS is completed in ten or so years.

CHAPTER 2 ALTERNATIVES CONSIDERED

A. NO BUILD (BUS SYSTEM), TRANSPORTATION SYSTEMS MANAGEMENT (TSM)

Express buses are tremendously more cost-effective than a multi-billion dollar fixed rail. Express buses use roadways used by cars and other buses and thus will not cause more congestion during a decade of construction as the guideway must, which can cause small and even medium-sized businesses to go under. They do not require condemnation of land for their stops.

1. **Improve express bus service from Leeward O'ahu.** It is the Leeward (and Central) O'ahu areas which are most in need of relief from rush hour congestion. I feel not enough thinking outside the

box has been done by TheBus decision makers. More express buses, especially during the morning peak period, could fill this need better and at much lower cost than a rail system. More luxurious coach-type buses should be tested to see what brand best meets commuters' needs. Most of them should be super express buses, which only pick up passengers in the originating area and only drop off in destination areas.

Example: Improve Wai'anae-Honolulu express buses. For example, Waianae super express buses should drive straight to town without stopping at Waipahu or any other place en route to the destination in, say, the CBD or Waikiki or UHM. This would minimize riding time for everyone on the bus. The bus should have upholstered seats such as tourist coaches have or long distance buses on the mainland have. I've ridden on inter-state Greyhound buses that have spacious Business Class size reclining seats like those on jet planes, with a pull-down tray-table, individual lights and air jets. The buses have a toilet on board. Riders would be able to read, use a laptop, sleep, and even eat. So even if the bus is stuck in traffic, the rider can use the time productively and in comfort.

Example: Improve Kapolei-Honolulu express buses. To minimize time spent riding and maximize space on them, express buses should stop only for pickups (no dropoffs) in Origin areas. They should allow only dropoffs (no pickups) in Destination areas. This is done elsewhere though not here. The number of Origin and Destination areas served can be determined partly by survey, partly by trial-and-error after establishing initial service. For example, whether it should include Downtown en route to UHM or Downtown and Ala Moana en route to Waikiki would depend on the number of riders to the different areas and availability of buses.

2. **More than five minutes late is "Late" for express buses (1.5.3).** Express buses are on average more than five minutes late 30% of the time. (p1-19) This definition of "late" is unduly strict and doesn't make sense to me. When I drive or ride the bus, I consider a 5-10 minute leeway normal, not late. Only in Switzerland or Japan with their famed punctuality would this be a reasonable definition; not in the US or elsewhere in Europe. Fifteen minutes would be "late" for the bus or when I drive.

3. **TheBus serves urban residents well.** Ninety-five percent of the urban population lives within one-quarter mile of a bus stop. The urban population is well served by the present bus system.

This DEIS contradicts itself when it states (p.2-9, col. 2) , "Transit service levels... would remain about the same as they are today." And then it says (p. 2-24), Some bus routes including peak period express buses would be altered or eliminated. Certain local routes would be re-routed or reclassified as feeder buses.

This is not possible if feeder buses must be diverted to transit stations to meet trains every three to six minutes and the fleet would be about the same whether the rail is built or not.

4. **Apply traffic signal priorty for buses now.** Traffic signal priority would be given to buses during the morning peak period when the rail is built. This can be done without rail to improve the express buses' times. Trial-and-error can be used to determine the intersections with bus traffic signal priority very inexpensively compared to building and operating rail.

5. **Transfers to/from rail discourage "Choice Riders."** The rail stations will not be within easy walking distance of most potential riders' homes. People will find, as I did, that transfers from bus to rail and vice versa are time-consuming and a deterrent to riding the rail if you have an alternative.

Example: Yokohama. My actual ride on the subway train was about 11 minutes. But I allowed 60 minutes for my trip because there was a 5-minute walk from my apartment to the bus stop; a 5-10 minute

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wait for the bus; 10-15 minute bus ride; 5-minute walk from the bus to the subway platform; 1-4 minute wait for the train; 11 minutes on the train; an 8-10 minute walk from the platform to my final destination. On the days when I had no wait times, it would take 40 minutes; on other days when I barely missed the bus and subway, it would take 55-60 minutes. I had no car and no choice but to ride public transit in Yokohama. I do not ride bicycles, so that was not an alternative.

6. **Buses can stop close to home and work/school.** Express buses can come close to riders' homes and destinations, making transfers unnecessary. What's most important is door-to-door time, not the time on one leg of your commute. If you can settle in for 40 minutes or so on a seat, you can read, text, work on your laptop, or sleep, activities one cannot do comfortably when transferring from one transit mode to another.

7. **Elderly and disabled prefer buses.** The elderly and disabled generally prefer buses because stops are closer to their homes and destinations, requiring less walking. They feel safer because they know there's a live, alert person always on the bus, its operator. They know that operator will wait for them to get on and get off before moving the bus so they're less likely to fall.

8. **Tourists.** They generally add little to the am peak period congestion from Leeward and Central O'ahu because most of them stay in Waikiki, and the trips they take by bus or car are usually against traffic.

9. **Fallacy: TSM more polluting and energy inefficient than rail.** The Alternatives Analysis concluded that TSM would have required more transportation system energy and generated more air and water pollution than the fixed guideway alternative. I believe this statement does not take into account improvements in hybrid and electric vehicles occurring now. By the time the Minimum Operating Segment of the rail is completed in ten years, electric buses powered by non-polluting electricity produced sustainably by sun, wind, ocean wave, or ocean thermal will be available . It will be much cheaper and simpler to incrementally phase in these kinds of low polluting buses than replacing the third rail providing the power for 50-60 steel-on-steel railcars . The technology to replace the third rail and cars or retrofit the cars we've purchased could be 20-50 years in the future, keeping us more oil-dependent far longer than with buses.

B. BICYCLES AS ALTERNATIVE SUPPLEMENTAL TRANSPORTATION

1. **Dismissed with little real consideration in public documents/meetings** During the public hearings and meetings on the fixed guideway, bicycles were dismissed. This dismissive attitude keeps bicycles from being more widely used as transportation for short and medium distances. The present setup in urban Honolulu certainly discourages all but the most determined and daring from riding a bicycle because they must compete with cars and other much larger motor vehicles whose drivers often give the defenseless rider no respect. Yet in Europe they are widely used by all ages and for trips that an American would hop in the car to do.

Example: Copenhagen. In the 1970s I was at first puzzled at the double sidewalks in the area I spent as a tourist. When I saw bicycle riders on the lower sidewalk closer to the street and pedestrians on the higher sidewalk farther away from the street, I realized what they were. I recall being amazed at sights I never saw in the US: an elderly, plump, white-haired woman dressed in nice clothing and wearing a small hat and dressy shoes, was riding a bike on a Sunday morning near the centruum, the town square, apparently on her way to or from church. Then I saw a young couple ride past, the man with two small children on his bike, the woman with what looked like picnic things on her bike, apparently heading for a picnic. Wow, I thought, when riding a bicycle is made safe enough, a lot more people will do so. I hardly expect us here to do what the Danes do, but with Hawai'i's mild year-round climate, we could easily

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encourage more bicycle commuting and traveling

2. Year-round climate for bicycles. With our vaunted perfect weather for bicycles and the relative short distances we can travel on a small island, bicycles are a perfect vehicle for many college students who cannot afford a car, who are young and fit, and who live short distances from campus. This would allow campus parking lots to be smaller and create less air pollution on campus. Many urban residents who live and work/attend school in town would ride a bike to work/school if it were safe to do so. This could reduce local traffic, making bottlenecks near and in town clear more quickly, helping Leeward and Central commuters.

3. Bikes on TheBus, Pearl Harbor bike path. The City must be given credit for allowing two or three bikes on the front of TheBus. There is a bike/pedestrian path from Pearl Harbor to Pearl City which is completely separated from auto traffic. There should be more like it, connecting Leeward O'ahu to urban Honolulu to give an option to those most in need of relief from congestion This would allow the fit and would-be fit to use this mode.

4. City bicycle budget miniscule. If the City were to spend three percent of its roadway budget on bike paths/bikeways/bike facilities, it would be infusing a huge increase in funds. Improved riding for bike commuters would make us less dependent on oil, reduce the size of parking lots needed by businesses and government, and improve the bike riders' weight and health . But the City has placed a much higher priority on roadways and street parking for motorists, spending a pittance on encouraging transportation by bicycling. It is very reluctant to reduce street parking for safer bike lanes. The City has generally treated bike riding as a recreational pasttime. For example, around the Waikiki Zoo there is a paved path for bikes alongside the pedestrian path thatdoes not share the road with autos. It's where I sometimes see children and parents riding on their bikes

5. Bicycles environmentally friendly. Bicycles represent a tremendous potential for quickly reducing importing our transportation fuel should there be an oil embargo or gasoline goes up to $5-$8 a gallon. Little unfamiliar or expensive infrastructure needs to be built. Land does not need to be taken from food production. There are no unsightly land-hogging windmills to be erected. No expensive underground cables need be built.

Together with an improved bus system and more shade trees to encouraging walking short distances, bicycles are part of an affordable, more sustainable, more energy independent future for O'ahu's commuters and residents.

PROBLEMS WITH RAIL

A. RAIL FUNDING PROBLEMS

1. By law, dedicated local funding cannot be used for buses or highways. State law does not allow the funds from the one-half percent GET surcharge to be used for other than a fixed guideway system (2-5). The Draft EIS does admit that, "Variables like tourism spending and retail sales could materially impact the net GET surcharge revenues available to fund the Project." (p. 6-11)

a. The **serious recession** the state, country and world are in is causing leading state legislators and the Governor to reconsider the fund's use or to suspend collecting it until the economy improves. Senate President Colleen Hanabusa and Governor Linda Lingle are both now considering using it for other state needs because of serious budget shortfalls.

If this dedicated funding source is the "only source of funding until FY2012, " what will happen if the State decides next year to either suspend its collection or allow it to be used for other more immediate needs?

b. The City's **other main sources of revenue are** property taxes and its share of a state Transient Accommodation Tax (tourist tax). But property values on O'ahu have plummeted in the past year, and tourism is in a deep and worsening slump. Economists are predicting tough times for the next few years

2. **City Council's weakening position on rail.** The large majority of seven favoring a fixed guideway in the early stages dropped to a bare majority of five when UHM was left out of the MOS. One of that five no longer favors the rail after last month's vote to select the Airport route instead of a Salt Lake or Salt Lake/Airport route.

B. RAIL ROUTE PROBLEMS

1. **Failure to include UHManoa in the MOS will cause minimal reduction in congestion and large reduction in potential ridership** Without including UHM in the Minimum Operating Segment, there will be no significant impact on peak am congestion. Letters to the editor of both dailies have confirmed what my relatives, friends, and acquaintances have said: how little traffic congestion there is when UHM is not in session. Even with UHM/Chaminade I have doubts that our island population is large enough to support a rail system. All the successful rail systems that I'm familiar with serve populations of at least two million, usually more. Without UHM it will become a white elephant because farebox revenues will be far too low to cover the 27-33% users' share of operating costs required. Raising fares will cause a drop in ridership and revenues. Naturally it will cost much more to operate and maintain a rail and bus system than a bus system alone.

2. **Leeward Comunity College station.** Is there a station at Leeward Community College? If not,what is the reasont? Because community colleges have much lower tuition than UHM, Chaminade, or HPU, many cost-conscious students elect to attend a community college for the first two years before transferring elsewhere. They should be easily accessible by public transit so people without cars can attend. During the public information sessions I did not study the station locations in the areas I was not familiar with; I assumed, perhaps incorrectly, that LCC would be served. (p 2-26)

C. RESTROOMS AT STATIONS

Where are they shown or described in the DEIS? There MUST be restrooms in every station. I saw no mention in the verbal descriptions nor could I find any in the figures I looked at. If there are restrooms in every station that should have been made much clearer in this DEIS. If not every station is to have a restroom, that should be made absolutely clear in a Supplemental EIS.

Young Children need them. Any mother with a young child knows that when they say they need to go, you'd better find a restroom quickly in the station or they'll relieve themselves on the platform or against a wall in the station. When this happens on the bus, you get off at the next stop and find a bush or the gutter if no suitable place can be found in time. Odors are more quickly dissipated at a bus stop than in a train station.

Elderly. The elderly often need to relieve themselves much more frequently than younger people. Elderly men, who often have prostate conditions and cannot hold it, will do so on the platform or elsewhere in the station against a wall if there is no restroom at the station. This will create a smelly, unpleasant atmosphere for others. Maintenance costs will be much higher than if restrooms were provided to begin with.

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D. RAIL REVENUE PROBLEM : FARES SEVERELY UNDERESTIMATED, REVENUES OVERESTIMATED

1. Fares severely underestimated. Rail fares have been severely underestimated. In public meetings the mayor has repeatedly said it would be the same as it is now, $2.00 a ride. This le obviously not possible, even adjusting for inflation, when there are huge capital costs to construct the project. And of necessity operating and maintenance costs will be higher for a rail plus bus system than a bus system alone, again even adjusting for inflation. The DEIS admits that "...riders' price sensitivity could decrease ridership..."

Example: Vancouver (Canada) fares 2-4 times TheBus's. [Note: Fares are from its website in 2008. It's unclear if dollars are US or Canadian.]

Look at Vancouver, which has a steel-on-steel automated rail system plus a bus system While the monthly adult pass on O'ahu costs $40 and covers the whole island 24/7, in Vancouver it's $73, $99, and $136 for one-, two-, or three-zones. If Honolulu used Vancouver's zone system, one zone might be urban Honolulu (from Salt Lake to Hawai'i Kai); two zones might include Ewa, Kapolei, Waipahu, Pearl City, Kailua, Kane'ohe, and Waimanalo; three zones would include the entire island. How would fares like Vancouver's impact the limited and moderate income, even the middle income working adult?

If O'ahu **adults** had to pay the equivalent of Vancouver's fares to commute to work, most of the Choice Riders would switch to their car because it would be cheaper, adding to congestion. Some of the Transit-Dependent riders of limited and even moderate incomes might become homeless due to the high cost of getting to work

For **children** it's $20 for the monthly pass. In Vancouver it's twice as much, $42/month, the same as for seniors there. If children's fares are not reasonably priced, parents may then begin driving them, adding to congestion and defeating a major purpose of rail transit.

For **seniors**, it's a superbargain $30/YEAR, or $2.50/month pro-rated. Seniors may use this pass 24/7 In Vancouver, it's $42/MONTH, more than it costs for one year on O'ahu.

Individual senior fares are $1.00 with a Medicare card; in Vancouver a 10-ride card costs $16.00, or $1.60/ride

2. Seniors' quality of life lowered with higher bus fare/pass. Their superbargain fares will be gone. The necessary higher fares due to additional costs of building the rail, operating and maintaining it in addition to the bus system will impact especially limited income households and the transit-dependent with no household car. Most of these are in urban Honolulu and are better served by the bus system. Seniors all over who use the bus will be impacted by a necessarily higher fare. Many will choose to not purchase a much more expensive pass, thereby decreasing their mobility and quality of life. Few seniors are aware how much higher their fares would be with rail

3. "Choice Riders" will choose auto When the rail is completed in ten years the necessary **high cost rail transit passes/fares will deter transit-optional riders, whose loss will lower expected farebox revenues and whose shifting to auto will add to congestion during peak period traffic..**

Choice Riders, thoae who ride the bus but have access to a car, are 29-35% or bus riders according to the Bus Survey. High fares, loss of direct bus routes between home and work in urban Honolulu, and

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inconvenient transfers due to diverting buses in urban Honolulu to feeder lines to the rail stations will result in loss of some of these transit riders, reducing revenue.

4. **Inadequate parking at stations will reduce ridership.** The lots to be built at East Kapolei and several of the suburban stations allow for only one-third of the estimated morning peak period commuters to park. An optimistic estimate would be one-third will walk, ride a feeder bus, ride a bicycle, or be dropped off. What will the other one-third do? They will drive to work/school, adding to road congestion and decreasing operating revenues.

5. **Unrealistic headway frequencies produce overly high rider capacity estimates.** When I was a commuter in Yokohama, with a population at least three to four times Honolulu's, the rush hour headway was more like four minutes. Thus, the peak hour load trains here would carry is overestimated because there will be 12-13 trains per hour instead of 17-18 per hour in one direction. In New York City outside of Manhattan, headways during rush hours were at least five minutes.

(The six-minute and ten-minute headways at off-peak and night times are also unrealistic. In Yokohama they ran about six to ten minutes off-peak on weekdays and about 12-15 minutes on weekends. In New York City where I was a commuter many years ago and still use the subway on more recent visits, the night and weekend trains often run every 20 minutes, depending on which train you're taking. Running them less frequently should reduce operating costs a little and is not likely to have much effect on the weekend and late night ridership)

E. RAIL OPERATION PROBLEMS: SAFETY, SECURITY

1. **Station parking lots at night are unsafe for women, elderly.** Walking to one's car at night after working late could be unsafe for women and the elderly because they would be good places for would-be robbers/rapists to lie in wait for vulnerable victims.

2. **Automatic driverless trains should not be considered.**

a. Without an operator/driver like Vancouver, women and elderly will be easy prey at night

b They encourage **crime.** At night empty cars willt attract graffiti , vandalism, and worse crimes. This will lower ridership.

c. They can be **hazardous** for the disabled and elderly. Many years ago I witnessed an elderly friend's leg get caught in the subway door as she exited. She could not extricate it. Fortunately, the employee in the cab whose job it was to make sure everything was clear saw her predicament and quickly opened the door, allowing her to pull out her leg. Had he not done so, she would have been dragged along the platform floor as the train left the station.

d. They invite the **homeless.** They would be a dry, comfortable place to sit/lie down at night and cool and airconditioned during hot days for the homeless. If homeless people begin spending much time in the stations and on trains, urine odors could become a problem, particularly if there are no restrooms in the stations. This will discourage Choice Riders who will drive, adding to congestion.

QUESTIONS/SUGGESTIONS

I found some sections of the DEIS puzzling and would appreciate an explanation or rationale for that

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particular statement, table, or figure. I am not an engineer, architect, or transit technician. I am simply a citizen who rides public transit as well as drives a car. I have some experience with public transit as a user, having been a commuter on the New York subway and Yokohama transit systems. As a traveler, I 've used public transit more than the typical American tourist. I've found buses and subways are an interesting way to see the locals; they're reasonably priced and the light/heavy rail is usually fast and efficient. I have ridden on commuter and urban rail systems, light rail (usually trolleys), buses, and ferries.

1. In what situations does the Transportation Research Board define "late" as more than five minutes late for an express bus? If it does, I find it contrary to most people's thinking

2.a. Peak-Period Transit Work Trips (1.3.2). Why is Waipahu-Waikele lumped together with urban Honolulu for home-based origins of work trips? It should be separated to show the need for the train being built to serve their commute to urban Honolulu. (p.1-13)

2.b. Similarly, why are Waipahu-Waikele bus commuters lumped with others--all in urban Honolulu, where congestion is not a major problem--to account for 50% of islandwide am peak-period home-based work trips? Waipahu-Waikele needs to be separated to help support the need for the train.

3. The 60% of all am peak period bus trips destined for work in Downtown, Punchbowl, Sheridan-Date, and Waikiki do not show if the origins are primarily in urban Honolulu or Leeward or Central O'ahu. They shoul be broken down by Origin areas so that the percent of trips originating in Waipahu, Waikele, Kapolei AND ending in Downtown, UHM/Makiki, Ala Moana, Waikiki, and other parts of urban Honolulu can be clearly seen. Similarly, the raw numbers and percent of trips originating from the Waianae Coast in the am peak period should be connected to their destinations in urban Honolulu and shown in a table. (p.1-13)

4. Figure 2-38 Kapolei Bus Service. Bus route numbers and routes should be more clearly delineated In my travels I've used bus maps that do this.

5. Figure 2-39 Central Oahu Bus Service. The map should have bus route numbers and routes clearly delineated. What are the Bus route numbers? (p2-35)

6 Bus System (p. 2-36). What are these "special shuttles" and whom will they serve? (p2-38 col 2)

7. The Bus Level-of-Service should be displayed like the green boxes on p.3-3.

8.a. Fig. 1-11. Why were Routes 52 (Wahiawa-Circle Island) and 55 (Kane'ohe-Circle Island) selected? They're both going against traffic, one to the North Shore, the other to the Windward side They're also primarily sightseeing buses aimed at tourists going to Turtle Bay Hotel and to the Windward coast.

8. b. According to Figure 1-11, Bus 52 took about 130 minutes in 2007 to go from some place to someplace else. The 12/7 /08 timetable says it's 93 minutes from Ala Moana Center to Haleiwa Beach Park in the morning rush hour. What are the starting and ending points for the 130 minutes? How was this time obtained?

8.c. Moreover, Figure 1-11 also shows Route 40 (Honolulu-Makaha) takes about 170 minutes in 2008, about 150 minutes from 2004-2007. But the 12/7/08 Route 40 timetable shows the 6:11 am originating from Makaha Towers arrives at Ala Moana Center at 8:37 am, 146 minutes later. The 6:41 am from Makaha Beach arrives at Ala Moana Center at 9:01 am, 140 minutes later. How do you account for this discrepancy?

8. d. Of course, all of these times are unacceptable. TheBus should look immediately into providing a

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Super Express from the Wai'anae Coast that skips all stops from Kapolei until Middle Street to reduce the time any rider from that area has to spend on the bus. TheBus should also immediately begin exploring more comfortable coach-type buses for those who must spend over one hour on the bus Other express buses originating from Kapolei should be provided.

9. Pedestrian and Bicycle Systems (1.4.4). "...there are 98 miles of existing bicycle facilities on O'ahu."

What is included in "facilities"?

10. TRAIN SPEED. I do not understand why a speed of 55 mph is necessary when stations are going to be a mile apart Isn't it more horsepower (?) than necessary for an urban train stopping so often? The NYC subway averaged about 30 mph yet was faster, cheaper, and more convenient than driving. Many upper middle income people commuted on the subway because parking was so costly if even available, and driving was slow and nerve wracking Only the express trains were able to go much above 30 mph on a limited stretch, and express lines require a third track, which has never been proposed for O'ahu. The Yokohama subway averaged about that or less but was the most convenient and cost-effective way for most middle-income commuters to get to work or school because of high parking costs.

Isn't requiring a train capable of 55 mph akin to having a car capable of 100 mph when the highest legal speed on a freeway is 60 mph?

11. AIRPORT AREA EMPLOYMENT STATISTICS. What are the employment statistics for the Airport area, including and excluding airport employees, most of whom do not need to travel during peak hours? (Fig. 1-6 lumps Airport with Pearl Harbor for an impressive 38.5k. But at a public meeting a City employee/consultant said there were about 900 airport employees.)

12. FARE INSPECTORS ON TRAINS. Are turnstiles not being included in every station? Usually there are turnstiles where one inserts a card or token, obviating the need for an inspector to randomly check for payment They could be useful at night to discourage freeloaders who sneak in, but wouldn't it be more cost effective to have them in the stations to catch people sneaking in without paying? Also if there are turnstiles,would the freeloaders caught or deterred offset the cost of having an employee to catch them?

What is the rationale, where has this been tried successfully, and for how long has it been done?

I recall it being done on lightrail/trolleys in Germany, but these were **surface trolleys** where passengers could board from center or rear doors directly from the sidewalk trolley stop like one boards a bus. It was also done on long distance trains where stops were perhaps five miles apart, giving the conductor time to check an entire car between stops.

In my travels I cannot recall fare inspectors on city subway/trains randomly checking for valid tickets, passes, or tranfers in New York City, Washington DC, Boston, Philadelphia, Portland, Los Angeles, San Diego, Vancouver, or Toronto in North America; nor in England, Paris, Italy, Austria, Hungary, Czech Republic, Poland, Denmark, or Sweden in Europe; nor in Japan.

13. Table 7-9. Comparison of Transit Travel Times (Minutes) among Alternatives.

Are the times Door to Door?

14. The 12/2005-1/2006 Bus Survey was a good idea. A survey done of households from Leeward and perhaps Central O'ahu could have yielded valuable data for planning transit. It certainly wouldn't be inexpensive; I can imagine it costing $40-80,000, but that's a small investment compared to the $10

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million spent on consultants early on.

15. Additional bus service with school buses or private vehicles was rejected [Table 2.2]. Why was this not explored? Possible contracts with tourist buses for peak period express use would be much cheaper than rail. It might also help them survive during poor economic periods. It would have allowed testing the different kinds of coaches without purchasing them by the City. Purchase of other more luxurious coaches to attract motorists from their cars thereby reducing congestion during rush hours seems to have not been explored.

16. BUS ADVISORY COMMITTEE. Is there a Bus Advisory Committee comprised of regular bus riders from all over the island to advise TheBus on problems and make suggestions on improvements? Ideas and comments from the public could be presented at its monthly or bimonthly public meetings announced and held at a time convenient for commuters and in a location convenient to bus riders. If there is one, I would like information on where and when it meets. If there isn't one, I recommend it be established soon.

I appreciate your consideration of my comments.

Aloha,
Amy Y. Kimura

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DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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DEPUTY DIRECTOR

June 11, 2010 RT2/09-298759R

Ms. Amy Y. Kimura
1310 Heulu Street
Apartment 1002
Honolulu, Hawaii 96822

Dear Ms. Kimura:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

Your comments will be addressed in the same manner as submitted.

CHAPTER 1 Purpose and need for rail project

A. Enhanced bus service

Enhanced bus service was examined during the Alternative Analysis phase. As stated in Section 2.2.2 of the Final EIS, the enhanced bus service would have improved transit times somewhat, but roadway congestion would not have been alleviated. As stated in Chapter 3, with the Project, bus service will be enhanced and modified to coordinate with the fixed guideway system. Some existing bus routes will be altered or eliminated to reduce duplication of services provided by the fixed guideway system. Buses removed from service in the study corridor will

be shifted to service in other parts of the island. Certain local routes will be rerouted to provide frequent and reliable connections to the nearest fixed guideway station.

B. Direct future growth

Although the Project does not include any commercial or residential development, it supports the City's goal of directing future development to Kapolei by providing high quality, frequent, and reliable transit service to this area. The City's Department of Planning and Permitting (DPP) has adopted a transit-oriented development ordinance (Ordinance 09-4) that creates a comprehensive planning process for each station area. DTS is working with other City agencies and the Hawaii Department of Transportation to ensure good access to the rail transit stations for pedestrians, bicyclists, and bus riders. Many stations are near existing or future bicycle paths and routes. All stations will be designed to accommodate pedestrians, bicyclists, feeder bus riders, and TheHandi-Van users.

C. Purpose and Need

1. Table 3-14 of the Final EIS shows that in comparison to the No Build Alternative, in 2030 the Project will reduce congestion by 18 percent, as measured by daily vehicle hours of delay. Of all the alternatives evaluated during the Alternatives Analysis phase, only the Fixed Guideway Alternative provided a substantial improvement in transit travel time and had a greatly lower cost per hour of user benefit than the Managed Lane Alternatives evaluated.

2. The Honolulu City Council sets transit fares by enacting ordinances. Chapter 6 of the Final EIS shows that rail service will cost about $77 million a year (in 2009 dollars) or about 40 percent of the present cost of TheBus (in 2009 dollars). By 2030, the cost of rail will be about 25 percent of the total transit system cost. For operating and maintenance costs, City Council policy requires that between 27 and 33 percent of the costs be recovered from fares. As system-wide transit costs rise, necessitating an increase in fares, the rail element generally will be responsible for a smaller portion of those costs than the TheBus and other elements of the system.

3a. Increasing parking fees would not have any effect on improving corridor mobility. It might slightly reduce demand in the corridor, but only if done in combination with providing a reliable alternative transportation means, such as the Project.

3b. As indicated in Section 1.8.1 of the Final EIS, average weekday travel speeds on the H-1 Freeway are currently less than 20 miles per hour in many places and will degrade even further by 2030. As delays increase, traffic demand will shift from peak to non-peak periods, thereby affecting midday and evening conditions. While most delay occurs during the weekday peak periods, mid-day weekday and all-day weekend traffic conditions are frequently congested. Even a 10-minute increase in travel times, when applied to a large number of travelers, results in a substantial loss of time to congestion.

4. As discussed in response to Comment A, enhanced bus service was studied during the Alternatives Analysis phase. A bus operating in a shared right-of-way, or even

one with lights and cross-traffic, can never provide as reliable service as a system in exclusive right-of-way.

5. High parking rates are a hindrance for low-income populations wishing to drive to their destination Downtown. Parking rates are unaffordable for some low-income populations, thus causing these individuals to find another means of reaching their destination.

D. Alternatives explored

As described in Chapter 2 of the Final EIS, the Alternatives Analysis process evaluated a broad range of alternatives and eliminated those that would have performed poorly, which included the Transportation System Management (TSM) Alternative and the Managed Lane Alternative. Section 2.2 of the Final EIS states that no alternatives have been identified that would satisfy the Purpose and Need at less cost, with greater effectiveness, or less environmental or community impact.

E. Groups served by transit

1. The future transit system will have the same fare structure for all modes. As noted in Chapter 2 of the Final EIS, bus service will be enhanced and the bus network will be modified to coordinate with the fixed guideway system. Section 2.3.9 of the Transportation Technical Report (RTD 2008a) details the guiding principles that were used when restructuring the bus network. These principles include the following:

- *Local routes will be either discontinued or reclassified as a feeder service if the bus route serves the same general alignment as the fixed guideway. The exceptions are those bus routes deemed essential to provide local bus stop service along the fixed guideway alignment. Selected local routes will operate their full alignment in the late evenings when the fixed guideway is not operating. These routes will provide 24-hour service.*

- *Peak-period, peak-direction express bus routes that serve the same alignment as the fixed guideway system will be discontinued only if the estimated passenger travel time is effected by no more than 15 additional minutes.*

The intent of following the guidelines was to make sure the bus and rail technologies work together to provide the best system possible for transit riders. Existing and future bus routes, including frequencies, are presented in Appendix D of the Final EIS.

2. As indicated in Section 4.7.3 of the Final EIS, the rail system will result in increased transit options and improved mobility. The rail system will not eliminate the need for TheBus or TheHandi-Van and transit users can use the best option or combination of options for their lifestyle and specific individual needs. The transit system will be Americans with Disabilities Act (ADA) accessible. Elevators and escalators will be provided at all stations. In addition, platforms will be level with trains for boardings;

therefore, stairs or lifts, as used on buses, will not be required. The system operation plan considers all ADA requirements. Regarding security, all stations, park-and-ride facilities, and vehicles will include security cameras that are monitored at all times of operation, will have audible and visual messaging systems, and an intercom link to the system' operations center. Security personnel will also patrol the system.

3. Connection to UH Manoa will be served by buses integrated with the system. The Draft and Final EISs reflects this operation. Table 3-14 of the Final EIS shows that, when compared to the No Build Alternative, the Project will reduce islandwide congestion by 18 percent in 2030, as measured by daily vehicle hours of delay.

4. Chapter 3 of the Final EIS discusses construction effects on traffic and the steps that will be taken to minimize inconveniences during construction. As discussed in Chapter 3 of the Final EIS, a Maintenance of Traffic (MOT) Plan will identify measures to mitigate temporary construction-related effects on transportation. Construction contractors will develop the MOT Plan, which must be approved by the City and/or the Hawaii Department of Transportation. As stated in Section 3.5.7 of the Final EIS, an extensive public information program will be implemented to provide motorists with a thorough understanding of the location and duration of construction activities, as well as anticipated traffic conditions.

Beyond collection of property taxes that fund City operations, for which the City develops rates on an annual basis and part of which will fund transit services, there is no anticipated impact to property taxes. Operating and maintenance costs will be paid for from the same sources currently used for TheBus, which includes Federal funding, fare revenues, and subsidies from the City's General and Highway Funds. Fixed guideway operating costs will represent between 2 and 3 percent of the City's annual operating budget. The General Excise and Use Tax (GET) surcharge that funds the capital costs of the Project is a dedicated revenue source that the City Council adopted to pay for a priority concern of the community.

5. Tourists will continue to enjoy the beauty of Oahu and, once they are here, they will have more transportation options to travel to their destinations. The fact that this will be the only island with high-capacity transit, with an efficient airport connector, may attract more tourists who value the convenience, potential cost savings, and decreased travel time between various tourist destination spots along the Project's alignment. There is no evidence to suggest that other places have lost tourism as a result of an elevated guideway.

The Project's potential visual effects are discussed in Section 4.8, of the Final EIS. Many new viewsheds were studied for the Final EIS and, in some instances, significant visual effects were found. Overall measures will be taken to address visual impacts of the Project when possible. Please see the mitigation discussion in this section.

6. Figures 3-9 and 3-10 in the Final EIS show that there will be high fixed guideway ridership levels between stations in the Leeward area of the corridor. There

will be over 8,800 riders on the Koko Head-bound train after the Waipahu Transit Center Station during the a.m. peak period. The number of riders increases even more after the Pearl Highlands Station (over 13,000 riders during the a.m. peak period in the Koko Head direction). Ridership levels near Ala Moana Center will also be high, with over 7,000 passengers getting off the fixed guideway at the Ala Moana Center Station.

As a result of transit ridership, traffic volumes will decrease throughout the entire corridor. As shown in Tables 3-9 and 3-10 in the Final EIS, there will be an 11 percent decrease in traffic volumes traveling Koko Head-bound at the Kalauao screenline during the a.m. peak hour and a 10 percent decrease in congestion during the p.m. peak hour at this screenline traveling Ewa bound.

Chapter 2 Alternatives considered

A. No Build (bus system), Transportation Systems Management (TSM)

1. The No Build Alternative shows a 46 percent increase in system-wide congestion as measured by vehicle hours of delay (Table 3-14 in the Final EIS) compared to existing conditions. Therefore, buses would be operating in the same congestion as cars. As seen in Table 2-2 in the Final EIS, vehicle hours of delay are greater with the TSM Alternative than with the Fixed Guideway Alternative. The analysis conducted during the Alternatives Analysis phase showed that the Purpose and Need for the Project could not be met through a lower-cost, bus-based alternative alone.

2. The Draft and Final EISs compares Honolulu's bus service on-time performance with other transit systems. This information is from the Transit Cooperative Research Program (TCRP) Synthesis of Transit Practice 10. The synthesis reviewed more than 80 agencies' on-time performance standards, as they existed in 1994. Of the 80 U.S. transit agencies surveyed, 58 percent defined on time as being five minutes late or less. On-time performance measurements are particularly applicable to services operating with headways (time between buses) longer than 10 minutes, such as express buses. Canadian transit operator on-time performance standards are less lenient than those of their U.S. counterparts. Of the 17 agencies surveyed by the Canadian Urban Transit Association that define an on-time performance, 11 define "on-time" as being no more than three or four minutes late. The other six agencies define "on time" as being up to five minutes late. (Source: The Transit Capacity and Quality of Service Manual 2nd Edition, TCRP Report 100, Transportation Research Board. Research sponsored by the Federal Transit Administration).

3. The statement on Page 2-9 of the Draft EIS: "However, due to increasing traffic congestion and slower travel times, transit service levels and passenger capacity would remain about the same as they are today" refers to the bus system in the No Build Alternative which does not include a rail component. The statement on page 2-24: "Some existing bus routes, including peak-period express buses, would be altered or eliminated to reduce duplication of services provided by the fixed guideway system" refers to the bus system with the Project.

4. According to Chapter 3 of the Final EIS, traffic signal priority will occur at only a few fixed guideway stations (East Kapolei, Pearl Highlands, and Ala Moana Center) as part of the Project. Implementing traffic signal priority now would require modification of signal timings and intersections to provide bus-only lanes. Currently, there is no separate funding source that can be applied to traffic signal priority.

5. As stated in Section 3.4.2 of the Final EIS, "Because of the high frequency of the fixed guideway service (three-minute headways between trains during peak periods), riders transferring from buses to the fixed guideway will experience minimal wait times. Riders transferring from the guideway service to buses will benefit from improved frequencies on existing bus routes serving stations. In addition, several new routes with high frequencies will be provided as feeders to the guideway system. Since these routes will primarily operate in residential areas, they will provide greater reliability versus routes operating along congested arterials. Riders transferring from rail to bus will also benefit from coordinated transfers between trains and buses, thereby minimizing wait times."

6. Under current conditions, travel times via bus can vary considerably due to traffic congestion and unpredictability. Longer-distance buses (such as Route C), express routes, and other local routes traveling to and from Downtown are predicted to take longer in the future due to worsening traffic conditions. Future travel times with rail will be highly reliable. The rail system will operate in its own right-of-way every three minutes during peak periods and every six minutes during mid-day.

7. There is no evidence that the elderly or disabled will not use the fixed guideway system. As discussed previously in response to Comment E2, Section 4.7.3 of the Final EIS indicates that the rail system will result in increased transit options and improved mobility. The rail system will not eliminate the need for TheBus or TheHandi-Van, and transit users can use the best option or combination of options for their lifestyle and specific individual needs.

8. With the Project, visitors and residents will benefit by having more transportation options. Table 3-13 in the Final EIS shows daily person transit trips by purpose, broken down for residents and visitors. As seen in this table, transit trips for both groups increase with the addition of the Project compared to the No Build Alternative. Daily resident person trips by transit increase 24 percent with the Project compared to without, while daily visitor person trips by transit increase 19 percent with the Project compared to without the Project in 2030.

9. Technology related to transportation continues to evolve. Improvements to all modes, including transit and single-occupant vehicles, will make those modes safer and more efficient. The changes speculated on by the commenter may make the internal combustion engine used in automobiles today obsolete; however, they would enhance the attractiveness of an electrically powered rail system, which already consumes less energy per passenger-mile carried than automobiles, as is illustrated by the reduced energy demand shown in Section 4.11 of the Final EIS.

B. Bicycles as alternative supplemental transportation

1.-5. The scope of the Project focuses on development of a fixed guideway transit system and not on programs involving the bicycle system. However, the Project will encourage use of bicycles as a way to access stations. As noted in Chapter 2 of the Final EIS, facilities in the form of bike racks and/or lockers will be provided at each guideway station. It is also envisioned that bicycles will be allowed on trains, as regulated by a bicycle policy.

Many bicycle lanes planned by the City or State could connect to fixed guideway stations. The Oahu Bike Plan *is currently being updated by DTS and is scheduled to be adopted in 2010. The Draft Master Plan includes a prioritized list of bicycle projects developed using criteria that include access to transit. Several projects that would connect existing or future bicycle facilities to rail transit stations are included in the Draft Master Plan. Additional information on the Oahu Bike Plan is available at http://www.oahubikeplan.org.*

RAIL

A. Rail funding

The comment is not related to the project alternatives or effects. Regarding revenue from the GET surcharge, the financial plan is updated periodically in recognition of changing conditions. Revenues and costs are expected to rise and fall during the time the surcharge is in effect. Section 6.6 of the Final EIS includes a discussion of risks and uncertainties associated with the funding assumptions.

B. Rail route

1. The fixed guideway system extends from East Kapolei to Ala Moana Center and points in-between. The Project has logical termini and independent utility from any extensions that may be constructed in the future. The future extensions to East Kapolei, Salt Lake Boulevard, Waikiki, and UH Manoa are discussed in the cumulative impacts sections of Chapters 3 and 4 of the Final EIS. The future extensions are not part of the Project; thus, they are not required to be evaluated under Chapter 343 of the Hawaii Revised Statutes and NEPA. Under NEPA, environmental analysis is only required when there is a proposed action by a Federal agency. Here, because the future extensions are not proposed for implementation at this time, they are not part of the Project studied in the Final EIS. It would be premature to undertake an environmental analysis of the extensions (beyond the cumulative impacts analysis) because they are not part of the proposed action to be taken by the City and FTA. If the future extensions are proposed for implementation at some time in the future, environmental analysis of the extensions and appropriate alternatives will be undertaken at that time. Connection to UH Manoa and Waikiki will be served by buses integrated with the system. The Draft and Final EISs reflect this operation. According to Table 3-18 in the Final EIS, 282,500 trips will be made on transit (bus and rail) daily in 2030. Table 3-14 in the Final EIS provides the information that in comparison to the No Build Alternative, in 2030 the

Project would result in an 18 percent reduction in congestion, as measured by daily vehicle hours of delay.

Regarding population, the corridor from Kapolei to UH Manoa (i.e., the study corridor) is well suited for the fixed guideway project. In 2000, 63 percent of Oahu's population of 876,200 and 80 percent of its 501,100 jobs were located within the study corridor. By 2030, these distributions will increase to 69 percent of the population and 83 percent of the employment as development continues to be concentrated into the Primary Urban Corridor and Ewa Development Plan areas. As stated in Section 1.3.1 of the Final EIS, 2,036,000, or 73 percent, of the approximately 2,790,000 islandwide daily trips, and 350,000, or 64 percent, of the 544,000 a.m. peak-period work-related trips are currently generated within the study corridor. The study corridor attracts an even higher percentage of islandwide work-related trips with 446,000, or 82 percent, of a.m. peak-period work-related trips having destinations within the study corridor.

Regarding farebox revenue, the amount of service provided will be scaled to generally match the demand. If the service attracts fewer riders than expected, then less service may be provided by adjusting headways or train length, thereby resulting in lower than expected operating and maintenance costs.

2. As shown throughout the Draft and Final EISs, and detailed in Figure 2-22 of the Final EIS, there is a fixed guideway station at Leeward Community College.

C. Restrooms at stations

Each station will have a secured public restroom. Because of maintenance and security concerns, patrons will ask the station attendant for access to the restroom.

D. Rail revenue

1. The fare for the rail and TheBus will be the same; so if the system were operating today, a trip would cost $2.25. Fares are anticipated to increase with inflation and the cost of automobile ownership; use also is anticipated to increase at or above the rate of general inflation. Capital costs of the Project, including finance charges, are expected to be fully paid for by a combination of FTA Section 5309 New Starts Funds from the Federal government and the GET surcharge revenues collected from 2007 through 2022 on Oahu. Farebox revenue will be used to cover between 27 and 33 percent of annual operating and maintenance costs. The fixed guideway will represent about 25 percent of the total operating and maintenance costs of the overall public transportation system. This information is detailed in Section 6.4 of the Final EIS. The EIS assumes that fares for all transit modes, including the fixed guideway line and TheBus, will be the same with a fare structure similar to today. Zone fares or distance-based fares are not assumed. Fares charged in Vancouver are unrelated to the Honolulu system.

2. Current users of the TheBus with its fare structure for seniors and those with limited income populations will be able to transfer onto or directly access the fixed

guideway system with their current TheBus passes or one-way fare. Since the fare structure is assumed to be the same and that transit-dependent households will experience a substantial time benefit (as shown in Figure 3-7 of the Final EIS), the combination of a consistent fare structure across modes coupled with a decrease in travel time is anticipated to attract motorists out of their cars. Fares are anticipated to increase with inflation and the cost of automobile ownership; use also is anticipated to increase at or above the rate of general inflation. Fixed guideway operating costs will represent between 2 and 3 percent of the City's annual operating budget.

3. As stated in response to Comment D2, the unified fare system coupled with decreased travel times with rail (as shown in Figure 3-7 of the Final EIS) is anticipated to attract motorists out of their cars. There will also be coordinated transfers between the fixed guideway system and the bus, which will minimize wait times. Forecasts indicate that riders who are predicted to use the train are those who will find it is more beneficial than another transportation alternative. Some fixed guideway riders are those who currently use TheBus, but many will be from other modes. Forecasts indicate that approximately 40,000 vehicles will be removed from roadways as a result of the Project. Most guideway systems are attractive to automobile users because of the time benefit and the lower stress levels during the ride.

4. As shown in Table 3-22 of the Final EIS, according to the travel demand forecasting model, the estimated demand for parking in 2030 totals about 1,800 cars at the East Kapolei and UH West Oahu Stations. The total capacity will be 1,900, which should satisfy the demand in this area. The overall system-wide demand for parking in 2030, as estimated by the model, is about 5,900 parking spaces, exceeding the 4,100 currently planned. However, experience with park-and-ride facilities in Honolulu to date is limited. Existing park-and-ride facilities (offering express bus service) have been generally underused. The projected mode of access shares were compared to observed data from several Mainland areas, notably San Diego. Given the history of park-and-ride use on the island, it seems prudent to evaluate any need for additional or larger facilities on the basis of empirical experience rather than commit substantial additional funding now. Any need for additional parking at the four stations with park-and-ride facilities would best be determined once experience is gained about their use. Other station access, such as feeder bus and passenger drop-off, can also be expanded offering another option to passengers. In addition, as shown in Table 3-20 in the Final EIS, 90 percent of fixed guideway riders will access the system via walking, biking, or bus. Roadway congestion will decrease by 18 percent with the Project compared to the No Build Alternative.

5. The following systems operate with 3 minute or less headways during peak periods: WMATA Red and Orange lines (3 minutes), Toronto Bloor-Danforth and Yonge-University-Spadina lines (2.4 minutes), BART through Transbay Tube and San Francisco (2.6 minutes), Vancouver SkyTrain Expo Line (2 minutes), Copenhagen Metro (2 minutes), Lille Line 1 and 2 (1.5 minutes), and Toulouse Line (1.3 minutes). Many systems that operate trains with less frequent headways use longer trains. The Honolulu system relies on frequency rather than train length. The use of 3-minute headways obviates the need to offer longer trains. This also allows for the construction of smaller

stations and reduced waiting time. However, the amount of service provided will be scaled to generally match the demand. If the service attracts fewer riders than expected, then less service may be provided by adjusting headways or train length, thereby resulting in lower than expected operating and maintenance costs.

E. Rail operation: Safety, security

1. DTS, with assistance from the Honolulu Police Department, is developing a security plan for transit facilities, including park-and-ride lots. Security, including cameras, will be provided at all stations and park-and-ride facilities.

2. None of these items are associated with automatic train operations. Fully automated vehicles are used in Vancouver, London Docklands, Copenhagen, and other systems. Staff on the train, which as described in Chapter 2 of the Final EIS will be included in the system, are able to react to incidents on the train much more quickly than a driver who must remain in the driving cab. Vehicle door-closing systems are being designed with safety systems to prevent entrapment in the doors.

QUESTIONS/SUGGESTIONS

1. The Transit Cooperative Research Program (TCRP) Synthesis of Transit Practice 10 reviewed more than 80 agencies' on-time performance standards as they existed in 1994. Of the surveyed agencies, 58 percent of the 80 U.S. transit agencies defined on time as being 5 minutes late or less. On-time performance measurements are particularly applicable to services operating with headways longer than 10 minutes (Source: The Transit Capacity and Quality of Service Manual 2nd Edition, TCRP Report 100, Transportation Research Board. Research sponsored by the FTA).

2a. This section lists high origin areas for peak-period work trips. Waipahu-Waikele and urban Honolulu both fall in this category.

2b. Waipahu-Waikele represents a significant origin for transit trips.

3. Complete production-attraction matrices are available in Addendum 01 to the Travel Demand Forecasting Results Report.

4. and 5. Information about existing and future bus routes, including route numbers and frequency, is provided in Appendix D of the Final EIS. This appendix includes a series of maps showing bus route service near each fixed guideway station.

6. Special shuttles are those operated by private companies, such as the shuttle for Hilo Hatties or the Waikiki Trolley. These shuttles can serve the general population (as in the case of the Waikiki Trolley) or individuals traveling to or from a specific destination, such as a shopping center.

7. Transit level of service information involves a variety of factors and is not calculated in the same manner as for roads. Chapter 3 of the Final EIS includes information on level-of-service involving transit reliability.

8a. TheBus operates 100 bus routes. Of those routes, only 13 operate completely outside the study corridor, which accounts for less than 4 percent of the total weekday bus service in terms of revenue hours of service. The balance of service outside the study area is provided by 35 routes that have a substantial portion of their operation within the study corridor. Consequently, the reliability of service outside the study corridor is directly related to the impacts of traffic congestion and other factors occurring inside the project area. For example, Routes 52 and 55 (Circle Island) take over four hours to complete a bus trip. About one-third of the Circle Island trip is spent within the project area. Any delay occurring in the project corridor effects people waiting for that bus to arrive in Kaneohe, Haleiwa, Wahiawa, Mililani, or neighborhoods in between. In the a.m. peak period, these two routes provide essential inbound (town-bound) service for workers, students, and other trip purposes from the North Shore, Central Oahu, and Windward communities. In the p.m. peak period, they provide outbound (to Central Oahu, North Shore, and Windward) service from Downtown and Ala Moana Center. Both routes are a major connection for residents in the communities they serve.

8b. Bus 52 originated from Ala Moana Center and traveled to Turtle Bay Resort. This time was obtained from the March 2, 2008 public timetables and represents travel time during the p.m. peak period in the peak direction.

8c. Figure 1-11 in the Final EIS shows selected PM trips in the peak direction (Ala Moana Center and Downtown to outlying areas Makaha, Ewa Beach, Central, North Shore, and Windward communities). The March 2, 2008 public timetables show that Route 40 leaving from Ala Moana Center at 3:03 p.m. to Makaha takes 169 minutes. The 2:37 p.m. departure takes 167 minutes.

8d. Enhancements and modifications to the bus system will occur to coordinate service with the fixed guideway system. Other modifications to the existing bus service are outside the scope of this Project; however, this Project does not preclude such modifications from occurring.

9. As shown in Section 3.3.5 of the Final EIS, bicycle facilities on Oahu include Shared Roadways (30.1 miles), Bike Lanes (33.6 miles), and Shared-use Paths (34.3 miles). Further descriptions of these facilities are provided in Section 3.3.5 of the Final EIS.

10. The system will average approximately 30 miles per hour, including stops at stations. A 55 mile per hour maximum speed between stations is typical of modern steel-wheel systems. The train will reach 50 miles per hour at several locations in the system.

11. Approximately 9,000 people are employed at the airport and supporting facilities, as compared to approximately 17,000 at the combined Pearl Harbor and

Hickam. Including other employment in the airport and Pearl Harbor area, total employment is approximately 38,500 jobs, as shown in Figure 1-6 of the Final EIS.

12. As described in Chapter 2, the system will be run as a proof of payment system without fare gates. The use of fare gates would require additional staff at stations. Inspectors will cite and fine passengers without tickets. This system is widely used, including for example Vancouver, B.C., and Los Angeles.

13. Yes, transit travel times in Table 7-2 in the Final EIS are door to door. They represent the length of time it will take an individual to walk from their origin to a transit station, wait for a transit vehicle, travel by transit, and walk to the final destination.

14. The information from the on-board rider survey provided important information on existing ridership characteristics. This information was used in travel forecasting efforts carried out for the EIS.

15. The concept of providing additional bus service with school buses or private vehicles was rejected only because it was not substantially different from the TSM Alternative that was separately evaluated in detail and rejected. Both alternatives were essentially the same service, but being provided either by a different party or with a different type of bus.

16. There is currently a Bus Advisory Committee that deals with issues regarding TheBus only. Information on this committee and how to join should be obtained through TheBus. The City is considering the possibility of some form of citizen rail advisory group, but no determination on the mechanics of establishing or organizing such a committee has been made at this time.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

RT12/08-291321

Dept of Transportation Svcs
650 South St 2nd Floor
Hon. HI 96813

12/11/08

re: Rail

1. I am against the rail - Too Expensive!
2. If it is done, it makes more sense to do the Pearl City - Downtown route b/c It is the major traffic corridor with probably the largest ridership.

I also makes the land more easily acquireable and least subject to speculation before acquisition.

Very Truly
Phillip Tkishimori

CTS RAPID TRANSIT
DEC 12 P3:29
'08

Phillip T. Kishimori
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AR00002303

DEPARTMENT OF TRANSPORTATION SERVICES

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT10/09-336243

Mr. Phillip T. Kishimori
4389 Malia Street
Hiolani AL #691
Honolulu, Hawaii 96821

Dear Mr. Kishimori:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

Your objection to the Project has been noted. Section 6.3 of the Final EIS describes the funding sources anticipated to be used to pay for the capital costs of the Project and the City's overall public transportation system. Capital costs of the Project, including finance charges, are expected to be fully paid for by a combination of FTA Section 5309 New Starts Funds and FTA Section 5307 Funds from the Federal government and revenues from the County General Excise and Use Tax (GET) surcharge levied from 2007 through 2022. Section 6.4 of the Final EIS describes the funding sources to pay for ongoing operating and maintenance costs associated with maintaining the resulting transit system in a state of good repair. Operating and maintenance costs will be paid for from the same sources currently used for TheBus: Federal funding, fare revenues, and subsidies from the City's General and Highway Funds. Fixed guideway operation costs will represent between 2 and 3 percent of the City's annual operating budget.

As described in Section 2.5.10, Project Phasing, and further in Section 8.6.9, Construction Phasing, in the Final EIS, to support phased opening, the first construction phase must be connected to a maintenance and storage facility, which requires considerable space. No location has been identified closer to Downtown with sufficient available space to construct a maintenance and storage facility.

Therefore, construction will begin between East Kapolei and Leeward Community College. The Project will be constructed in phases to accomplish the following:

- *Match the anticipated schedule for right-of-way acquisition and utility relocations.*
- *Reduce the time that each area will experience traffic and community disturbances.*
- *Allow for multiple construction contracts with smaller contract size to promote more competitive bidding.*
- *Match the rate of construction to what can be maintained with local workforce and available financial resources.*
- *Balance expenditure of funds to minimize borrowing.*

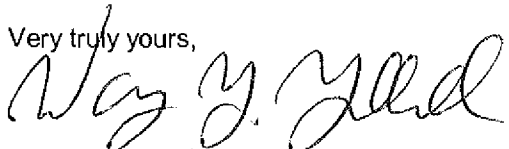
The portion of the corridor in the Ewa direction of Pearl Highlands is less developed than the areas in the Koko Head direction. Right-of-way can be obtained more quickly at the west end of the Project; therefore, overall project construction can begin earlier, resulting in lower total construction costs. Construction is planned to continue uninterrupted in the Koko Head direction from Pearl Highlands to Aloha Stadium, Kalihi, and finally to Ala Moana Center.

As portions of the Project are completed, each will be opened incrementally so that system benefits, even if limited during the initial phases, will be realized prior to completion of construction of the entire Project.

The Project is focused exclusively on the construction and implementation of rail transit service, and that is covered in the Draft and Final EISs. However, as discussed in Section 4.19.2 of the Final EIS, transit-oriented development (TOD) is expected to occur in project station areas as an indirect effect of the Project. The increased mobility and accessibility from the Project could increase the desirability and value of land near stations, thereby attracting new real estate investment nearby (in the form of TOD). Planning and zoning around station areas will be conducted by the City's Department of Planning and Permitting under a process covered by the City's new TOD ordinance.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,



WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
Creation Date :	2/4/2009
Creator Affiliation :	
First Name :	Dragan
Last Name :	Kljajic
Business/Organization :	
Address :	656 Pearson St. Apt. 604
Alternative Preference :	
Apt./Suite No. :	
City :	Des Plaines
State :	IL
Zip Code :	60016
Email :	kljaja@email.com
Telephone :	
Telephone Extension :	
Add to Mailing List :	Email
Submission Method :	Website
Other Submission Method :	
Submission Date :	02/04/2009
Submission Content/Notes :	Aloha kokua, Please, reconsider implementing MAGLEV train and consult with Japanese and German urban transit systems experts, if not too late! Hawaii deserves the best, I'll be moving back within months. Mahalo

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, 3RD FLOOR
HONOLULU, HAWAII 96813
Phone: (808) 768-8305 • Fax: (808) 768-4730 • Internet: www.honolulu.gov

MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-334453

Mr. Dragan Kljajic
656 Pearson Street
Apartment 604
Des Plaines, Illinois 60016

Dear Mr. Kljajic:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

As stated in Section 2.2.3 of this Final EIS, the NEPA Notice of Intent requested input on five transit technologies. A technical review process included the opportunity for public comment and was used in parallel with the alternatives analysis to select a transit technology. The process included a broad request for information that was publicized to the transit industry. Transit vehicle manufacturers submitted 12 responses covering all of the technologies listed in the Notice of Intent. An independent five-member technology panel composed of four transit experts and a transportation academic appointed by the City Council evaluated guided rubber-tire-on-concrete systems (e.g., Phileas bus system and VAL-type systems), monorail (which is a variation on rubber-tyred technology), steel-wheel-on-steel-rail systems, (e.g., light rail and rapid rail), and magnetic levitation (MAGLEV) . The panel considered the performance, cost, and reliability of the proposed technologies.

Proprietary technologies, meaning those technologies that would have required all future purchases of vehicles or equipment to be from a single manufacturer, were eliminated because none of the proprietary technologies offered substantial proven performance, cost, and reliability benefits compared to steel wheel operating on steel rail. The panel accepted public comment twice as part of its review. By a four-to-one vote, the panel chose a steel wheel vehicle operating on steel rail system because it was considered safe, reliable, economical, and non-proprietary. Those results are documented in the panel's report to the City Council dated February 22, 2008 entitled "Independent Technology Selection Panel Report".

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

-Where are the "five distinct transit technologies" under review in the 2008 DEIS?
The Federal Register/Vol. 72, No. 50 of March 15, 2007 shows a "Notice of Intent To Prepare the Draft EIS".
The Federal Register clearly states that: "Fixed Guideway Alternatives, which would include the construction and operation of a fixed guideway transit system in the corridor between Kapolei and UHManoa with a branch to Waikiki. The Draft EIS would consider five distinct transit technologies: Light rail, rapid rail transit, ribber-tire guided vehicles, a magnetic levitation system, and a monorail system."
-Will the Mayor and City Council of Honolulu open up the transit process to ALL technology manufacturing companies who submit thru the RFI/RFP process? As they say: "May the best man win".
-Where are the cost numbers in the 2008 DEIS for the "UHManoa with a branch to Waikiki" extensions?
-When will the current Design-Build Contract RFP-DTS-0900015 on the Department of Budget and Fiscal Services Division of Purchasing website document be available to be viewed by the general public on Oahu? -Will it be displayed on the transit site for public review the way the 2006 AA & 2008 DEIS documents are?
-What state procurement laws or codes are being violated if the original approved ordinance was authorizing the city council to review qualifications & system requirements for potential bidders prior to the administration seeking and soliciting the RFP?
"Building rail transit NOW is the most "cost-effective way" to avoid even more congestion".
-Who on earth thinks that spending $5.767 Billion to $7.173 Billion dollars for only a short 20 mile rail system is "the most affordable, cost-effective" solution for Oahu?
-Will this equal $288 million per rail mile, up to $358 million per rail mile for just the 20 mile section build?
-Where is the true per-capita spending breakdown in the DEIS for this multi-billion dollar transit project?
-Where is the Rail Transportation Spending per capita by state? -Where does Hawaii rank?
-On 2/2/09, Minnesota Congressman Jim Oberstar claimed that the CEI, or 'cost effectiveness index' federal requirement is widely viewed as a hindrance to transit projects and it will be modified, and not just to be amended, but eliminated. Is this true?
"As soon as there is a Federal Transit Administrator I will encourage that person to, by executive order, erase it from the books. And if they don't we'll do that in legislation." says Rep. Jim Oberstar.
Todays 2/6/09 Star-Bulletin staff story reports that the RFP for the first 6.5 mile transit segment will have transit stations built and constructed later in another contract.
-How can the Mayors aggressive first segment completion target date of 2012 be useful for local residents without the transit stations completed?
-Who will ride a system that is built in the empty fields of Kapolei with zero surrounding ridership?
-How will the current flawed transit route serve residents in high population areas that were skipped?
-Why was the first 20 mile route not placed in the high population areas of Ewa Beach/Ft Weaver rd., Salt Lake, & thru Waikiki up to UH Manoa?
"By year 2030, up to 90,000 riders per day are 'expected' to use rail".
-How can Oahu transit ridership at just 6% today islandwide, only go up 1% with the building of "rail transit", to a 7% ridership total in year 2030 as the DEIS states? (Table 3-13, page 3-23)
-Will transit ridership only increase 1% by year 2030 after spending multi-billions on "rail"?
-Now that America is going bankrupt and the economy is in the toilet, how can Oahu residents afford the added new tax burdens of building, maintaining & operating and subsidizing a massive multi-billion-dollar project that only a small minority percentage of current bus transit riders might use (6%-7% total on Oahu)?
Oahu has become over-populated because we refuse to stop the over-development of the West side of this island.
-Is there a way to convince over 140,000 local residents who were not in favor (49%) of "steel on steel

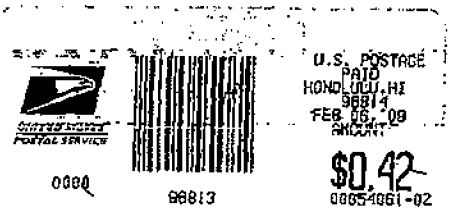
rail" and who voted against it at the Nov.'08 ballot vote, that it was needed or voted in without pro-rail propaganda and union funding force through support of a one-sided view to push and shove the passage of this flawed rail system onto the Oahu voters?
On 4/23/2007, on Page A1 of the Honolulu Advertiser: "Sewage mandate disputed; Inouye says EPA order to upgrade plants would "bankrupt" the city".
-Is Sen. Inouye correct to claim that when the Feds force the issue of upgrading the city waste water treatment system at a cost of over $1 billion, would that "bankrupt" Honolulu?
The 2006 transit cost was near $3.5 billion, now @ $6.4+ billion for the same 20 mile route.
- Why has the cost of "rail" transit gone up billions since the 2006 AA report?
The so-called 'required' 8 page Ad slick brochure, (Oahu taxpayer funded), claims that "One day, rail will extend even further to HNL, Waikiki, UHManoa, and Kalaeloa".
-How many multi-billions more will this cost and with what money and funding?
-Where is this information on future rail extensions cost in the 2008 DEIS?
-Will the electricity on Oahu come from burning fuel and barrels of oil at local HECO power plants to power "rail"?
-If "rail" will be powered by burning fuel and barrels of oil at HECO, how does this protect the environment? What are the energy costs for this new transit system per year?
-Will transit stations use and need even more power from HECO with lights, elevators, escalators, and T.O.D. shops and retail stores at each location?
-What is the amount of energy needed and used to build the new transit system?
-Where is the cost listed in the DEIS for the amount of energy required to build the new 20 mile transit?
-Is the data from the US Department of Energy correct, that suggests that on a national basis, average energy use per passenger mile is higher for transit than for automobile travel? According to the U.S. Department of Energy: Energy use per passenger mile (Btu) = 1,659 for fuel-efficient cars (Prius), 2,784 for rail transit.

This may be our final opportunity to give a public statement during this stage of the fixed-guideway process. My effort can hopefully be a useful commentary towards a question and answer seeking probe that I feel I must submit. As a full time Hawaii resident from the early 90's, I've grown to appreciate the natural beauty of Oahu and the panoramic views of a sleepy surfside mini-metropolis hugged by vintage suburban dwellings. I tried to sit down and write a comprehensive list of topics on the fixed-guideway "rail" transit issue. I didn't know where to start. The complex and twisted course the mayor and city council have begun has complicated the transit plan with political manipulation and a popularity contest involving high powered union-support coupled with large campaign contributions with a mix of mainland interests.
I hope Oahu is not evolving towards a society of socialistic reform with a loss of independence with local cattle and tamed worker bees packed & crowded into standing room only rail cars, and jokingly maybe even into a 'stinky' situation.
One of the more unusual events that unfolded was a few 4-4 tie votes, two weeks running, by the city council on Bill 80 ('06/'07) on the Transit Technology Selection. This was an interesting display of a split decision problem. An unavailable council member on the panel of 9, was unable to cast any tie-breaking vote, for or against, for two weeks of voting on the selection. 8 council members tied on 4-4 votes 5 or 6 times on different third reading versions. This should have been crafted to allow all available technologies & advanced modern innovations for fixed-guideway transit solutions submitting thru a transparent RFI/RFP process.

I hope all of the questions here can be answered in a fair and open transparent "sunshine" process for the benefit of the Hawaii public. Thank you. Cindy Kot 2/6/09

FOLD

Return Address
C. KOT
2317 WAIOMAO ROAD
HONOLULU, HI 96816



Department of Transportation Services
Attn: Honolulu High-Capacity Transit Corridor Project
City and County of Honolulu
650 South King Street, 3rd Floor
Honolulu, HI, 96813

STAPLE HERE

Honolulu High-Capacity Transit Corridor Project

Welcome to the Honolulu High-Capacity Transit Corridor Project's Public Hearing for the Draft Environmental Impact Statement/Section 4(f) Evaluation.

This public meeting and hearing has been designed to inform the public about the transit project, explain materials contained in the Draft EIS, answer questions from the public, and collect public input on project issues related to the Draft EIS, Section 106 of the National Historic Preservation Act, Section 4(f) of the U.S. Department of Transportation Act, and floodplains affected by the project.

Please review the project information and ask project staff any questions about the project that you might have. The Draft EIS is available on the project website at www.honolulutransit.org.

You may provide official comments in several ways. Here at this Public Hearing you may provide oral comments to a court reporter who will record them for the record or use this form to provide written comments. After the meeting, you may provide an on-line comment at www.honolulutransit.org or use this form to send a written comment to the Department of Transportation Services. All comments must be postmarked or received by January 7, 2009 in order for them to be included in the Final EIS.

Name: CORY KOT Address: 2317 WAIOMAO ROAD

Phone: 384-2355 HONOLULU, HI 96816

E-mail: _____

Comment(s):

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DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, 3RD FLOOR
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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT2/09-299007R

Mr. Cory Kot
2317 Waiomao Road
Honolulu, Hawaii 96816

Dear Mr. Kot:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address comments regarding the above-referenced submittal:

Responses to your comments will be provided in the same format as your letter.

- *As stated in Section 2.2.3 of this Final EIS, the NEPA Notice of Intent requested input on five transit technologies. A technical review process included the opportunity for public comment and was used in parallel with the alternatives analysis to select a transit technology. The process included a broad request for information that was publicized to the transit industry. Transit vehicle manufacturers submitted 12 responses covering all of the technologies listed in the Notice of Intent. An independent five-member technology panel composed of four transit experts and a transportation academic appointed by the City Council evaluated guided rubber-tire-on-concrete systems (e.g., Phileas bus system and VAL-type systems), monorail (which is a variation on rubber-tyred technology),*

steel-wheel-on-steel-rail systems, (e.g., light rail and rapid rail), and magnetic levitation (MAGLEV) . The panel considered the performance, cost, and reliability of the proposed technologies.
Proprietary technologies, meaning those technologies that would have required all future purchases of vehicles or equipment to be from a single manufacturer, were eliminated because none of the proprietary technologies offered substantial proven performance, cost, and reliability benefits compared to steel wheel operating on steel rail.

The panel accepted public comment twice as part of its review. By a four-to-one vote, the panel chose a steel wheel vehicle operating on steel rail system because it was considered safe, reliable, economical, and non-proprietary. Those results are documented in the panel's report to the City Council dated February 22, 2008 entitled "Independent Technology Selection Panel Report".

- *The Request for Proposal (RFP) provides information on the steel wheel on steel rail technology for which the City is soliciting bids.*

- *The Draft EIS only reports estimates of cost for those Build Alternatives addressed in the Final EIS document, namely three fixed guideway alternatives from East Kapolei to Ala Moana Center. The Project has logical termini and independent utility from any extensions that may be constructed in the future. The future extensions to East Kapolei, Salt Lake Boulevard, Waikiki, and UH Manoa are discussed in the cumulative impacts sections of Chapters 3 and 4 of the Final EIS. The future extensions are not part of the Project; thus, they are not required to be evaluated under Chapter 343 of the Hawaii Revised Statutes and NEPA. Under NEPA, environmental analysis is only required when there is a proposed action by a Federal agency. Here, because the future extensions are not proposed for implementation at this time, they are not part of the Project studied in the Final EIS. It would be premature to undertake an environmental analysis of the extensions (beyond the cumulative impacts analysis) because they are not part of the proposed action to be taken by the City and FTA. If the future extensions are proposed for implementation at some time in the future, environmental analysis of the extensions and appropriate alternatives will be undertaken at that time.*

- *The referenced RFP can be obtained from the Department of Budget and Fiscal Services, Division of Purchasing.*

- *All procedures have followed the City's procurement requirements, and no bidder's proposal was received prior to release of the pertinent RFP.*

- *The cost-effectiveness analysis considers whether the Project's benefit would justify its capital and operating costs. Cost-effectiveness is one of the key criteria that FTA uses to evaluate projects proposed for Section 5309 New Starts funding. The cost-effectiveness indices for the Project compared to the baseline is within the "medium" range established by FTA for its New Starts ratings, which,*

along with other considerations, is currently required to qualify for New Starts funding (Table 7-8 of the Final EIS). As shown in Table 6-1 of the Final EIS, the Project will cost $4.6 billion in 2009 dollars and $5.5 billion in inflated dollars, including finance charges. Please refer to Chapter 6 of the Final EIS.

- *Capital costs for the Project in the Final EIS are presented in Table 6-1 of the Final EIS. The total cost, including finance charges, will be $4.6 billion in 2009 dollars. This equates to a cost of $230 million per mile in 2009 dollars.*

- *The per-capita spending breakdown is not a requirement of the Draft or Final EISs. If we were to assume a conservative 50-year life span for the system (this type of system typically lasts longer than 100 years), then the cost per person would be about $100/year for a system that performs at a much higher level than any of the systems currently in place.*

- *Transportation spending in other states is not relevant to the issue at hand. The financial feasibility of this Project is discussed in Chapter 6 of the Draft and Final EISs.*

- *The cost effectiveness index has not been eliminated, but its contribution to the overall project rating has been reduced.*

- *Stations will be complete within the initial construction area at the opening of that area.*

- *As stated in Chapter 2 of the Final EIS, "the area of East Kapolei is undergoing development that will be a mixture of residential, recreational, educational, industrial, and commercial land uses.... As part of this development the immediate area is also planned for future Department of Hawaiian Home Lands housing development. Kroc Center, scheduled to open in 2010, will be a 15-acre family support, education, recreation, and cultural arts facility for the general public and will provide services for low-income children, seniors, and families. Projected year of opening (2019) ridership shows that the East Kapolei Station would have one of the highest boardings in the system." Figure 3-9 in the Final EIS also shows that the East Kapolei and UH West Oahu fixed guideway stations will have high ridership during the a.m. two-hour peak period.*

- *The fixed guideway system is designed to serve major destinations in the most heavily traveled corridor on Oahu, plus the area with the greatest expected growth. In 2000, 63 percent of Oahu's population and 80 percent of its jobs were located within the study corridor. By 2030, these distributions will increase to 69 percent of the population and 83 percent of the employment. As a result, it is anticipated that the rail transit system will be used by a wide cross section of the local population.*

- *A Fort Weaver Road alignment was evaluated and rejected in the Alternatives Analysis. It would have been the most expensive option for serving the Ewa*

area, and no space would have been available to provide park-and-ride and bus transfer facilities. Available funding is insufficient to extend to UH Manoa and Waikiki. The Project will connect to Ewa Beach via bus service from East Kapolei and to UH Manoa and Waikiki from Ala Moana Center.

Your preference for the Airport Alternative has been noted. While each of the alternatives discussed in the Draft EIS includes trade-offs between benefits and impacts, the Airport Alternative from East Kapolei to Ala Moana has been selected as the Preferred Alternative as described above. As compared to the alternatives discussed in the Draft EIS, the Airport Alternative will carry the most passengers, provide the greatest transit-user benefits, and result in the fewest vehicle hours of delay. It will provide access to employment centers at Pearl Harbor Naval Base and Honolulu International Airport and will serve the Salt Lake neighborhood with connecting bus service. Of the three Build Alternatives addressed in the Draft EIS, the Airport Alternative will have slightly less impacts to the natural and built environment analyzed in the Draft EIS. During the public comment period on the Draft EIS, the public overwhelmingly supported the Airport Alternative. Of the comments that specifically supported one of the alternatives, more than 75 percent were in support of the Airport Alternative. For more information this selection is discussed in Section 2.4 of the Final EIS. Since publication of the Draft EIS, design has been advanced, further analysis has been completed, and information has been added in response to comments on the Draft EIS and agency coordination. The Final EIS discusses the process that was used to select the Preferred Alternative, how comments were considered in the decion-making process, impacts and mitigation commitments.

- *The 1 percent referenced is an islandwide figure that includes all travel during the day, including short trips in neighborhoods and trips in the North Shore, Kaneohe, or Hawaii Kai, which are not directly served by the Project. The most visible benefit of transit is within a corridor and during the peak times of the day. Table 3-12 of the Final EIS shows daily islandwide trips, while Figure 3-11 in the Final EIS shows transit shares of home-based work trips during the a.m. two-hour peak period for key travel markets. As shown in Table 3-12, on a daily, islandwide basis, transit use is not expected to increase substantially. However, as shown in Figure 3-11, there is a substantial increase in transit trips during the a.m. peak period within the study corridor as a result of the Project. As stated in Section 3.4.2 of the Final EIS, for many travel markets, the transit share for trips under the Project will double or triple the share occurring under the No Build Alternative. For example, the commute-to-work transit share of the Kapolei to Downtown Honolulu travel market would increase from 23 percent under the No Build Alternative to 60 percent under the Project. In other words, more than half of the people going from Kapolei to Downtown for work in the morning will use transit with the Project, compared to only a quarter without the Project.*

- *Please see the response to the comment above.*

- *Chapter 6 of the Final EIS describes the financial resources anticipated to be needed to pay for the capital costs of the Project and for ongoing operating and maintenance costs. Capital costs of the Project, including finance charges, are expected to be fully paid for by a combination of FTA Section 5309 New Starts Funds from the Federal government and the General Excise and Use Tax surcharge revenues collected from 2007 through 2022 on Oahu. Operating and maintenance costs will be paid for from the same sources currently used for TheBus: Federal funding, fare revenues, and City revenues from the General and Highway Funds.*

- *The comment concerning convincing voters is not related to the project alternatives or effects.*

- *The comment concerning the waste water treatment system is not related to the project alternatives or effects.*

- *The Alternatives Analysis Report presented an estimated capital cost (including finance charges) of $5.071 billion in year-of-expenditure dollars for the Airport Alternative. The Final EIS presents an estimated capital cost for this alternative of $5.513 billion, including finance charges. It is inaccurate to characterize the difference between these two estimates as being "billions." The increase in cost is primarily due to design revisions.*

- *As stated previously, the Draft EIS only reports estimates of cost for those Build Alternatives addressed in the Final EIS document, namely three fixed guideway alternatives from East Kapolei to Ala Moana Center. Planned extensions to West Kapolei, Salt Lake Boulevard, UH Manoa, and Waikiki would be evaluated under a separate environmental review process when they are proposed for implementation.*

- *See response in previous bullet.*

- *The transit system will require approximately 17.9 megawatts (MW) of electrical power for operation. This represents 1 percent of the existing combined electrical-generating capacity on Oahu by the Hawaiian Electric Company (HECO) and independent power producers. HECO is currently soliciting proposals for non-firm renewable-energy generating capacity up to 100 MW that would commence operation within the 2010 to 2014 timeframe. As discussed in Section 4.11.3 of the Final EIS, the Project will consume approximately 1 to 2 percent of the total projected electricity generated on Oahu in 2030.*

- *The Project is anticipated to reduce daily transportation energy demand by approximately 3 percent compared to the No Build Alternative.*

- *The cost of operating the stations is included in the operating and maintenance cost analysis in Chapter 6 of the Final EIS. The entire transit system, including the lighting, elevators, and escalators at stations, is expected to consume*

approximately 1 to 2 percent of the total projected electricity generated on Oahu in 2030. Additional electricity required to develop and maintain transit-oriented development (TOD) and retail development is not directly related to the Project. TOD has been identified as an Indirect Effect in Section 4.19.2 of the Final EIS.

- *As presented in Section 4.18.6 of the Final EIS, "Construction of at-grade high-capacity transit systems generally requires 20,000 one million British thermal units (MBTUs) of energy per track mile (Caltrans 1983), including track and power systems. Because the guideway is elevated, an additional 150,000 MBTUs of energy per track mile will be required to construct the elevated structure."*

- *The energy cost for construction is built into the cost of materials, fuel, and personnel to construct the Project. For example, construction contracts typically carry escalation clauses for fuel oil, asphalt, and concrete to account for fluctuations in the cost of these materials due to changes in raw energy costs.*

- *Statistics for energy consumption for rail at full capacity and specific gasoline hybrid passenger cars are not available from the Department of Energy. The Department of Energy does publish statistics for average transit rail energy consumption (2,784 BTUs per passenger mile) and cars (3,512 BTUs per passenger mile). As the Department of Energy advises, great care should be taken when comparing modal energy intensity data among modes. Because of the inherent differences among the transportation modes in the nature of services, routes available, and many additional factors, it is not possible to obtain truly comparable national energy intensities among modes. These values are averages and there is a great deal of variability even within a mode.*

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
Creation Date :	12/18/2008
Creator Affiliation :	
First Name :	Glenn
Last Name :	Kuhia Jr
Business/Organization :	
Address :	
Alternative Preference :	
Apt./Suite No. :	
City :	
State :	HI
Zip Code :	96706
Email :	
Telephone :	
Telephone Extension :	
Add to Mailing List :	None
Submission Method :	Website
Other Submission Method :	
Submission Date :	12/18/2008
Submission Content/Notes :	What ever happened to making Kapolei the second city and wanting to keep west side residents on the west side instead of giving them an alternative to going into town? Why cant we double deck the existing freeway system and open it up to the public for free? no hot lanes or tolls just a double decker freeway. i recently read there will be massive development around all the rail stops, why encourage development and add more people and cars to the road.

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, 3RD FLOOR
HONOLULU, HAWAII 96813
Phone: (808) 768-8305 • Fax: (808) 768-4730 • Internet: www.honolulu.gov

MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT10/09-338266

Mr. Glenn Kuhia, Jr.
(No address provided)

Dear Mr. Kuhia:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraph addresses your comments regarding the above-referenced submittal:

The Project supports the development of Kapolei and the plans for development of the Ewa area and is consistent with the Regional Development Plans. Page 4-10 of the Draft EIS states, "The Ewa region is a rural and agricultural area that is undergoing urbanization and includes Kapolei, which is developing as Oahu's 'second city'. The Waianae terminal station for the Project is at East Kapolei. The Waianae end of the Project would serve the area where both population and employment are forecasted to grow by approximately 400 percent."

Regional planning, conducted by the OahuMPO, considered a wide range of transportation options in development of the Oahu Regional Transportation Plan (ORTP). A fixed guideway transit system was identified as being an effective means of improving future mobility. The ORTP also identifies several highway-system improvements, many of which are listed in Table 2-3 of the Draft EIS. The population of Oahu is projected to increase by 2030; that increase in population will need to be accommodated with additional housing and employment.

The FTA and DTS appreciate your interest in the Project. The Final EIS has been issued in conjunction with the distribution of this letter. You may view the Final EIS on the Project website at www.honolulutransit.org. You may request a DVD of the Final EIS and additional content through the "Contact Us" tab on the website or by calling the Project hotline at 566-2299. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Honolulu High-Capacity Transit Corridor Project

RECEIVED
08 FEB 27 P3:55
CITY & COUNTY OF HONOLULU
DEPARTMENT OF TRANSPORTATION SERVICES

Welcome to the Honolulu High-Capacity Transit Corridor Project's Public Hearing for the Draft Environmental Impact Statement/Section 4(f) Evaluation.

This public meeting and hearing has been designed to inform the public about the transit project, explain materials contained in the Draft EIS, answer questions from the public, and collect public input on project issues related to the Draft EIS, Section 106 of the National Historic Preservation Act, Section 4(f) of the U.S. Department of Transportation Act, and floodplains affected by the project.

Please review the project information and ask project staff any questions about the project that you might have. The Draft EIS is available on the project website at www.honolulutransit.org.

You may provide official comments in several ways. Here at this Public Hearing you may provide oral comments to a court reporter who will record them for the record or use this form to provide written comments. After the meeting, you may provide an on-line comment at www.honolulutransit.org or use this form to send a written comment to the Department of Transportation Services. All comments must be postmarked or received by January 7, 2009 in order for them to be included in the Final EIS.

Name: KATHERINE KUPUKAA Address: 95-685 MAKAUNULAU ST

Phone: 623-7070 MILILANI TOWN, HI 96789

E-mail: _____

Comment(s):

Kamehameha Hwy is 1 of only 2 corridors from east to west. It is heavily used and congested especially during peak traffic hours. more so in the afternoons. There is not enough lanes for the amount of vehicles traveling. To eliminate lanes would cause an unimaginable disaster. The military facilities would be impacted There is an overpass (H-1) Hawaiian Electric

and Sears Distribution. Is the train track going to be above the H-1. There are about 14 bus stops from Home Depot in Pearl City to the airport. I have caught bus #62 route. There are not hundreds of people waiting at the bus stops. Ridership is over inflated. The City is doing a great disservice to the citizens of the C & C of Honolulu by proceeding with this project. This project provides very little benefit if any and will not solve the congestion problem.

FOLD

Return Address

Place Postage Here

Department of Transportation Services
Attn: Honolulu High-Capacity Transit Corridor Project
City and County of Honolulu
650 South King Street, 3rd Floor
Honolulu, HI, 96813

STAPLE HERE

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, 3RD FLOOR
HONOLULU, HAWAII 96813
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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

KENNETH TORU HAMAYASU
DEPUTY DIRECTOR

June 11, 2010

RT2/09-298754R

Ms. Katherine Kupukaa
95-685 Makaunulau Street
Mililani, Hawaii 96789

Dear Ms. Kupukaa:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

1. *Concern about travel lanes removal*

The number of traffic lanes along Kamehameha Highway in Pearl City (three lanes in each direction) will remain the same before and after construction of the fixed guideway. During construction, one lane may be temporarily closed during peak-travel periods and additional lanes may be temporarily closed during off-peak travel periods. Construction-related procedures that may require temporary road closures are described in Section 3.5.3 in the Final EIS.

Travel lanes will not be taken away along Dillingham Boulevard as a result of the Project. As shown in Tables 3-9 and 3-10, roadway conditions on Dillingham Boulevard will improve as a result of the Project.

The modeling conducted for the Draft and Final EISs considered all roadway projects listed in the Oahu Regional Transportation Plan (ORTP), including a Nimitz Flyover and mitigation measures on the H-1 Freeway. Table 2-4 in the Final EIS lists committed projects from the

ORTP that were included in all modeling results. As shown in Tables 3-9 and 3-10 in the Final EIS, roadway conditions will improve with the Project.

2. Concern about adequate demand and ridership for the Project

As shown in Table 3-18 in the Final EIS, transit ridership will be 44 percent higher with the Project compared to the No Build Alternative. This includes ridership on the guideway as well as TheBus.

As identified in the Section 3.2.1 on Analytical Tools and Data Sources of the Final EIS, transit ridership forecasts for rail and bus service are based on a travel demand forecasting model used by the Oahu Metropolitan Transportation Organization (OahuMPO) for the Oahu Regional Transportation Plan. The OahuMPO model is based on "best practices" for urban travel models in the U.S. and is consistent with consultation with FTA. As indicated in the Final EIS, this modeling approach has been effective in estimating ridership levels in other areas such as Los Angeles County, Salt Lake City, and the Denver region in the last 10 years.

The travel demand forecasting model has been refined since the Draft EIS was published by adding an updated air passenger model (which forecasts travel in the corridor related to passengers arriving or departing at Honolulu International Airport), defining more realistic drive access modes to project stations, and recognizing a more robust off-peak non-home-based direct-demand element (trips that do not originate or end at home) based on Honolulu travel surveys. The Final EIS reflects updated ridership numbers resulting from model refinement.

The Project is one of the first in the country to design and undertake an uncertainty analysis of this type of travel forecast. The uncertainty analysis evaluates the variability of the forecast by establishing likely upper and lower limits of ridership projections. FTA has worked closely with the City during this effort. A variety of factors were considered in the uncertainty analysis. Given the factors considered, the anticipated limits for guideway ridership in 2030 are expected to be between 105,000 to 130,000 trips per day, bracketing the official forecast of 116,000 riders a day used for all calculations. Currently, there are over 250,000 boardings per day on buses.

3. Concern about congestion

As shown in Table 3-14 in the Final EIS, the Project will reduce congestion (as measured by vehicle hours of delay) by 18 percent compared to the No Build Alternative. Tables 3-9 and 3-10 in the Final EIS show an improvement in vehicles per hour on Kamehameha Highway during both the a.m. and p.m. peak hour.

The Project responds to unmet demand for transit infrastructure that accommodates current residents and visitors and anticipates future demographic trends. The challenge is to reconcile the need to provide a public transportation system that is safe, accessible, and convenient while preserving aspects of the community that are integral to its character and values. This project will enable the City to concentrate growth in existing urbanized and adjacent areas on Oahu in the decades to come. By reducing the overall number of vehicle miles traveled through expanded public transportation, DTS and FTA are promoting environmental sustainability, congestion reduction, and increased mobility for a diverse population, which will improve the overall quality of life for the majority of Honolulu residents and visitors.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Honolulu High-Capacity Transit Corridor Project

Welcome to the Honolulu High-Capacity Transit Corridor Project's Public Hearing for the Draft Environmental Impact Statement/Section 4(f) Evaluation.

This public meeting and hearing has been designed to inform the public about the transit project, explain materials contained in the Draft EIS, answer questions from the public, and collect public input on project issues related to the Draft EIS, Section 106 of the National Historic Preservation Act, Section 4(f) of the U.S. Department of Transportation Act, and floodplains affected by the project.

Please review the project information and ask project staff any questions about the project that you might have. The Draft EIS is available on the project website at www.honolulutransit.org.

You may provide official comments in several ways. Here at this Public Hearing you may provide oral comments to a court reporter who will record them for the record or use this form to provide written comments. After the meeting, you may provide an on-line comment at www.honolulutransit.org or use this form to send a written comment to the Department of Transportation Services. All comments must be postmarked or received by January 7, 2009 in order for them to be included in the Final EIS.

Name: KATHERINE KUPUKAA Address: 99-685 MAKAUNULAU ST

Phone: 623-7070 MILILANI TOWN, HI

E-mail: _____ 96789

Comment(s):

Dillingham Blvd is 1 of 4 corridors, in the east/west direction to Honolulu. It is heavily congested throughout the day because there is not enough lanes. To eliminate lanes for the train, track is unthinkable. The businesses would also be impacted not only with loss of business but loss of property space. There are about 12 bus stops

from Middle St to King and Dillingham Blvd. There are not hundreds of people waiting at these bus stops. People are not going to give up driving their cars and catching the train. This project should be stopped immediately. The State is coming up with projects to reduce traffic congestion with more lanes on H-1 and Nimitz Hwy.

FOLD

Return Address

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Department of Transportation Services
Attn: Honolulu High-Capacity Transit Corridor Project
City and County of Honolulu
650 South King Street, 3rd Floor
Honolulu, HI, 96813

RECEIVED
FEB 6 P 2:39
DEPT OF TRANSPORTATION SERVICES

STAPLE HERE

Status :	Initial Action Needed
Creation Date :	1/4/2009
Creator Affiliation :	
First Name :	Sean
Last Name :	Kuranishi
Business/Organization :	
Address :	2818-A Keama Pl.
Alternative Preference :	
Apt./Suite No. :	
City :	Honolulu
State :	HI
Zip Code :	96822
Email :	sean-kuras@hotmail.com
Telephone :	
Telephone Extension :	
Add to Mailing List :	Both
Submission Method :	Website
Other Submission Method :	
Submission Date :	01/04/2009
Submission Content/Notes :	Does the rail transit system include plans for expansion and growth? I like and support the rail system a great deal but I believe that it should be available to many more people than the original plans include, especially if we all need to pay for it. I agree that west Oahu needs it the most but I would like to see it include the airport, Waikiki, UH Manoa, Hawaii Kai and possibly Kaneohe/Kailua as well. Also, I hope that the Bus system ties into the schedule of the Rail system. Making things more efficient will bring greater success to all parties. Thank you for listening and good luck.

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, 3RD FLOOR
HONOLULU, HAWAII 96813
Phone: (808) 768-8305 • Fax: (808) 768-4730 • Internet: www.honolulu.gov

MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-332362

Mr. Sean Kuranishi
2818-A Keama Place
Honolulu, Hawaii 96822

Dear Mr. Kuranishi:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

Your preference for the Airport Alternative has been noted. While each of the alternatives discussed in the Draft EIS includes trade-offs between benefits and impacts, the Airport Alternative from East Kapolei to Ala Moana has been selected as the Preferred Alternative as described above. As compared to the alternatives discussed in the Draft EIS, the Airport Alternative will carry the most passengers, provide the greatest transit-user benefits, and result in the fewest vehicle hours of delay. It will provide access to employment centers at Pearl Harbor Naval Base and Honolulu International Airport and will serve the Salt Lake neighborhood with connecting bus service. Of the three Build Alternatives addressed in the Draft EIS, the Airport Alternative will have slightly less impacts to the natural and built environment analyzed in the Draft EIS. During the public comment period on the Draft EIS, the public overwhelmingly supported the Airport Alternative. Of the comments that specifically supported one of the alternatives, more than 75 percent were in support of the Airport Alternative. For more

information this selection is discussed in Section 2.4 of the Final EIS. Since publication of the Draft EIS, design has been advanced, further analysis has been completed, and information has been added in response to comments on the Draft EIS and agency coordination. The Final EIS discusses the process that was used to select the Preferred Alternative, how comments were considered in the decision-making process, impacts and mitigation commitments.

The Project has logical termini at East Kapolei and Ala Moana Center and independent utility from any extensions that may be constructed in the future. The future extensions to West Kapolei, Salt Lake Boulevard, Waikiki, and UH Manoa are discussed in the cumulative impacts sections of Chapters 3 and 4 of the Final EIS; however the future extensions are not part of this Project, thus they are not required to be evaluated under Chapter 343 of the Hawaii Revised Statutes and NEPA. Under NEPA, environmental analysis is only required when there is a proposed action by a Federal agency. Here, because the future extensions are not proposed for implementation at this time, they are not part of the Project studied in the Final EIS. It would be premature to undertake an environmental analysis of the extensions (beyond the cumulative impacts analysis) because they are not part of the proposed action to be taken by the City and FTA. If the future extensions are proposed for implementation in the future, environmental analysis of the extensions and appropriate alternatives will be undertaken at that time. Other extensions, such as Central Oahu, have been considered and may be undertaken at some point after the current Project.

TheBus system will be altered to provide improved connections with the rail system. Bus routes or portions of bus routes will be altered or eliminated to reduce duplication of services with the rail system. Certain local bus routes will be rerouted to provide frequent and reliable connections to the nearest rail station. Because of the high frequency of rail service (every three minutes during peak periods and every ten minutes during off-peak periods), riders transferring from buses to trains will experience minimal wait times. Riders transferring from trains to buses will benefit from improved frequencies on existing bus routes serving stations. In addition, several new bus routes with high frequencies will be provided as feeders to the rail system. Since these routes will primarily operate in residential areas, they will provide greater reliability versus routes operating along congested arterials. Additional information regarding existing and future bus routes, including frequency, is included in Appendix D of the Final EIS.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Jaime Kurosawa
99-1440 Aiea Heights Drive #33
Aiea, Hawaii 96701

Date: January 5, 2009

Mr. Wayne Yoshioka
Director
Department of Transportation Services
City and Count of Honolulu
650 South King Street, 3rd floor
Honolulu, HI 96813

Reference: Rail Draft EIS

Dear Mr. Yoshioka,

I am a concerned tax payer and I am also against the rail. I feel that I was misled and misinformed. The fact that the EIS draft was made public a few days before the election concerns me because of the many people who cast their vote via absentee/early ballot. The vote for and against rail was too close and I feel that if the public was given this information sooner, the vote could have possibly turned out different.

I am very angry and would like to know in writing how the City and County can let this kind of thing happen?

Please respond to me in writing.

Sincerely,

Jaime Kurosawa

Jaime Kurosawa

RECEIVED
09 JAN 8 P12:24
DIRECTOR'S OFFICE
DEPT OF
TRANSPORTATION SERVICES

Cc: Ted Matley FTA Region IX 201 Mission St. Suite 1650 San Francisco, CA 94105
Cc: Governor Linda Lingle Hawaii State Capitol 415 S. Beretania St. 5th Floor Honolulu, HI 96813

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, 3RD FLOOR
HONOLULU, HAWAII 96813
Phone: (808) 768-8305 • Fax: (808) 768-4730 • Internet: www.honolulu.gov

MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT1/09-294739R

Mr. Jaime Kurosawa
99-1440 Aiea Heights Drive, #33
Aiea, Hawaii 96701

Dear Mr. Kurosawa:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraph addresses your comments regarding the above-referenced submittal:

The NEPA process, including publication of the Draft EIS, was started in 2007. When in the summer of 2008 the City Council decided to place the measure on the ballot, the schedule for the Draft EIS had already long been established. Various design, agency coordination, and approval steps were required prior to publication of the Draft EIS. In the end, the normal distribution schedule was accelerated by FTA and the City to ensure availability of the information prior to the general election. The NEPA process is independent of the electoral process.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this

letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

29274

Jeremy Lam, M.D.

Kapiolani Medical Center
1319 Punahou Street, Suite 1140
Honolulu, Hawaii 96826
Telephone 944-1844

Dear Community Leaders,

I am a Honolulu resident and I am very concerned the following questions have not been properly addressed. I know you folks have your minds set on implementing this expensive project in the face of the deteriorating economy. Please know that many of us do not want you to proceed with the project until all these issues are thoroughly addressed.

1. The bus routes will change. What happens to your route? What happens to express buses? 2. Lanes will be taken away, some temporarily for construction and some permanently. Where are those lane closures and what is their duration? Are there traffic rerouting plans? 3. Will there be bike racks on the train and where will they be located? Will bikes be allowed on the train? Will there be a place for surfboards? What about luggage? What about construction workers' tools? Will there be a place for people to put large items they purchase at a big box retailer? What's the size limitation? 4. Will there be washrooms at the stations? How about convenience stores, vending machines? Will the platforms have seats? How many? 5. Under land use, Aloun farms needs to relocate. Is that possible? Where will they go? 6. A relatively simple job of sewer upgrades in Kailua and Kapiolani lead to the loss of businesses and jobs. Are details provided about similar effects during the construction of the rail? 7. Is there a detailed plan for the effect of rail construction on water, sewer, gas and electric utilities? Will there be disruptions of service? Who pays for all these? 8. About $107 million will be spent on the soft costs of this project. This "paperwork" cost is rather exorbitant for a single 20 mile rail line. How did $107 million get spent? 9. The DEIS list of preparers for technical content shows that it was done almost exclusively with out-of-Hawaii engineers, planners and specialists. H-3 freeway was designed mostly with Hawaii based engineers. If Hawaii engineers are not able to design rail, who will supervise and build this unfamiliar-to-Oahu infrastructure? 10. Rail construction involves unique skills and certifications that Hawaii construction workers do not have. How will this be addressed? 11. The city has declared that in many cases only a portion of a parcel needs to be condemned and taken away. Can the business survive with the remaining portion? Are they forced to mandatory downsizing and some loss of employment? 12. There are 16 schools that are adjacent to the alignment. Will the overhead structure, the continuous high current exposure and the intermittent noise and vibration affect the learning environment? Is it prudent to relocate the schools? 13. Does rail fit our Hawaiian Sense of Place? How was the impact to tourism and local quality of life by a large elevated structure through town been assessed? 14. Does the DEIS address the impacted vistas and scenery? Are the aesthetics of the structure and each station explained and presented adequately? 15. What will happen in the event of a hurricane? Will the train operate? The train in Houston was shut down for 10 days due to hurricane Ike. 16. BART in the Bay Area uses rail cars made of aluminum to combat corrosion. Is the city's position that corrosion is not an issue? 17. It appears that General Excise Tax surcharge proceeds for rail will be much lower than expected for at least four years in a row. How is this deficit going to be made up? 18. If ridership turns out to be lower than forecast, then what? If the city is forced to provide free train rides like in Puerto Rico, how is the shortfall going to be covered? 19. I heard that the Ala Moana station will now be at a lower elevation, at the west end of Kona Street and not above Nordstrom's. What is the exact plan for the Ala Moana Center station and how is the train going to Waikiki and UH afterwards? 20. Starting construction in Kapolei makes little sense. It may be expeditious and convenient but it is not smart. Why can't a temporary rail yard be established near the airport or Aloha Stadium and build rail east into the city and west out to Kapolei simultaneously?

Sincerely,

Jeremy Lam, MD, 2230 Kamehameha Avenue, Honolulu, HI 96822 12/22/08

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, 3RD FLOOR
HONOLULU, HAWAII 96813
Phone: (808) 768-8305 • Fax: (808) 768-4730 • Internet: www.honolulu.gov

MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT10/09-336145

Mr. Jeremy Lam
2230 Kamehameha Avenue
Honolulu, Hawaii 96822

Dear Mr. Lam:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

This letter will address your comments in the same format as submitted.

1) *As indicated in Chapter 3 of the Final EIS, bus service will be enhanced with the Project and the bus network will be modified to coordinate with the fixed guideway system. Some existing routes, including peak-period express buses, will be altered or eliminated to reduce duplication of services provided by the fixed guideway system. Buses removed from service in the study corridor will be shifted to service in other parts of Oahu. Existing and future bus routes, including frequencies, are presented in Appendix D of the Final EIS.*

2) *Travel lanes on roadways will only be closed temporarily during construction. Table 3-27 in the Final EIS presents information on construction-related lane closures during peak periods. Additional lane closures may be necessary during off-peak periods. The specific duration of construction closures will be defined by the contractor working at the location, but the City will impose parameters to minimize impacts on local residents and businesses. Detours will also be specified for times when roadway capacity is temporarily impaired by construction activities. Most of this information will be in a Maintenance of Traffic Plan that will outline the requirements contractors will have to adhere to in their*

work. As shown in Table 3-21 in the Final EIS, travel lanes will not be permanently taken away by the Project.

3) *Chapter 3 notes that all stations will provide bike racks. Rail vehicles will be designed to accommodate bicycles, luggage, and surfboards, as long as these items will not interfere with the safety or comfort of other passengers and will be regulated according to a policy to be developed. Construction workers' tools and large items would follow the same guidelines.*

4) *Each station will have a secured public restroom. Patrons will ask the station attendant for access to the restroom. DTS does not intend to compete with private enterprise by placing retail within stations. Final internal configurations of stations, including the location and amount of seating, will be completed as station planning is finalized.*

5) *One of the two alternatives for a maintenance and storage facility is located in an agricultural district. The other site option is near Leeward Community College on the site of a former Navy fuel drumming operation. This is the preferred site, and the City has been working with the Navy and the Department of Hawaiian Home Lands to acquire it. If the site near Leeward Community College is acquired, the impact on agricultural lands on Oahu will be much less than is described in the Final EIS. Aloun Farm's headquarters, located at the other site, would not have to move if the Navy drum site is acquired. Farm operators that are affected by the Project will be given as much information as possible so they can best plan their productive use of the leased lands.*

6) *An analysis of the impacts to businesses during construction is provided in Section 4.18.1 of the Final EIS and in Section 5.2.2 of the Economics Technical Report. This report is available at the City and County of Honolulu and DTS offices, as well as on the Project website (www.honolulutransit.org). The primary impacts are anticipated to result from inconveniences and disruptions to adjacent residents, businesses, and business customers that are inherent in any major construction project. These include the following:*

   - *Presence of construction workers and materials*
   - *Temporary road closures and traffic diversions*
   - *Temporary reductions in parking availability*
   - *Airborne dust, noise, and vibrations*
   - *Businesses' loss of visibility to customers*

   Section 4.18.1 of the Final EIS states that proposed mitigation to reduce adverse economic hardships for existing businesses along the project alignment during construction activities may include the following:

   - *Coordinate construction planning and phasing with nearby property owners and businesses*
   - *Develop a public involvement plan prior to construction to inform business owners of the construction schedule and activities*

- *Minimize the extent and number of business, jobs, and access affected during construction*
- *To the extent practicable, coordinate the timing of temporary facility closures to minimize impacts to business activities, especially those related to seasonal or high sales periods*
- *Minimize, as practical, the duration of modified or lost access to businesses*
- *Provide signage, lighting, or other information to indicate that businesses are open*
- *Provide public information (press releases, newsletters) regarding construction activities and ongoing business activities, including advertisements in print and on television and radio*
- *Phase construction in each area so as to maintain access to individual businesses for pedestrians, bicyclists, passenger vehicles, and trucks during business hours and important business seasons*
- *Provide advance notice if utilities will be disrupted and schedule major utility shutoffs during non-business hours*

Overall, the Project is projected to increase jobs in the nine years of construction to an average of about 10,000 per year, see Table 4-35 in Final EIS.

7) *Construction activities for the majority of the transit system are similar to roadway and building construction. Appendix E of the Final EIS details construction methods that are widely used for both rail transit and elevated highway construction and were employed on the H-3 Freeway. Experienced labor is locally available. A limited number of specialists will be needed to work with locally available labor in certain areas, such as transit power and signaling specialists working with local electricians to install system equipment.*

8) *The "soft costs," or professional services costs for the Project, include all professional, technical, and management services related to the design and construction of fixed infrastructure during the Preliminary Engineering, Final Design, and construction phases of the Project. This includes environmental work, design, engineering, and architectural services; specialty services, such as safety or security analyses; value engineering; risk assessment; cost estimating; scheduling; before and after studies; ridership modeling and analyses; auditing; legal services; administration; management; and other services provided by agency staff or outside consultants. As shown in Table 6-1 of the Final EIS, professional services costs for the Project are $810 million in Fiscal Year 2009 dollars. As a percentage of the construction cost of the Project, this is consistent with experiences on other projects around the country.*

9 and 10) *While there are many members of the team from other places, the majority of the planners and designers reside in Honolulu. (Note: the H-3 Freeway was designed by the same firm engaged in the fixed guideway project.) Construction activities for the majority of the transit system are similar to roadway and building construction. The majority of the Project work is construction of the guideway. This is not a specialized skill that requires labor from other places. Appendix E of the Final EIS details construction methods that are widely used for both rail transit and elevated highway construction and were employed on*

the H-3 Freeway. Experienced labor is locally available. A limited number of specialists will be needed to work with locally available labor in certain areas, such as transit power and signaling specialists working with local electricians to install system equipment.

11) It is true that in many locations only partial property acquisitions are necessary. Every property acquisition is unique and will be addressed on a case-by-case basis. All property acquisitions will be conducted consistent with Federal and State regulations. Section 4.4.3 of the Final EIS states, "a partial acquisition typically is either a narrow strip of land or a more substantial portion of a large parcel. It is assumed that for the properties that will be partially acquired, existing land uses will not change."

12) There will be no noise impacts to schools along the Airport Alternative alignment. The Project will have an integrated noise-blocking parapet wall at the edge of the guideway structure that extends for 3 feet above the top of the rail and a system specification for vehicles with wheel skirts.

13 and 14) The ongoing station area planning process involves numerous aspects of transit system design. The process addresses design and planning issues in an integrated manner and focuses on the characteristics and preferences of the communities adjacent to each station. As discussed in Section 8.4 of the Final EIS, the City and County of Honolulu is also conducting workshops with communities that will have rail stations. The purpose of the workshops is to engage the public about rail stations and provide opportunities to residents to contribute ideas about the appearance of station entryways in their areas. Ideas generated at the workshops will be incorporated into the station design process. For more information and to get involved in this process, please visit the project website at www.honolulutransit.org.

Guideway and column materials and surface textures will be selected in accordance with generally accepted architectural principles to achieve effected integration between the guideway and its surrounding environment. Landscaping and streetscape improvements will mitigate potential visual impacts.

The island's unique visual character and scenic beauty were considered in the visual and aesthetic analysis presented in the Draft and Final EISs. The Project will be set in an urban context where visual change is expected and differences in scales of structures are typical. The visual effects on Honolulu's downtown are discussed under the "Kalihi to Ala Moana Center Landscape Unit" heading in Section 4.8.3 of the Final EIS. The following measures will be included with the Project to minimize negative visual effects and enhance the visual and aesthetic opportunities that it creates:

- *Develop and apply design guidelines that will establish a consistent design framework for the Project with consideration of local context.*
- *Coordinate the project design with the City's transit-oriented development program within the Department of Planning and Permitting.*
- *Consult with the communities surrounding each station for input on station design elements.*
- *Consider specific sites for landscaping and trees during Final Design when plans for new plantings will be prepared by a landscape architect.*

The Project will provide users, including tourists, with expansive views from several portions of the corridor by elevating riders above highway traffic, street trees, and low structures adjacent to the alignment. In Section 4.8.3 of the Final EIS, specific environmental, architectural, and landscape design criteria are listed that will help minimize visual effects of the Project.

With the Project, visitors and residents will benefit by having more transportation options. Table 3-13 in the Final EIS shows daily person transit trips by purpose, broken down for residents and visitors. As this table shows, transit trips for both groups increase with the addition of the Project compared to the No Build Alternative. Daily resident person trips by transit increase 24 percent with the Project compared to without, while daily visitor person trips by transit increase 19 percent with the Project compared to without the Project in 2030. As stated in Section 3.4.2 of the Final EIS, approximately 9,900 visitors are expected to use the system daily, of which 1,800 are to or from the airport.

15) *As discussed in the Geology, Soils, Farmlands, and Natural Hazards Technical Report, the guideway and other structures will be designed and constructed to withstand wind forces from tropical storms. Some piers and stations will be located on floodplain, but no increased hazards are anticipated because the guideway and stations will be elevated. The system will have an upper limit on operating wind speed. Vehicles will be stored during events that exceed the operating limit.*

    Since trains and rail stations will be electrically powered, the system's infrastructure is being designed to handle service disruptions. For example, trains will draw power from many points along the route, so an outage in a few areas should not disrupt service. If electrical power is lost system-wide, then train brakes are designed to stop the rail cars even without power. Lights will stay on in trains and stations; backup batteries will provide lighting for several hours. The train operations center will communicate with passengers via the public address system and intercom to provide guidance. If power is restored within a short time, service will resume. With a prolonged outage, the operations center will direct passengers to exit the trains and walk along a lighted emergency walkway on the guideway to the nearest station. For those unable to exit rail cars, help will be provided by emergency responders and transit staff. Passengers will be met at the train station by a coordinated response from emergency responders and city transportation workers.

16) *Bay Area Rapid Transit (BART) vehicle bodies are made of aluminum. The BART system, however, is a steel-wheel-on steel-rail system just like the one proposed for Honolulu. The vehicle itself has not yet been designed, so it could be made of aluminum or another equally effective material. Corrosion has not been a problem in any system similar to that proposed for Honolulu. In island environments, volcanic areas, and regions of high humidity, there is no concern about corrosion of the steel wheels and steel rails. Nevertheless, corrosion is part of the design considerations used to ensure that the system is as good as possible.*

    Corrosion-control measures will be applied to the Project's fixed-steel facilities and neighboring utility structures to provide proper operation over their lifetime. These measures include the following:

    1. *Protective coating specification for steel aerial structures*

2. *Coating specification for stations*

3. *Preventive measures against stray current corrosion*

4. *Corrosion-control design of transit underground utilities and neighboring utilities owned by others*

17) *While General Excise and Use Tax (GET) surcharge collections have declined, so too have the costs of the Project. The financial discussions in the Final EIS address concerns about the uncertainties associated with financial markets. The capital plan for the Project is presented in Section 6.3 of the Final EIS, which includes a description of the amount of funding anticipated from various sources. The capital plan takes the current economic downturn into account. Section 6.6 of the Final EIS describes risks and uncertainties associated with these funding assumptions. The financial plan is a dynamic document that will be updated as conditions warrant.*

18) *Ridership discussions in the Final EIS address concerns about the uncertainties associated with ridership. Ridership projections for the forecast year of 2030 have been developed using the travel demand model used by the Oahu Metropolitan Planning Organization (OahuMPO), which was calibrated against collected traffic and transit ridership information and then validated against recent counts to be sure it properly represents travel activity in the transportation system (Section 3.2.1 of the Final EIS). An on-board transit survey was completed in December 2005 and January 2006, and the latest socioeconomic information available as of October 2008 was incorporated. Traffic counts were collected in 2005, 2007, and 2008. The OahuMPO model is based on "best practices" for urban travel models in the U.S. and consistent with consultation with the FTA. The model is updated approximately every five years to reflect changes in land use, socioeconomic conditions, and transportation network improvements. The model is approved by the OahuMPO Technical Advisory Committee. The model is based upon a set of realistic input assumptions regarding land use and demographic changes between now and 2030 and expected transportation levels-of-service on both the highway and public transit system. Based upon the model and these key input assumptions, approximately 116,000 trips per day are expected to use the rapid transit system on an average weekday in 2030. Since the Draft EIS was published, the travel demand model has been refined by adding an updated air passenger model (which forecasts travel in the corridor related to passengers arriving or departing at Honolulu International Airport), defining more realistic drive access modes (driving alone or car pooling) to project stations and recognizing a more robust off-peak non-home-based direct demand element (trips that do not originate at home) based on travel surveys in Honolulu.*

The Project is one of the first in the country to design and undertake an uncertainty analysis of this type of travel forecast. The uncertainty analysis evaluates the variability of the forecast by establishing probabilistic upper and lower limits of ridership projections. FTA has worked closely with the City during this effort. A variety of factors were considered in the uncertainty analysis. Given all the factors considered, the anticipated limits for guideway ridership in 2030 is expected to be between 105,000 and 130,000 trips per day, bracketing the official forecast of 116,000 riders a day used for all calculations. A unified fare structure is planned, similar to the current structure for TheBus.

By City Council's current policy, ridership on the entire transit system is expected to pay for between 27 and 33 percent of the annual operating and maintenance costs. The City

Council will adjust the fare to maintain that level of revenue. The balance of the operating costs will be part of the City's annual budget, which includes sources currently used for TheBus: Federal funding and subsidies from the City's General and Highway Funds.

The amount of service provided will be scaled to generally match the demand. If the service attracts fewer riders than expected, then less service may be provided by adjusting headways or train length, thereby resulting in lower-than-expected operating and maintenance costs. There is no plan to offer free ridership on the fixed guideway system.

19) *The Ala Moana Center Station will be at about a 40-foot level just Koko Head of Kona Iki Street. The 35-foot station at Ala Moana Center is a practical solution for the first construction project to serve the shopping center and area properties. In the future, when funding is available, the extension would be designed to best accommodate the possibilities available at that time. The high level option over the shopping center is still available and does not obviate the need for the 35-foot option built now. There are operating plans for the system that will continue to rely on the 35-foot station even after an extension is built.*

20) *As described in Section 2.5.10, Project Phasing, and further in Section 8.6.9, Construction Phasing, in the Final EIS, to support phased opening, the first construction phase must be connected to a maintenance and storage facility, which requires considerable space. No location has been identified closer to Downtown with sufficient available space to construct a maintenance and storage facility. Therefore, construction will begin between East Kapolei and Leeward Community College. The Project will be constructed in phases to accomplish the following:*

- *Match the anticipated schedule for right-of-way acquisition and utility relocations.*
- *Reduce the time that each area will experience traffic and community disturbances.*
- *Allow for multiple construction contracts with smaller contract size to promote more competitive bidding.*
- *Match the rate of construction to what can be maintained with local workforce and available financial resources.*
- *Balance expenditure of funds to minimize borrowing.*

The portion of the corridor in the Ewa direction of Pearl Highlands is less developed than the areas in the Koko Head direction. Right-of-way can be obtained more quickly at the west end of the Project; therefore, overall project construction can begin earlier, resulting in lower total construction costs. Construction is planned to continue uninterrupted in the Koko Head direction from Pearl Highlands to Aloha Stadium, Kalihi, and finally to Ala Moana Center.

As portions of the Project are completed, each will be opened incrementally so that system benefits, even if limited during the initial phases, will be realized prior to completion of construction of the entire Project.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

From: Ted.Matley@dot.gov [mailto:Ted.Matley@dot.gov]
Sent: Thursday, February 05, 2009 6:31 AM
To: Miyamoto, Faith
Subject: FW: Rail DEIS comments

From: Matt Lamon [mailto:matt.lamon@gmail.com]
Sent: Thursday, February 05, 2009 1:01 AM
To: wyoshioka@honolulu.gov; Matley, Ted <FTA>; governor.lingle@hawaii.gov
Cc: tapo@honolulu.gov; dmdelacruz@honolulu.gov; bmarshall@honolulu.gov; cdjou@honolulu.gov; dbainum@honolulu.gov; rtam@honolulu.gov; rcachola@honolulu.gov; gokino@honolulu.gov; ngarcia@honolulu.gov
Subject: Rail DEIS comments

Good Day Governor Lingle, Mr. Yoshioka, and Mr. Matley,

The following is my view of the most important shortcoming of the Draft Environmental Impact Statement (DEIS) for the proposed Light Rail in Honolulu.

The environmental impact statement fails to evaluate the *extended* adverse effects on traffic and normal function in Honolulu for the *extended* duration of rail system construction activity.

On page 3-45 of the DEIS the following statement is made in the first paragraph of section 3.5, referring to the timeline for completion of the rail system construction: "These effects would be temporary and would occur between 2009 and 2018...."

The current estimated rail construction duration for the rail system is unrealistic. Several years of

litigation, protest, and technical delays need to be added to the construction duration estimate in order to make it accurate. The H-3 freeway was first proposed in the 1960's and completed well over 30 years later. The H-3 did not require condemnation of nearly as many residences and businesses (if any) as the rail project will. The rail project must anticipate a significant delay due to property rights litigation alone. The H-3 encountered protests, environmental litigation, cultural and archaeological sites, and technical delays, which the rail system construction timeline should also anticipate.

As such, the DEIS should be updated to reflect an *alternative timeline* for the construction of this project. The DEIS should anticipate an *extended period* of traffic delays and other construction related impacts due to construction accidents, failures, emergencies, and negligence, all of which occur normally on Oahu due to poor soil conditions, lack of expertise, inadequate planning and/or execution, and unexpected circumstances. Extensions to deadlines due to such issues during the construction process could add a number of years to the amount of time during which Honolulu will be forced to suffer construction-related impacts.

A realistic timeline is one that anticipates problems leading to an extension of the current construction phase timeline, which the DEIS does not reference with respect to a potentially *extended period* of disruption to the normal function of Honolulu. The DEIS must account for the fact that an *extended* construction period would (and likely will) significantly increase the impact of this project on Honolulu. In fact, the timeliness of the construction of this rail system is likely THE MOST IMPORTANT ISSUE for the majority of Oahu residents at this stage in the project. The fact that the potentially *extended* duration of construction is poorly addressed in the DEIS is indicative of a lack of understanding on behalf of the DEIS authors of the perspective and priorities of Oahu residents, and of the history of mega-projects in Hawaii. Oahu residents do not want to live with rail-construction-related traffic, dust, pollution, risk to life/property, unsightliness, and noise for the next 20-30 years while the rail is being built, repaired, demolished and rebuilt, protested, cordoned off, marched on, re-routed, stayed, and otherwise delayed. Therefore delays need to be anticipated and dealt with as soon as possible. Perhaps this comment will help that process begin.

Hoping for an ahead-of-schedule completion,

Matt Lamon
Honolulu, HI, 96817

2/5/2009

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, 3RD FLOOR
HONOLULU, HAWAII 96813
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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

May 21, 2010

RT9/09-334457

Mr. Matt Lamon
matt.lamon@gmail.com

Dear Mr. Lamon:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address comments regarding the above-referenced submittal:

The construction estimates provided in the Final EIS are related to the length of time required to complete construction of the system. Any other activities not related to construction could cause delays that would pose greater impacts to communities.

Relocations will occur early in the process. Condemnation is a last resort.

Where relocations will occur, compensation will be provided to affected property owners, businesses, or residents in compliance with all applicable Federal and State laws and will follow the Federal Uniform Relocation Assistance and Real Property Acquisition Policies Act. The mitigation measures related to relocations include the following:

- *The City will assist all affected persons in locating suitable replacement housing and business sites within an individual's or businesses' financial means.*

- *A minimum 90-day written notice will be provided before any business or resident will be required to move.*

- *Relocation services will be provided to all affected business and residential property owners and tenants without discrimination; and persons, businesses, or organizations that are displaced as a result of the Project will be treated fairly and equitably.*

Section 3.5 of the Final EIS describes construction-phase effects on transportation during the approximately nine-year construction period. An "alternative timeline" for construction is not part of the Final EIS. The Project's deliverable timeframes and construction schedule are part of the contractor's proposal and become part of the binding construction contract documents. The selection of the construction contractor for the Project will be based on both qualifications and price with the evaluation of qualifications to include the examination of the contractor's prior history of meeting construction schedules for similar projects as well as an examination of recent claims history with regard to project schedules.

The FTA and DTS appreciate your interest in the Project. The Final EIS has been issued in conjunction with the distribution of this letter. You may view the Final EIS on the Project website at www.honolulutransit.org. You may request a DVD of the Final EIS and additional content through the "Contact Us" tab on the website or by calling the Project hotline at 566-2299. Issuance of the Record of Decision under NEPA and acceptance of the Final EIS by the Governor of the State of Hawaii are the next anticipated actions and will conclude the environmental review process for this Project.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

018713

February 2, 2009

RECEIVED
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DIRECTOR'S OFFICE
DEPT OF
TRANSPORTATION SERVICES

Department of Transportation Services
650 South King Street, 3rd Floor
Honolulu, Hawaii 96813

RE: Draft Environmental Impact Statement (DEIS)

Dear Sir or Madam:

As CPA's, we support **viable** and **affordable** traffic solutions for the City and County of Honolulu. We find several flaws regarding funding for the proposed rail project currently estimated to cost $5.5 billion for the airport route adopted on January 28, 2009 and summarized in Section 6 of the Draft Environmental Impact Statement (DEIS). We believe these flaws are of such magnitudes that not only will this project be neither viable nor affordable; this project will jeopardize our City and County's financial health and sustainability.

How realistic are the funding assumptions?

The basis for funding the proposed rail system is a 1/2% excise surcharge assessed on county transactions from January 1, 2007 to December 31, 2021. Using the City's figures provided in Section 6 of the DEIS, this surcharge needs to generate a minimum of $4.1 billion. The cash flow statement of the DEIS includes surcharge tax collections through 2023, two years past the 2021 collection expiration date provided by law. When the taxes for the additional two years are deleted from the City's projection, the required collections are short by $473.5 million (Exhibit A).

The collections from January 2007 to December 2008, total $294 million, substantially below the City's projections. It would require a minimum tax growth rate of 9.46% every year for thirteen (13) years (Exhibit B). Based on the Honolulu's economic history and the current global economy, this growth rate is unattainable.

What do the economists say?

The Council on Revenues (the economic board that provide forecasts of tax revenues to the Governor and State Legislators) issued new tax collection forecasts on January 12, 2009 (Exhibit C.) The forecast for growth in Hawaii tax revenues for 2009 through 2015 are -3.1%, 1%, 3.5%, 5.3%, 6%, 6.5%, and 6.5%. Using these forecasts, it would require an increase, compounded annually; in collections of 25.29% from 2016 to 2021 (Exhibit D). These forecasts do not include the additional cost for borrowing funds due to the shortfall in surcharge tax collections. This rate of required growth in tax collections is unattainable based on our economic history.

The funding should be based on the economic realities and reasonable factors:

1. 2007 and 2008: The actual surcharge collections
2. 2009 through 2015: The Council on Revenues forecasts
3. 2016 through 2021: Using a 6.5% growth rate of collections

Based on the above assumptions, the City will experience a **$1.26 billion shortfall** by the year 2021 (Exhibit E).

How much will the federal government contribute?

The DEIS estimates this rail project will cost approximately $5.5 billion, with $ 1.4 billion to be provided by the U.S. Department of Transportation. The federal funds are to be paid through their "New Starts" grants in the amount $200 million per year for seven [7] consecutive years. The 2009 budget for "new starts" is $1.475 billion for 30 grants that were selected from mass transit program applications from municipalities nationwide. The average grant is $47 million with two-thirds [2/3] of the grants going to cities with populations averaging 5.4 times the size of Honolulu. The average grant for smaller cities such as Honolulu is $23.5 million. There is great competition for these grants. The DEIS assumption that Honolulu will successfully obtain 1/7 of the country's mass transit budget for seven consecutive years is unrealistic and not viable.

What are the risks?

- Honolulu could have a rail system that is never completed. With no monies available to complete the project, the useless concrete pillars will be a monument to an irresponsible act that will mar our landscape for years to come.
- Honolulu's credit rating could plummet resulting in higher unbudgeted costs for interest on borrowed funds.
- Residents could face tax increases to pay for the shortage that will put undue economic pressure on them and future generations.
- Honolulu could be bankrupt due to all the debt that even future generations cannot service.

The City and County of Honolulu has a duty to its residents and taxpayers to act appropriately and prudently when committing our resources to traffic solutions. **The solutions must be viable and affordable.** We await your response to our concerns.

Very truly yours,

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT2/09-298713R

Mr. David Latham
735 Bishop Street, Suite 432
Honolulu, Hawaii 96813

Dear Mr. Latham:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

The Final EIS includes General Excise and Use Tax (GET) surcharge collections through December 31, 2022, in accordance with City Ordinance 05-027 which established the 0.5 percent County surcharge on the GET through this date. As shown in Table 6-4 in the Final EIS, the net GET surcharge revenue will equal $3,524 million (YOE $). The analysis in Chapter 6 of the Final EIS takes the current economic downturn into account.

Section 6.6 of the Final EIS discusses risks and uncertainties associated with the funding assumptions for the Project. A subsection under Section 6.6.3 has been added since the Draft EIS was published to address the Council on Revenues' forecasts. As stated in this section, in the short-term, GET surcharge revenues are subject to uncertainties related to the magnitude and timing of the economic recovery on Oahu. Over the long-term, GET surcharge revenues on Oahu depend on a variety of underlying economic factors outside of the City's control that may result in a higher or lower projection than the one used in this EIS.

While GET surcharge collections have gone down, so too have the costs of the Project. However, if GET surcharge revenues and/or Federal funding are not sufficient to meet the cash-flow requirement to cover capital expenditures, other potential revenue sources will be developed to close the funding gap.

The financial plan is balanced for the entire Project so there will not be a situation in which only a portion of the system will be built. If there is a shortfall, additional revenue sources will be identified. As noted above, Section 6.6 of the Final EIS discusses risks and uncertainties, as well as the potential sources to cover shortfalls.

The magnitude and timing of Federal funding is one source of risk that is discussed in Chapter 6 of the Final EIS. Density and transit use in the corridor are among the highest in the nation and higher than most areas that have qualified for New Starts funding in recent years. This Project has been developed in coordination with FTA since its inception. There is no indication to suggest that the Project will not qualify for the Federal funding requested.

The financial plan was developed in consideration of safeguarding the City's credit rating in light of the likelihood of General Obligation bond sales required to bridge any year-by-year funding shortfalls, with all debt service costs paid with GET surcharge revenues, because FTA Section 5309 will pay for some financing costs. The New Starts funds are also proposed for a significant increase in the latest Federal budget proposal. Further, there has been no indication from the FTA that the requested amount is unreasonable or unrealistic.

As discussed in Section 6.4.2 of the Final EIS, the City's contribution to transit operation and maintenance is currently funded through Federal funding, fare revenues, and the City's General and Highway Funds. This funding will be used to fund operating and maintenance costs of the Project. The General Fund includes property tax revenues and other taxes and fees. Beyond collection of property taxes that fund City operations, for which the City develops rates on an annual basis and part of which will fund transit services, there is no anticipated impact to property taxes. Fixed guideway operation costs will represent between 2 and 3 percent of the City's annual operating budget. Property tax revenues are not expected to be used to fund construction of the Project.

The financial plan is structured to ensure Honolulu will not go bankrupt. The debt amount is a minor part of the Project at less than 10 percent.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

From: robert lantry [mailto:boblantry@yahoo.com]
Sent: Thursday, February 05, 2009 11:28 AM
To: Yoshioka, Wayne
Subject: Just some more same old

What about Linda Lingle and her $4,ooo,ooo,ooo.oo plans for h-1 and h-2. Has she had her study yet our is this just some more talk?

2/9/2009

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT2/09-299050R

Mr. Robert Lantry
boblantry@yahoo.com

Dear Mr. Lantry:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraph addresses your comments regarding the above-referenced submittal:

Comments on the State of Hawaii's transportation plans should be directed to the Hawaii Department of Transportation.

The FTA and DTS appreciate your interest in the Project. The Final EIS has been issued in conjunction with the distribution of this letter. You may view the Final EIS on the Project website at www.honolulutransit.org. You may request a DVD of the Final EIS and additional content through the "Contact Us" tab on the website or by calling the Project hotline at 566-2299. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Status :	Initial Action Needed
Creation Date :	2/6/2009
Creator Affiliation :	
First Name :	Frank
Last Name :	Latino
Business/Organization :	Itochu International Inc.
Address :	188 Rainbow Trail
Alternative Preference :	
Apt./Suite No. :	
City :	Vernon
State :	CT
Zip Code :	06066
Email :	latinofrank@hotmail.com
Telephone :	860 872 3495
Telephone Extension :	
Add to Mailing List :	Both
Submission Method :	Website
Other Submission Method :	
Submission Date :	02/06/2009

Submission Content/Notes : Note, this is a revision to correct a typo on the copy I sent in several hours ago.

February 6, 2009
Subject: Comments on the Draft EIS for HHCTC Project
To:
Mr. Wayne Y. Yoshioka, Director
Department of Transportation Services
650 South King Street, 3rd Floor
Honolulu, Hawaii 96813

and to:

Mr. Ted Matley
Federal Transit Administration, Region IX
201 Mission Street, Suite 1650
San Francisco, CA 94105

These comments to the DEIS are my own informed opinion based on a long association with this project as a consultant for Itochu International Inc. Full disclosure, I am employed by this proponent for the HSST Urban Magnetic Levitation Train. These are my comments and not the comments of Itochu International Inc. or any associated company.

When I first visited Mr. Toru Hamayasu in early 2007 the City plan was to have an open performance specification that would not be for any one technology, and allow technology suppliers and possibly turnkey teams to bid competitive systems. This was an attractive approach and many suppliers, Steel Wheel on Steel Rail, Rubber Tire on Concrete, Monorail and Maglev were interested.

The DEIS includes a short report of the technology selection panel. Before this panel was selected, the Mayor made up his mind that he favored SWSR technology. From that point on, the whole process was arranged and the public "outreach" was co-opted to promote the Mayor's choice.

The candidates and members of the panel were handpicked by the Mayor's management consultants. A requirement was added that the technology had to be limited to one type of fixed guideway technology to insure competitive proposals. This was not necessary if the City allowed different technologies to compete against each other. The panel met only once before a decision was made, and no meaningful discussion was allowed under the pretext of freedom of information and open public information. Instead of scheduling meetings, the panel made quick recommendations, and even before the recommendations were made, the Mayor's consultants were writing the recommendation, and extracting a few bullets from the panel's notes to present to the public. The panel was loaded with Steel Wheel proponents and even with people that had conflicts working for and with SWSR proponents. In our case, the panel did not understand or know the maglev technology being proposed and confused it with other high speed maglev technologies.

The "outreach" program was diverted to support the SWSR selection and more than $2 Million of public money was spent promoting the SWSR decision, even before the City Council deadlocked on approving the technology choice. Instead of resolving this City Council impasse with more information or opening the competition, the Mayor and City pressed on with SWSR to make the scheduled imposed by the Mayor. This "outreach" program continued through the election and public vote on technology.

My major objection to the DEIS is this is supposed to be an environmental impact statement of the transit system. The technology is the most important decision regarding this impact. If the technology is limited to SWSR, as it has in this study document, then the public and taxpayers do not get a proper assessment of alternatives, only the

comparison made against buses and HOV lanes.
This study does not evaluate and study the possible benefits of lower noise, smaller guideway footprint, and lower maintenance cost possible with a system such as our HSST Urban maglev. This can also be said to some extent for a Monorail and for Rubber Tired systems. The City invited suppliers to compete and did not do a proper job in evaluating the environmental impact within this document.
As I write this the City has already solicited bids for the first guideway section for the SWSR system, again without the benefit of a final EIS. It is disappointing that the Oahu residents and taxpayers will not get the best system. The taxpayer will pay more for this system then they would if the technology was open for competition, even if the final decision was SWSR. The public deserves to see a complete environmental comparison.
Sincerely,
Frank Latino
Representative for and Consultant to
Itochu International Inc.
335 Madison Avenue
New York, NY 10017

188 Rainbow Trail
Vernon, CT 06066
860 977 0105 cell
860 872 3495
latinofrank@hotmail.com
www.honolulumaglev.com

DEPARTMENT OF TRANSPORTATION SERVICES

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT10/09-338002

Mr. Frank Latino
188 Rainbow Trail
Vernon, Connecticut 06066

Dear Mr. Latino:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

As noted in Chapter 2 of the Final EIS, the selected transit technology would be electrically powered, industry-standard steel wheel on steel rail powered from a third-rail system. The Draft EIS fully evaluates the selected technology. As stated in Section 2.2.3 of this Final EIS, the NEPA Notice of Intent requested input on five transit technologies. A technical review process included the opportunity for public comment and was used in parallel with the alternatives analysis to select a transit technology. The process included a broad request for information that was publicized to the transit industry. Transit vehicle manufacturers submitted 12 responses covering all of the technologies listed in the Notice of Intent. An independent five-member technology panel composed of four transit experts and a transportation academic appointed by the City Council evaluated guided rubber-tire-on-concrete systems (e.g., Phileas bus system and VAL-type systems), monorail (which is a variation on rubber-tyred technology), steel-wheel-on-steel-rail systems, (e.g., light rail and rapid rail), and magnetic levitation

(MAGLEV) . The panel considered the performance, cost, and reliability of the proposed technologies.

Proprietary technologies, meaning those technologies that would have required all future purchases of vehicles or equipment to be from a single manufacturer, were eliminated because none of the proprietary technologies offered substantial proven performance, cost, and reliability benefits compared to steel wheel operating on steel rail.

The panel accepted public comment twice as part of its review. By a four-to-one vote, the panel chose a steel wheel vehicle operating on steel rail system because it was considered safe, reliable, economical, and non-proprietary. Those results are documented in the panel's report to the City Council dated February 22, 2008 entitled "Independent Technology Selection Panel Report".

The single operating urban magnetic levitation system has a maximum speed of 100 kilometers per hour (62 miles per hour) which is similar to the maximum operating speeds of 50 to 60 miles per hour for steel wheel on steel rail systems. While the system is inherently quieter, other systems may be designed to match the noise level of magnetic levitation when in operation. There is no specific safety improvement from the traction design. The assumed visual benefits for beam-track vehicles would not apply in the U.S. because of requirements to include an emergency egress walkway. Also, the smaller structures proposed in the comment result in shorter span-lengths, which increases the number of columns required and the percentage of view blocked by support structure. There is a single operating urban magnetic levitation system in the world, in Japan, which opened for operation in 2004. No comparative project has ever been built within the U.S. Therefore, no data is available to support a cost estimate. Some of the savings recognized in other countries for beam-track vehicles would not apply in the U.S. because of requirements to include an emergency egress walkway. Also, the smaller structures proposed in the comment result in shorter span-lengths, which increases the number of columns required and the cost to construct both the additional foundations and columns. With no comparative data available to support an operating cost estimate, there is no means to verify this statement. The HSST system operators have declined to make operating expenses available.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
Creation Date :	1/7/2009
Creator Affiliation :	
First Name :	Leauma
Last Name :	Laulu, Jr
Business/Organization :	Good Samaritan Church
Address :	P.O Box 31029
Alternative Preference :	
Apt./Suite No. :	
City :	Honolulu
State :	Hi
Zip Code :	96820
Email :	gsc_hawaii@yahoo.com
Telephone :	808-699-1402
Telephone Extension :	
Add to Mailing List :	Standard
Submission Method :	Website
Other Submission Method :	
Submission Date :	01/07/2009
Submission Content/Notes :	Me and my wife support the Rail transit 100%

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-333007

Mr. Leauma Laulu, Jr.
P.O. Box 31029
Honolulu, Hawaii 96820

Dear Mr. Laulu:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraph addresses your comments regarding the above-referenced submittal:

Your preference for a Fixed Guideway Transit Alternative has been noted. While each of the alternatives discussed in the Draft EIS includes trade-offs between benefits and impacts, the Airport Alternative from East Kapolei to Ala Moana has been selected as the Preferred Alternative as described above. As compared to the alternatives discussed in the Draft EIS, the Airport Alternative will carry the most passengers, provide the greatest transit-user benefits, and result in the fewest vehicle hours of delay. It will provide access to employment centers at Pearl Harbor Naval Base and Honolulu International Airport and will serve the Salt Lake neighborhood with connecting bus service. Of the three Build Alternatives addressed in the Draft EIS, the Airport Alternative will have slightly less impacts to the natural and built environment analyzed in the Draft EIS. During the public comment period on the Draft EIS, the public overwhelmingly supported the Airport Alternative. Of the comments that specifically supported one of the

alternatives, more than 75 percent were in support of the Airport Alternative. For more information this selection is discussed in Section 2.4 of the Final EIS. Since publication of the Draft EIS, design has been advanced, further analysis has been completed, and information has been added in response to comments on the Draft EIS and agency coordination. The Final EIS discusses the process that was used to select the Preferred Alternative, how comments were considered in the decision-making process, impacts and mitigation commitments.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
Creation Date :	11/15/2008
Creator Affiliation :	
First Name :	Andrew
Last Name :	Le
Business/Organization :	808 Geniuses LLC
Address :	1365 Uila Street
Alternative Preference :	
Apt./Suite No. :	
City :	Honolulu
State :	HI
Zip Code :	96818
Email :	808geniuses@gmail.com
Telephone :	808-255-8894
Telephone Extension :	
Add to Mailing List :	Standard
Submission Method :	Website
Other Submission Method :	
Submission Date :	11/15/2008
Submission Content/Notes :	I was just looking at the rail route from the pdfs on this website and just wanted to know if there were going to be any more public presentations for the rail project. Kind of like the neighborhood meetings they have on Olelo (Ch. 49 on basic cable). My main concern was the current issue to change the route from the Salt Lake route to the Pearl Harbor/Airport route, and I just wanted to voice some concern or see what the reasoning is on both sides of the debate. Basically, I'm all for the airport, but why Pearl Harbor? There's a much larger population to address in the Salt Lake area opposed to Pearl Harbor (and the bus ride from Stadium to Pearl Harbor isn't that long) but at the same time , the airport makes sense once the Waikiki extension is completed. And how long until the extensions to Manoa and Waikiki are started on/completed? Thanks, and keep up the graat work guys.

DEPARTMENT OF TRANSPORTATION SERVICES

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-330488

Mr. Andrew Le
1365 Uila Street
Honolulu, Hawaii 96818

Dear Mr. Le:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

While each of the alternatives discussed in the Draft EIS includes trade-offs between benefits and impacts, the Airport Alternative from East Kapolei to Ala Moana has been selected as the Preferred Alternative as described above. As compared to the alternatives discussed in the Draft EIS, the Airport Alternative will carry the most passengers, provide the greatest transit-user benefits, and result in the fewest vehicle hours of delay. It will provide access to employment centers at Pearl Harbor Naval Base and Honolulu International Airport and will serve the Salt Lake neighborhood with connecting bus service. Of the three Build Alternatives addressed in the Draft EIS, the Airport Alternative will have slightly less impacts to the natural and built environment analyzed in the Draft EIS. During the public comment period on the Draft EIS, the public overwhelmingly supported the Airport Alternative. Of the comments that specifically supported one of the alternatives, more than 75 percent were in support of the Airport Alternative. For more information this selection is discussed in Section 2.4 of the Final

EIS. Since publication of the Draft EIS, design has been advanced, further analysis has been completed, and information has been added in response to comments on the Draft EIS and agency coordination. The Final EIS discusses the process that was used to select the Preferred Alternative, how comments were considered in the decision-making process, impacts and mitigation commitments.

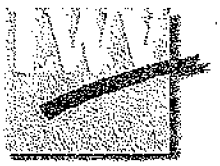
The Project has logical termini at East Kapolei and Ala Moana Center and independent utility from any extensions that may be constructed in the future. The proposed future extensions to West Kapolei, Salt Lake Boulevard, Waikiki, and UH Manoa are discussed in the cumulative impacts sections of Chapters 3 and 4 of this Final EIS. The future extensions are not part of this Project, thus they are not required to be evaluated under Chapter 343 of the Hawaii Revised Statutes and the National Environmental Policy Act (NEPA). Under NEPA, environmental analysis is only required when there is a proposed action by a Federal agency. Here, because the future extensions are not proposed for implementation at this time, they are not part of the Project studied in this Final EIS. It would be premature to undertake an environmental analysis of the extensions (beyond the cumulative impacts analysis) because they are not part of the proposed action to be taken by the City and FTA. If the future extensions are proposed for implementation in the future, environmental analysis of the extensions and appropriate alternatives will be undertaken at that time.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure



THE LEAGUE OF WOMEN VOTERS OF HONOLULU

February 6, 2009

Mr. Wayne Y. Yoshioka
Department of Transportation Services
City and County of Honolulu
650 South King Street, 3rd Floor
Honolulu, HI 96813
808-768-8303
Email: wyoshioka@honolulu.gov

Dear Mr. Yoshioka:

Attached are our comments on the Draft Environmental Impact Statement for the Honolulu High Capacity Transit Corridor Project. We have severe reservations about this project and particularly with the Draft EIS which we feel to be inadequate.

We respectfully request that a Supplemental DEIS be prepared that addresses the issues we raise and those raised by others before the DEIS becomes final. We also request that the Supplement be available as a printed copy for whoever requests it. DVDs are admirable but they are not a substitute for the written word. Too many people do not have computer capabilities and are unjustly excluded from the public participation process. Even those of us who have computers do not necessarily have an office-sized printer that can handle 11 x 17 paper which means we cannot print out the many maps for this project.

Thank you for this opportunity to comment.

Sincerely yours,

Piilani Kaopuiki, President
League of Women Voters of Honolulu

49 South Hotel Street, Room 314, Honolulu, Hawaii 986813 Ph. (808) 531-7448 Fax (808) 599-5669
Website: www.lwv-hawaii.com email: voters@lwv-hawaii.com

Process

The draft EIS for the rail transit project has been made available on the web. It is also provided on a DVD disk. When we asked for a hard paper copy for the League of Women Voters to review, we were told it would cost us $59. When we looked at a copy in the library we could understand why. There are many colored illustrations and foldout maps. But that is exactly the point! These can only be printed on a large office printer that can use 11" x 17" paper. The League doesn't have such a printer and most people don't. Not to mention the burden of the cost of color cartridges for ink jet printers!

This is so ridiculous! Many of our members and the general public are not computer literate – they need something they can hold in their hands and read. Even we who are used to using computers need to print out pages that need close attention.

We think that some of the money that went into producing this beautiful document could have been allocated to a less expensive book that was made widely available to people who want to read it. And considering all the money that has been spent in promoting the rail project, even printing a lot of copies of the expensive version would have not been that outrageous.

If you want the public to participate, you have to make it easy. Otherwise, it is just a shibai. We think the City should stop the whole process and start over again, making a printed copy of the DEIS available to everyone who wants one. It should certainly make printed copies of the Supplement to the DEIS that we request available to anyone who wants one.

Chapter 01: Background, Purpose and Need

The Department of Business, Economic Development and Tourism (DBEDT) 2030 population projection series was used in the DEIS. However, DBEDT issued its 2035 population projection series in January 2008 which is lower than the 2030 series figures for Oahu. The lower figures would have an impact on transit ridership and employment.

The U.S Census Bureau's annual estimates of the population for Oahu from 2000 to 2007 were lower than the DBEDT 2030 population series for that period. Estimates are improvement over projections. The average annual growth rate of the census estimates between 2000 and 2007 was much lower than both the 2030 and 2035 DBEDT annual growth rates for this period. If this continues to 2030, then our population would be lower than 2030 and 2035 population series have projected.

Since early 2008, Honolulu has been in a recession, which has caused a decline in tourism and employment, thus reducing in-migration. The Supplemental DEIS must cover these points.

Chapter 2: Alternatives Considered

The Managed Lane alternative was given insufficient consideration. Cost assigned to this alternative was grossly inflated. Ridership projection was unrealistically low. The improvement to bus service resulting from this alternative was dismissed, resulting in too small a projected benefit.

Why does the train start in Kapolei? The stated reason of starting at the maintenance facility is inadequate. Every other new system was started in the city, where the riders are. Washington, DC, experienced unexpected revenue from midday riders going to lunch. How did other systems cope with the distance from maintenance?

The descriptions of the planned rail stations are inadequate:
How high will the Ala Moana station be?
Will there be restrooms in any of the stations?
In the illustrations, mezzanines (in the text) are called concourses. Or are these 2 different things?

Chapter 4
Environmental Justice Sections 4.6.5 Banana Patch Community and 4.6.6 Mitigation

The DEIS notes that this is a multi-generational community in the area bordering Waipahu and Pearl City. Residents who are primarily of Asian extraction and poor occupy it. It is also the place designated for the Pearl Highland park-and-ride lot that will serve the Pearl Highlands Station. All of the Build Alternatives would displace residences, including single-family homes, businesses and one church.

This section concludes, "Impacts to the Banana Patch community suggest a disproportionate effect on community cohesion and isolation in addition to the relocation effects. The displacement of residences could result in social interaction or sense of community, stability, and psychological unity by removing residents who have resided in the same community for generations. Due to the high cost of living and available land, it is unlikely that residents would be co-located in another area of the city." In other words, the residents so dislocated have no place to go. It will be hard enough to relocate the families individually who will most likely join the ever-increasing ranks of the homeless.

Under 4.6.6 Mitigation it is stated, "The identification of a disproportionately high and adverse effect on EJ populations does not preclude a project from moving forward if a mitigation measure that would avoid or reduce the disproportionately high and adverse effects are not practicable." The document further states that since the project would not result in disproportionately high and adverse impacts within the Oahu metropolitan planning EJ areas, no specific mitigation measures to reduce impacts are warranted. Again, in other words, tough luck. As long as you don't wipe out a really big hunk of low-income areas, you don't have to worry about destroying small areas, no matter how poor or desperate the residents may be.

If we remember correctly, the City's response to the protests against urban renewal in Chinatown with widespread displacement of poor people was, since there was no other affordable place to move them to, the displaced simply had to accept it. Fortunately People Against Chinatown Evacuation (PACE) was formed and wielded enough pressure that the project was abandoned.

It is bad enough that we have a throwaway society as far as material things are concerned. There is no way we can justify throwaway people. If you cannot mitigate bad effects, you don't proceed!

Elsewhere in the document re-alignments are suggested to save historic buildings. But no such measures are considered necessary when it is only poor people that are in the way of the train or a parking lot!

We believe the mitigation measures in this case are totally inadequate. Either the plan should be changed or the residents suitably relocated.

AR00002368

Visual and Aesthetic Conditions, 4.7

The rail transit system will be highly visible and generally unsightly. We note that each station will have one, two, or three platforms, each 300 feet long and a minimum of 12 feet wide. Center platforms will be a minimum of 30 feet wide. These are huge! The most deleterious impacts will be on existing buildings where the train comes close, blocking views, light, and air. The overall impact on the island of Oahu will be such that it is certain to have an adverse impact on tourism, our main economic industry. Who will want to visit a "tropical paradise" that is just as ugly, if not uglier, that the place you live?

The DEIS presents many simulated viewpoint figures that are useful in projecting the visual impacts of the project. However, the last figure in the series Figures 4-17 through 4-36 is of the station near Mother Waldron Park near Halekauwila and Cooke Streets. There is no figure for the station at Ala Moana Center. Please include one in the Supplemental Draft/Final EIS. There are also no descriptions of the planned future stations on the routes to the University of Hawaii and Waikiki. Including these in the Supplemental Draft/Final EIS would be helpful.

The DEIS notes that the Chinatown station will be 30 feet above street level and that other stations in the downtown area will block views from the fourth and fifth story windows. In the Supplemental Draft/Final EIS, please indicate the actual dimensions and the elevation above street level of each station in the text accompanying the figures.

Chapter 06: Cost and Financial Analysis

The declining economy is a major concern that affects this project. The Supplemental DEIS should address the following points:

If the revenue of the general excise and use tax surcharge declines, what steps will the city take to make up the shortfall? Already, citizens are decreasing their spending. How will this affect the capital costs?

If Queen Street replaces Halekauwila Street as part of the transit route, how will this impact transit cost?

Does Federal Transit Administration contingency allocation take into consideration a recession

AR00002369

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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June 11, 2010

RT2/09-299046R

Ms. Piilani Kaopuiki, President
League of Women Voters of Honolulu
49 South Hotel Street, Room 314
Honolulu, Hawaii 96813

Dear Ms. Kaopuiki:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

Process

The Draft EIS was available in hard copy for public review at local libraries and City offices to accommodate those individuals that do not have computer access. It was provided for free on disk, by request, to assist users in searching the document. Due to cost constraints, the number of printed copies was limited. However, bound printed copies were available at cost to anyone who requested one from the City. The use of 11-by-17 inch pages and color in the document allowed maps to be reproduced at a readable resolution and photographs and other figures to convey information about the Project and its impacts. The Final EIS is being widely distributed in an electronic format to maximize public review and to allow the public to understand its contents.

Chapter 1—Background, Purpose and Need

The EIS uses the socio-economic data that was available from OahuMPO at the time that the EIS work began, based on DBEDT's "Population and Economic Projections for the State of Hawaii to 2030" prepared in August 2004. The 2030 forecast year used in the EIS is consistent with FTA's guidance for New Starts projects.

As the comment notes, DBEDT has prepared new forecasts at the County level, "Population and Economic Projections for the State of Hawaii to 2035" issued in January 2008. For use in travel forecasting, these County-level forecasts must be disaggregated to the level of "Travel Analysis Zones" of which there are 764 on Oahu. At the time of the publication of the Draft EIS, these zonal-level forecasts had not been prepared and accepted by OahuMPO.

Your comment notes that the January 2008 DBEDT forecasts have lower population projected than the August 2004 forecasts. Specifically, the January 2008 population forecast for Oahu for 2035 is 3.3 percent lower than the August 2004 forecast. However, the 2035 employment forecast for Oahu from the January 2008 forecasts is 5.8 percent higher than the August 2004 forecast. Thus, it is not clear what the effect on ridership projections would be of using the January 2008 forecast, since the higher employment forecast would likely result in more work trips, which are attractively served by transit, while the lower population forecast would likely result in fewer trips for other purposes.

The financial information contained throughout Chapter 6 of the Final EIS, including in the capital cost analysis in Section 6.3, recognizes the change in economic conditions since the Draft EIS was issued and reflects reduced General Excise and Use Tax (GET) surcharge collections and lower costs of some materials. A statement to that effect is presented in Section 6.1 of the Final EIS. Since economic conditions are continually changing and a snapshot in time will only be valid for that time, the financial plan for the Project is a dynamic document and will be updated periodically to reflect the latest conditions as the Project continues. The plan assumes there will be ups and downs in the economy and is designed as a long-term strategic document that will weather short-term trends. Moreover, the financial plan is reviewed by the FTA under strict guidelines to ensure forecasts of costs and revenues (both capital and operating) are reasonable and that the plan is fiscally viable. Section 6.6 of the Final EIS describes risks and uncertainties associated with the funding assumptions.

Chapter 2—Alternatives Considered

In Chapter 2 of the Alternatives Analysis Report (DTS 2006b), as well as in Chapter 2, of the Final EIS, two options were considered for the Managed Lane Alternative—Two-direction and Reversible. This alternative would have provided a two-lane elevated toll facility between Waipahu and Downtown Honolulu, with variable pricing strategies to maintain free-flow speeds for transit and high-occupancy vehicles (HOVs). The Two-direction Option would have served express buses operating in both directions during the entire day. To maintain free-flow speeds in the Two-direction Option, it might be necessary to charge tolls to manage the number of HOVs using the facility. For the Reversible Option, three-person HOVs would be allowed to use the facility for free, while single-occupant and two-person HOVs would have to pay a toll. The Reversible Option was found to be optimal.

The findings are summarized in Section 2.2.2 of Chapter 2 of the Final EIS as follows: "The Managed Lane Alternative was evaluated for its ability to meet project goals and objectives related to mobility and accessibility, supporting planned growth and economic development, constructability and cost, community and environmental quality, and planning consistency. While this alternative would have slightly reduced congestion on parallel highways, system-wide traffic congestion would have been similar to the No Build Alternative as a result of increased traffic on arterials trying to access the facility. Total islandwide vehicle hours of delay would have increased with the Managed Lane Option compared to the No Build Alternative, indicating an increase in system-wide congestion" (see Table 2-2 of the Final EIS).

The Managed Lane Alternative would not have supported planned concentrated future population and employment growth because it would not provide concentrations of transit service that would serve as a nucleus for transit-oriented development (TOD). The Managed Lane Alternative would have provided little transit benefit at a high cost. The cost-per-hour of transit-user benefits for the Managed Lane Alternative would have been two to three times higher than that for the Fixed Guideway Alternative. Similar to the Transportation System Management (TSM) Alternative, the Managed Lane Alternative would not have substantially improved service or access to transit for transit-dependent communities. No funding sources were identified for the Managed Lane Alternative. Toll revenues from the Managed Lanes Alternative would pay for ongoing operations and maintenance while remaining revenues would be used to repay debt incurred to construct the system.

The Managed Lane Alternative would have generated the greatest amount of air pollution, required the greatest amount of energy for transportation use, and would have resulted in the largest number of transportation noise impacts of all the alternatives evaluated. Because the Managed Lane Alternative would have served a shorter portion of the study corridor (approximately 16 miles compared to the 20 miles served by the fixed guideway), it would have resulted in fewer displacements and would have impacted fewer archaeological, cultural, and historic resources than the Fixed Guideway Alternative. The Managed Lane Alternative would not have affected any farmlands. Visually, the elevated structure would have extended a shorter distance, but it would have been more visually intrusive because its elevated structure, with a typical width of between 36 and 46 feet, would have been much wider than the Fixed Guideway Alternative.

As stated in Table 2-2 in Section 2.2.2 of Chapter 2 of the Final EIS, as well as in Chapter 2 of the Alternative Analysis Report (page 2-16), the total capital costs for the Managed Lane Alternative would range between $3.6 and $4.7 billion, of which $2.6 to $3.8 billion would be for construction of the managed lanes. As stated in the City's Transit Task Force Report, a committee was charged with reviewing cost estimates for the two Alternatives involving construction (Managed Lane Alternative and Fixed Guideway Alternative). The report states that "the Task Force agrees with this committee that the Alternatives Analysis' construction cost estimates were fairly and consistently prepared, and that they may be used for both planning and cost comparisons." Information was obtained by the Task Force from the Hawaii Department of Transportation and others familiar with high-occupancy toll (HOT) facilities. The transit operating costs for the Managed Lane Alternative would range between approximately $251 and $261 million as a result of additional buses that would be put in service under that alternative. These costs do not include the cost of maintaining the managed lane facility.

By contrast, as noted in Table 6-2 of Chapter 6 of the Final EIS, the capital cost of the Fixed Guideway Alternative, including bus system and TheHandiVan costs, would be $6.5 billion in year-of-expenditure dollars. Total operating and maintenance costs for the Fixed Guideway Alternative, including bus, TheHandi-Van and fixed guideway, would be approximately $489 million in year-of-expenditure dollars.

After the Alternatives Analysis phase was completed, several scoping comments were received requesting reconsideration of the Managed Lane Alternative that was considered and rejected during the Alternatives Analysis. Because no new information was provided that would have changed the findings of the Alternatives Analysis regarding the Managed Lane Alternative, it was not included in the Draft EIS for further consideration.

The Fixed Guideway Alternative would be more cost-effective in the long run. As stated in Chapter 6 of the Final EIS, funding sources for the capital investments include a GET surcharge, City general obligation bonds, and FTA funds. Only the Fixed Guideway Alternative could be funded with the GET surcharge. GET is expected to generate $3.5 billion through 2022, and the FTA has agreed to consider at least $1.4 billion as a Federal contribution to the Project under the New Starts program. No funding sources were identified for the Managed Lane Alternative toll revenues from the Managed Lanes Alternative would pay for ongoing operations and maintenance. Any remaining toll revenues would be used to repay debt incurred to construct the system, but other undefined sources of funding would be needed to pay for construction.

As described in Section 2.5.10 in Chapter 2 and further in Section 8.6.9 in Chapter 8 of the Final EIS, to support phased opening, the first construction phase must be connected to a maintenance and storage facility, which requires considerable property. No location has been identified closer to Downtown with sufficient available property to construct a maintenance and storage facility; therefore, construction will begin between East Kapolei and Leeward Community College. The Project will be constructed in phases to accomplish the following:

- *Match the anticipated schedule for right-of-way acquisition and utility relocations.*
- *Reduce the time that each area will experience traffic and community disturbances.*
- *Allow for multiple construction contracts with smaller contract size to promote more competitive bidding.*
- *Match the rate of construction to what can be maintained with local workforce and available financial resources.*
- *Balance expenditure of funds to minimize borrowing.*

The portion of the corridor Ewa of Pearl Highlands is less developed than the areas Koko Head. Therefore, the right-of-way can be obtained more quickly, which will allow the overall project construction to begin sooner, resulting in lower total construction costs. Construction is planned to continue uninterrupted Koko Head from Pearl Highlands to Aloha Stadium, then Kalihi, and finally to Ala Moana Center. Transit systems are typically connected

to a maintenance site at the time they open for operation to allow proper management of rolling stock and systems.

Appendix B of the Final EIS includes detailed project plans and a system profile. The Ala Moana Center Station platform will have an elevation of approximately 35 feet above the existing ground. The stations will have restrooms accessible to the public, but individuals will be required to obtain access to these facilities from the station attendant. In the Draft EIS, the terms mezzanine and concourse were used interchangeably. For the Final EIS, the term concourse is used for ease of reference and to cut down on any potential confusion.

Chapter 4—Environmental Analysis, Consequences, and Mitigation
Environmental Justice Sections 4.7.5 and 4.7.6, Banana Patch Community and Mitigation

Regarding Banana Patch, the Final EIS has been revised to reflect public outreach coordination with this community during the Draft EIS comment period. As discussed in Section 4.7.4, the City has been coordinating with residents of the Banana Patch community since October 2008. Every household has been visited by City staff, right-of-way staff, and engineering staff to discuss the Project, as well as special needs and relocation assistance for residents who will be displaced. Strategic outreach was conducted for this neighborhood, and it was found the residents were mostly interested in learning more about the right-of-way acquisition process. Residents asked when acquisition might occur, how their property would be appraised, and how soon they might receive compensation. Residents of the community did not object to being relocated to decent, safe, and sanitary housing. Because the City has to comply with the Federal Uniform Relocation Assistance and Real Property Acquisition Policies Act, all residents will be relocated to decent, safe, and sanitary housing. No resident of the Banana Patch or resident in any other community within the study area will be left homeless due to the Project.

In addition, no concerns were expressed during Banana Patch outreach meetings about keeping the community intact for relocation purposes. Because the Pearl Highlands Station will displace this community, the location of the station and associated facilities was examined under the USDOT Order on Environmental Justice (Order 5610.2). First, the need for the station was examined. Analysis showed that this station is projected to have the second highest passenger volume of all of the project stations. It will serve as the transfer point for all users in Central Oahu, whether they drive or take TheBus. As such, there is substantial need for the Pearl Highlands Station.

Secondly, two alternatives to the guideway and highway ramp alignments, station locations, and park-and-ride locations for the station were evaluated to access feasibility. One alternative would move the park-and-ride to Leeward Community College. This modification would require a number of changes. The net increase in cost for this alternative would be approximately $90 million. The second alterative considered moving the park-and-ride to the Hawaii Laborers Training program site. This change would prevent the placement of a track switch to access the maintenance and storage facility site near Leeward Community College in the Koko Head direction, which would make this maintenance and storage facility site impractical. The net increase in cost for this alternative would be more than $63 million.

In conclusion, relocating the park-and-ride facilities under either of the two alternatives would provide less efficient transportation access and circulation to the park-and-ride.

Moreover, displaced residents of the Banana Patch community did not voice opposition to the Project, did not express concern about the adverse effects, and appeared satisfied with mitigation measures with regard to relocation. As such, the Project will not result in disproportionately high or adverse impacts to the Banana Patch community.

Where relocations will occur, compensation will be provided to affected property owners in compliance with all applicable Federal and State laws and would follow the Federal Uniform Relocation Assistance and Real Property Acquisition Policies Act (49 CFR 24). The following measures will be implemented for relocations:

- *The City will assist all affected persons in locating suitable replacement housing or businesses within an individual's financial means.*
- *A minimum 90-day written notice will be provided before any business or resident will be required to move.*
- *Relocation services will be provided to all affected businesses and residential property owners and tenants without discrimination; persons, businesses or organizations that are displaced as a result of the Project will be treated fairly and equitably.*

Visual and Aesthetic Conditions Section 4.8

The island's unique visual character and scenic beauty was considered in the visual and aesthetic analysis presented in the Final EIS. The Project will be set in an urban context where visual change is expected and differences in scales of structures are typical. The following measures will be included with the Project to minimize negative visual effects and enhance the visual and aesthetic opportunities that it creates:

- *Develop and apply design guidelines that will establish a consistent design framework for the Project with consideration of local context.*
- *Coordinate the project design with the City's TOD program within the Department of Planning and Permitting.*
- *Consult with the communities surrounding each station for input on station design elements.*
- *Consider specific sites for landscaping and trees during the final design phase when plans for new plantings will be prepared by a landscape architect. Landscape and streetscape improvements will serve to mitigate potential visual impacts.*

It should also be noted that the Project will provide users, including tourists, with expansive views from several portions of the corridor by elevating riders above highway traffic, street trees, and low structures adjacent to the alignment. In Section 4.8.3 of the Final EIS under the heading Design Principals and Mitigation, specific environmental, architecture, and landscape design criteria are listed that will help minimize visual effects of the Project.

As stated in Section 4.8.3 of the Final EIS, "The Ala Moana Center Station will be at the end of the Project. The station and the guideway will be located between the Ala Moana Center and mid- to high-rise buildings and will not substantially change the view from adjacent offices and residences." Additional simulations were conducted for specific views. As there are no protected views planes in the Ala Moana Station area, additional simulations were not developed for this station. Additional simulations were conducted after the Draft EIS and are included in the Final EIS. These include Figures 4-39 through 4-41 and 4-44 through 4-50. Visual simulations of the Project were developed for 19 representative viewpoints that will be affected by the Project to illustrate commonly experienced visual effects. The locations of these viewpoints are shown on Figure 4-16. The simulations (Figures 4-20 through 4-38) depict the guideway and other project elements to illustrate the facilities' sizes and positions but do not include detailed design features. For stations, they show a typical prototype without design detail because station configurations and finishes have yet to be developed, and input will be considered from communities surrounding each station through the Final EIS and design processes.

The Project has logical termini at East Kapolei and Ala Moana Center and independent utility from any extensions that may be constructed in the future. The future extensions to West Kapolei, Salt Lake Boulevard, Waikiki, and UH Manoa are discussed in the cumulative impacts sections of Chapters 3 and 4 of the Final EIS. However, the future extensions are not part of this Project; thus, they are not required to be evaluated under Chapter 343 of the Hawaii Revised Statutes and NEPA. Under NEPA, environmental analysis is only required when there is a proposed action by a Federal agency. Here, because the future extensions are not proposed for implementation at this time, they are not part of the Project studied in the Final EIS. It would be premature to undertake an environmental analysis of the extensions and their relative stations (beyond the cumulative impacts analysis) because they are not part of the proposed action to be taken by the City and FTA. If the extensions are proposed for implementation in the future, environmental analysis of the extensions and their stations and appropriate alternatives will be undertaken at that time.

The actual dimensions of each station will be determined during the final design phase, but they will generally be about 30 feet above the ground unless special conditions prevail. The station's touchdown elements that house stairways, escalators and elevators will vary in size and design, and will be the subject of workshops that are being held with the public. The City is conducting workshops with communities that will have rail stations. The purpose of the workshops is to engage the public about rail stations and provide opportunities to residents and businesses to contribute ideas about the appearance of station entryways in the surrounding areas. Ideas generated at the workshops will be incorporated into the station design process. The simulations included as figures in Section 4.8 of the Final EIS represent the range of scale and spatial relationships of project elements to surrounding land uses and structures, so that the visual effects of the Project can be determined. The visual effects of the Project are documented in this section of the Final EIS.

Chapter 6—Cost and Financial Analysis

The capital plan for the Project is presented in Section 6.3 of the Final EIS, and includes a description of the amount of funding anticipated from various sources. This financial plan and analysis take the current economic downturn into account. Section 6.6 of the Final EIS

describes risks and uncertainties associated with these funding assumptions and how a shortfall in revenue could be handled.

A Queen Street alignment was evaluated at two stages in the Alternatives Analysis process. This alignment had significant visual impacts, impacts on historic properties, impacts on street traffic patterns, and severe engineering constraints and was not brought forward into the Draft EIS. It is not a replacement for Halekauwila Street.

As stated in Chapter 6, page 6-3 of the Alternatives Screening Memorandum, an alignment along Queen Street, rather than Halekauwila Street, had been proposed for screening. Following initial scoping of the alternatives and further engineering analysis, however, it was determined that the Queen Street alignment might not prove to be feasible. As noted in the Alternatives Screening Memo (page 6-3), "The elevated alignment [along Queen Street] would have to pass very near high-rise buildings in some locations. Locating stations within the physical constraints of this alignment is a particular challenge."

Both the Queen Street and the Halekauwila Street alignments were advanced to the Alternatives Analysis. The Queen Street alignment would have direct, significant impacts on a number of historical resources. The Queen Street alignment would also have significant visual impacts on an historic area of Downtown. As noted in the Alternatives Analysis (Pages 6-4 and 6-5), "The Queen Street alignment would have somewhat greater negative visual impact because the narrow available right-of-way would require a stacked alignment in the Downtown area and because it would cross between Hale Auhau and the rest of the Hawaii Capital Historic District. The Nimitz Highway/Halekauwila Street/Kapiolani Boulevard alignment would be the best alignment option within Section V." As a result, the Queen Street alignment did not advance from the Alternatives Analysis to the Draft EIS, and no cost estimate was prepared. Contingency amounts estimated for the capital cost of the Project are intended to account for additional costs that are currently unknown but which are reasonably expected to occur.

In the event of an economic recession, it is likely that construction costs will decline, or at least will not escalate at as high a rate as would be the case in the absence of a recession. Thus, contingency amounts estimated for the Project could be larger than needed. As discussed above, the financial plan is a dynamic document that will be revisited to respond to changing conditions. FTA reviews the estimate regularly using third party specialists and has found the cost estimate to be sound.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
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Submission Method :	Website
Other Submission Method :	
Submission Date :	01/07/2009
Submission Content/Notes :	I support the rail transit

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June 11, 2010

RT9/09-333521

Faanati Leano
P.O. Box 31029
Honolulu, Hawaii 96820

Dear Faanati Leano:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraph addresses your comments regarding the above-referenced submittal:

While each of the alternatives discussed in the Draft EIS includes trade-offs between benefits and impacts, the Airport Alternative from East Kapolei to Ala Moana has been selected as the Preferred Alternative as described above. As compared to the alternatives discussed in the Draft EIS, the Airport Alternative will carry the most passengers, provide the greatest transit-user benefits, and result in the fewest vehicle hours of delay. It will provide access to employment centers at Pearl Harbor Naval Base and Honolulu International Airport and will serve the Salt Lake neighborhood with connecting bus service. Of the three Build Alternatives addressed in the Draft EIS, the Airport Alternative will have slightly less impacts to the natural and built environment analyzed in the Draft EIS. During the public comment period on the Draft EIS, the public overwhelmingly supported the Airport Alternative. Of the comments that specifically supported one of the alternatives, more than 75 percent were in support of the

Airport Alternative. For more information this selection is discussed in Section 2.4 of the Final EIS. Since publication of the Draft EIS, design has been advanced, further analysis has been completed, and information has been added in response to comments on the Draft EIS and agency coordination. The Final EIS discusses the process that was used to select the Preferred Alternative, how comments were considered in the decision-making process, impacts and mitigation commitments.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
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Submission Date :	01/07/2009
Submission Content/Notes :	I support the rail transit

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June 11, 2010

RT9/09-333502

Ms. Fidelia Leano
P.O. Box 31029
Honolulu, Hawaii 96820

Dear Ms. Leano:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

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Your preference for a Fixed Guideway Transit Alternative has been noted. While each of the alternatives discussed in the Draft EIS includes trade-offs between benefits and impacts, the Airport Alternative from East Kapolei to Ala Moana has been selected as the Preferred Alternative as described above. As compared to the alternatives discussed in the Draft EIS, the Airport Alternative will carry the most passengers, provide the greatest transit-user benefits, and result in the fewest vehicle hours of delay. It will provide access to employment centers at Pearl Harbor Naval Base and Honolulu International Airport and will serve the Salt Lake neighborhood with connecting bus service. Of the three Build Alternatives addressed in the Draft EIS, the Airport Alternative will have slightly less impacts to the natural and built environment analyzed in the Draft EIS. During the public comment period on the Draft EIS, the public overwhelmingly supported the Airport Alternative. Of the comments that specifically

supported one of the alternatives, more than 75 percent were in support of the Airport Alternative. For more information this selection is discussed in Section 2.4 of the Final EIS. Since publication of the Draft EIS, design has been advanced, further analysis has been completed, and information has been added in response to comments on the Draft EIS and agency coordination. The Final EIS discusses the process that was used to select the Preferred Alternative, how comments were considered in the decision-making process, impacts and mitigation commitments.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
Record Date :	1/7/2009
First Name :	Nadia
Last Name :	Leano
Business/Organization :	
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Apt./Suite No. :	
City :	Honolulu
State :	HI
Zip Code :	96820
Email :	
Telephone :	
Telephone Extension :	
Add to Mailing List :	Standard
Submission Method :	Website
Submission Content/Notes :	Lets start building now

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-333497

Ms. Nadia Leano
P.O. Box 31029
Honolulu, Hawaii 96820

Dear Ms. Leano:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

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supported one of the alternatives, more than 75 percent were in support of the Airport Alternative. For more information this selection is discussed in Section 2.4 of the Final EIS. Since publication of the Draft EIS, design has been advanced, further analysis has been completed, and information has been added in response to comments on the Draft EIS and agency coordination. The Final EIS discusses the process that was used to select the Preferred Alternative, how comments were considered in the decision-making process, impacts and mitigation commitments.

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Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
Creation Date :	1/7/2009
Creator Affiliation :	
First Name :	Taulagi
Last Name :	Leano
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Zip Code :	96820
Email :	
Telephone :	
Telephone Extension :	
Add to Mailing List :	Standard
Submission Method :	Website
Other Submission Method :	
Submission Date :	01/07/2009
Submission Content/Notes :	This is a great help for us to have the rail transit

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SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-333493

Taulagi Leano
P.O. Box 31029
Honolulu, Hawaii 96820

Dear Taulagi Leano:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

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Your preference for a Fixed Guideway Transit Alternative has been noted. While each of the alternatives discussed in the Draft EIS includes trade-offs between benefits and impacts, the Airport Alternative from East Kapolei to Ala Moana has been selected as the Preferred Alternative as described above. As compared to the alternatives discussed in the Draft EIS, the Airport Alternative will carry the most passengers, provide the greatest transit-user benefits, and result in the fewest vehicle hours of delay. It will provide access to employment centers at Pearl Harbor Naval Base and Honolulu International Airport and will serve the Salt Lake neighborhood with connecting bus service. Of the three Build Alternatives addressed in the Draft EIS, the Airport Alternative will have slightly less impacts to the natural and built environment analyzed in the Draft EIS. During the public comment period on the Draft EIS, the public overwhelmingly supported the Airport Alternative. Of the comments that specifically

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DEPUTY DIRECTOR

KENNETH TORU HAMAYASU
DEPUTY DIRECTOR

June 11, 2010

RT10/09-338277

Mr. Henry Curtis, Executive Director
Life of the Land
76 North King Street, Suite 203
Honolulu, Hawaii 96817

Dear Mr. Curtis:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS should focus on the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

Life of the Land Comment 1

As stated in Section 2.2 of the Final EIS, prior to selecting an elevated fixed guideway system, a variety of high-capacity transit options were evaluated during the Primary Corridor Transportation Project (1998—2002) and Alternatives Analysis. Options evaluated and rejected included an exclusively at-grade fixed guideway system using light-rail or bus rapid transit (BRT) vehicles, as well as a mix of options consisting of both at-grade and grade-separated segments.

The Alternatives Screening Memorandum (DTS 2006a) recognized the visually sensitive areas in Kakaako and Downtown Honolulu, including the Chinatown, Hawaii Capital, and Thomas Square/Honolulu Academy of Arts Special District. To minimize impacts on historic resources, visual aesthetics, and surface traffic, the screening process considered 15

combinations of tunnel, at-grade, or elevated alignments between Iwilei and Ward Avenue. Five different alignments through Downtown Honolulu were advanced for further analysis in the Alternatives Analysis, including an at-grade portion along Hotel Street, a tunnel under King Street, and elevated guideways along Nimitz Highway and Queen Street (Figure 2-4).

The Alternatives Analysis Report (DTS 2006b) evaluated the alignment alternatives based on transportation and overall benefits, environmental and social impacts, and cost considerations. The report found that an at-grade alignment along Hotel Street would require the acquisition of more parcels and could potentially affect more burial sites than any of the other alternatives considered. The alignment with at-grade operation Downtown and a tunnel under King Street, was not selected because of the environmental effects, such as impacts to cultural resources, reduction of street capacity, and property acquisition requirements of the at-grade and tunnel sections, which would cost an additional $300 million.

The Project's purpose is "to provide high-capacity rapid transit" in the congested east-west travel corridor (see Section 1.7 of the Final EIS). The need for the Project includes improving corridor transit mobility and reliability. The at-grade alignment would not meet the Project's Purpose and Need because it could not satisfy the mobility and reliability objectives of the Project (see bullets below). Some of the technical considerations associated with an at-grade versus elevated alignment through Downtown Honolulu include the following:

- ***System Capacity, Speed, and Reliability**—The short, 200-foot (or less) blocks in Downtown Honolulu would permanently limit the system to two-car trains to prevent stopped trains from blocking vehicular traffic on cross-streets. Under ideal operational circumstances, the capacity of an at-grade system could reach 4,000 passengers per hour per direction, assuming optimistic five minute headways. Based on travel forecasts, the Project should support approximately 8,000 passengers in the peak hour by 2030. Moreover, the Project can be readily expanded to carry over 25,000 in each direction by reducing the interval between trains (headway) to 90 seconds during the peak period. To reach a comparable system capacity, speed, and reliability, an at-grade alignment would require a fenced, segregated right-of-way that would eliminate all obstacles to the train's passage, such as vehicular, pedestrian, or bicycle crossings. Even with transit signal priority, the at-grade speeds would be slower and less reliable than an elevated guideway. An at-grade system would travel at slower speeds due to the shorter blocks, tight and short radius curves in places within the constrained and congested Downtown street network, the need to obey traffic regulations (e.g., traffic signals), and potential conflicts with other at-grade activity, including cars, bicyclists, and pedestrians. These effects mean longer travel times and far less reliability than a fully grade-separated system. None of these factors affects an elevated rail system. The elevated rail can travel at its own speed any time of the day regardless of weather, traffic, or the need to let cross traffic proceed at intersections.*

- ***Mixed-Traffic Conflicts**—The Project will run at three minute headways. However, three-minute headways with an at-grade system would prevent effective coordination of traffic signals in the delicately balanced signal network in downtown Honolulu. A disruption of traffic signal cycle coordination every three minutes would severely affect traffic flow and capacity of cross-streets.*

Furthermore, there would be no option to increase the capacity of the at-grade rail system by reducing the headway to 90 seconds, which would only exacerbate the signalization problem. An at-grade system would require removal of two or more existing traffic lanes on affected streets. This effect is significant and would exacerbate congestion. Congestion would not be isolated to the streets that cross the at-grade alignment but, instead, would spread throughout Downtown. The Final EIS shows that the Project's impact on traffic will be isolated and minimal with the elevated rail, and, in fact will reduce system-wide traffic delay by 18 percent compared to the No Build Alternative (Table 3-14 in the Final EIS). The elevated guideway will require no removal of existing through travel lanes, while providing a reliable travel alternative. When traffic slows, or even stops due to congestion or incidents, the elevated rail transit will continue to operate without delay or interruption.

An at-grade light rail system with continuous tracks in-street would create major impediments to turning movements, many of which would have to be closed to eliminate a crash hazard. Even where turning movements are designed to be accommodated, at-grade systems experience potential collision problems. In addition, mixing at-grade fixed guideway vehicles with cars, bicyclists, and pedestrians presents a much higher potential for conflicts compared to grade-separated conditions. Where pedestrian and automobiles cross the tracks in the street network, particularly in areas of high activity (e.g., station areas or intersections), there is a risk of collisions involving trains that does not exist with an elevated system. There is evidence of crashes between trains and cars and trains and pedestrians on other at-grade systems throughout the country (e.g., Phoenix, Houston, LA). This potential would be high in the Chinatown and Downtown neighborhoods, where the number of pedestrians is high and the aging population presents a particular risk.

- ***Construction Impacts***—*Constructing an at-grade rail system could have more effects than an elevated system in a number of ways. The wider and continuous footprint of an at-grade rail system compared to an elevated rail system (which touches the ground only at discrete column foundations, power substations, and station accessways) increases the potential of utility conflicts and impacts to sensitive cultural resources. In addition, the extra roadway lanes utilized by an at-grade system would result in increased congestion or require that additional businesses or homes be taken to widen the roadway through Downtown. Additionally, the duration of short-term construction impacts to the community and environment with an at-grade system would be considerably greater than with an elevated system. Because of differing construction techniques, more lanes would need to be continuously closed for at-grade construction and the closures would last longer than with elevated construction. This would result in a greater disruption to business and residential access, prolonged exposure to construction noise, and traffic impacts.*

Because it is not feasible for an at-grade system through Downtown to move passengers rapidly and reliably without significant detrimental effects on other transportation system elements (e.g., the highway and pedestrian systems, safety, reliability, etc.), an at-grade system would have a negative system-wide impact that would reduce ridership throughout the system.

The at-grade system would not meet the Project's Purpose and Need and, therefore, does not require further analysis.

As stated previously, the short 200-foot (or less) blocks in Downtown Honolulu would permanently limit the system to two-car trains to prevent stopped trains from blocking vehicular traffic on cross-streets. Even with transit signal priority, the at-grade speeds will be slower and less reliable than an elevated guideway. Under ideal circumstances, the capacity of an at-grade system could reach 4,000 passengers per hour per direction, assuming optimistic five minute headways. Based on travel forecasts, the Project should support approximately 8,000 passengers in the peak hour by 2030. Moreover, the Project can be readily expanded to carry over 25,000 in each direction by reducing the interval between trains (headway) to 90 seconds during the peak period. To reach a comparable system capacity, speed and reliability, an at-grade alignment would require a fenced, segregated right-of-way that would eliminate all obstacles to the train's passage, such as vehicular, pedestrian or bicycle crossings.

Life of the Land Comment 2

As discussed in the response to Comment 1 in this letter, 15 combinations of tunnel, at-grade, or elevated alignments between Iwilei and Ward Avenue were considered during the screening process. Five different alignments through Downtown were advanced for further analysis in the Alternatives Analysis, including an at-grade portion along Hotel Street and a tunnel under King Street. The Alternatives Analysis Report (2006) and the Alternatives Screening Memorandum (2006) provide a discussion regarding the at-grade alignments considered. The reference sections of these reports list other resources that support the alternatives analysis.

Life of the Land Comment 3

Enhanced bus service was considered during the Alternatives Analysis Phase (referred to as the Transportation System Management (TSM) Alternative). As discussed in Chapter 2, Section 2.2.2 of the Final EIS, the TSM Alternative was designed to serve the study corridor based on a hub-and-spoke network of bus routes, similar to today. The alternative included express bus service that operated as bus rapid transit in existing facilities. Bus frequencies would have been increased during peak periods to provide improved service for work-related trips, particularly from developing areas such as Royal Kunia, Koa Ridge, and Waiawa. The bus fleet was assumed to increase from 525 to 765 buses, and park-and-ride lots were assumed at West Kapolei, UH West Oahu, Waipio, and Aloha Stadium. In addition, the present a.m. peak-hour-only zipper lane would have been modified to operate in both the a.m. and p.m. peak periods, and relatively low-cost improvements would have been made on selected roadways to give priority to buses.

The analyses found that the TSM Alternative would have improved transit travel times somewhat by reducing the amount of time riders would have to wait for a bus to arrive at a bus stop. As a result, the TSM Alternative would have led to a slightly larger number of daily transit trips than the No Build Alternative (Table 2-2). This alternative would have generated fewer hours of transit-user benefits than either the Managed Lane or Fixed Guideway Alternative. Since most buses would still operate in mixed traffic, the TSM Alternative would have done little to improve corridor mobility and travel reliability. Roadway congestion also would not have been alleviated. In addition, because of the dispersed nature of transit service, slow bus

speeds, and unreliable service, the TSM Alternative would not have supported the City's goals of concentrating growth within the corridor and reducing development pressures in rural areas.

In terms of its environmental impacts, the TSM Alternative would have generated fewer physical impacts than the Managed Lane and Fixed Guideway Alternatives. However, it would have required more transportation system energy and generated more air pollutant emissions and water pollution than the Fixed Guideway Alternative (Table 2-3). Although the TSM Alternative would have been very cost-effective, financial feasibility was a concern. Currently, State legislation does not allow the local excise and use tax surcharge to be used for enhancement of the existing bus transit system.

Life of the Land Comment 4

The Alternatives Analysis Report (2006) and the Alternatives Screening Memorandum (2006) provide a discussion on the TSM Alternative, including results of the analysis. The reference sections of these reports list other resources that support the alternatives analysis, including analysis of the TSM Alternative.

Life of the Land Comment 5

As discussed in the response to Comment 1 in this letter, 15 combinations of tunnel, at-grade, or elevated alignments between Iwilei and Ward Avenue were considered during the screening process. Five different alignments through Downtown were advanced for further analysis in the Alternatives Analysis, including an at-grade portion along Hotel Street and a tunnel under King Street. The Alternatives Analysis Report (2006) and the Alternatives Screening Memorandum (2006) provide a discussion regarding the at-grade alignments considered. The reference sections of these reports list other resources that support the alternatives analysis.

Life of the Land Comment 6

The Project's technology, which is steel wheel on steel rail, may be operated above grade (elevated), at-grade (street level), or below grade (underground). The requirement is that the system operates in an exclusive right-of-way. To preserve system speed and reliability, neither automobiles nor pedestrians can be allowed to cross the tracks. For at-grade operation, this would require a fenced right-of-way with no crossings. It is not possible to construct such a system in developed portions of the corridor such as in the Downtown area. Portions of the alignment in undeveloped areas could be constructed at-grade with a fenced right-of-way. However, this would prohibit at-grade access to the future development. Placing any part of the system in mixed right-of-way would affect reliability of the entire system as described above.

Life of the Land Comment 7

See response to Life of the Land Comment 6. Regarding costs, an at-grade system is less costly, but the compromise in performance would make it infeasible in Honolulu. A good comparison is Phoenix, which recently opened a fully at-grade system that is 20 miles long, similar in length to this Project. It takes over 1-½ hours to travel from end-to-end compared to the 42 minutes it will take in Honolulu. Phoenix has also had some vehicular and pedestrian safety challenges as people negotiate the streets with the new system. In Phoenix, the at-grade system works because it has plenty of alternative street options for vehicular traffic to use. That flexibility does not exist in Honolulu.

Life of the Land Comment 8

To meet system requirements as outlined in Section 2.5.1 of the Final EIS, at-grade operation would require a fenced right-of-way. Cross-streets and local access would preclude at-grade operation adjacent to Farrington Highway. As discussed above, an at-grade system was found not to be feasible therefore an investigation of right-of-way on specific streets for an at-grade system was not conducted.

Life of the Land Comment 9

The Project follows Farrington Highway, not H-1 in the Kapolei-Ewa area. During the Alternatives Analysis process, the Hawaii State Department of Transportation (HDOT) informed DTS that all of the H-1 right-of-way needs to be preserved for future freeway use.

Life of the Land Comment 10

Farrington Highway lanes could not be used for a rail line. One of the project design requirements is operation in an exclusive right-of-way. Using lanes on Nimitz Highway would create pedestrian-vehicle conflicts. In addition, reducing the number of travel lanes would worsen congestion for highway users.

Life of the Land Comment 11

At-grade operation would require a fenced right-of-way. Cross-streets and local access along Farrington Highway would preclude at-grade operation in Waipahu.

Life of the Land Comment 12

The Project alignment goes directly through the mauka portion of the Leeward Community College (LCC) campus and includes a station at LCC. A spur was not considered. The alignment follows this route because it serves the LCC campus and other nearby activity centers and provides access to the preferred maintenance and storage facility, which is located adjacent to LCC. Details about the alignment selection can be found in the Alternatives Analysis Report (2006).

Life of the Land Comment 13

The fixed guideway Project will serve LCC. Figure 3-9 in this Final EIS shows 190 passenger boardings and 700 alightings at this station during the a.m. two hour peak period (6 a.m. to 8 a.m.). Figure 3-10 shows 3,200 daily boardings and alightings.

Life of the Land Comment 14

The Project will serve Central Oahu with feeder bus service. A future rail extension to this area is not precluded. Future bus routes and frequencies are shown in Appendix D in the Final EIS.

Life of the Land Comment 15

The Waipio area will be served by the fixed guideway station in Waipahu with buses serving the surrounding communities. Figure 3-9 in the Final EIS shows 1,050 passenger boardings and 350 alightings at this station during the a.m. two hour peak period. Figure 3-10 shows 3,080 daily boardings and alightings. A spur line to Waipio has not been evaluated.

Life of the Land Comment 16

The Project does not serve Mililani directly via the fixed guideway system. However, the Project does include a major transit center and park-and-ride facility at the H-1/H-2 merge (Figure 2-21 in this Final EIS) that will be accessible via a direct off-ramp from H-2. Figure 3-7 in this Final EIS shows that travel times will be reduced for those traveling from Mililani to Downtown using the fixed guideway system for a portion of their commute. A spur line to Mililani has not been evaluated.

Life of the Land Comment 17

The Kamehameha Highway right-of-way abuts private property and construction of even one rail track on the makai side of this road would require acquiring right-of-way near Pearl Highlands Center, Pearl City Shopping Center, and the Pearl Ridge Shopping Center. These locations will be instead served by an elevated guideway system, which minimizes the amount of right-of-way needed in this area.

Life of the Land Comment 18

The Kamehameha Highway right-of-way abuts private property and construction of even one rail track on the mauka side of this road would require acquiring right-of-way near Pearl Highlands Center, Pearl City Shopping Center, and the Pearl Ridge Shopping Center. These locations will instead be served by an elevated guideway system, which minimizes the amount of right-of-way needed in this area.

Life of the Land Comment 19

There is sufficient space for an elevated guideway makai of the Airport Viaduct. Ewa of Aolele, the Project is makai of the H-1 and Nimitz Highway interchange. Koko Head of Aolele, it

would be difficult to cross over the airport access ramps, and fewer riders would be served than with the proposed alignment serving the Airport along Aolele and Ualena Streets.

Life of the Land Comment 20

All land on both sides of Kamehameha Highway near the Pearl Harbor Naval Base is controlled by the Federal government, and much of it contains historic resources. There is insufficient land makai of Kamehameha Highway for a rail line and/or station at-grade. The Pearl Harbor Naval Base station will touch down on the mauka side of Kamehameha Highway at Radford Drive to avoid the historic resources on the makai side.

Life of the Land Comment 21

Pearl Harbor Naval Base will be served by the Project with a station at Kamehameha Highway and Radford Drive. Figure 3-9 in this Final EIS shows 550 passenger boardings and 1,410 alightings at the Pearl Harbor Naval Base Station during the a.m. two hour peak period. Figure 3-10 shows 5,440 daily boardings and alightings. There will be bus service connecting the rail station with destinations on Pearl Harbor Naval Base.

Life of the Land Comment 22

There will be a fixed guideway station serving Pearl Harbor Naval Base. Figure 3-9 in this Final EIS shows 550 passenger boardings and 1,410 alightings at this station during the a.m. two hour peak period. Figure 3-10 shows 5,440 daily boardings and alightings.

Life of the Land Comment 23

The Project will serve the Hickam Air Force Base with feeder bus service. The routes are shown in Appendix D in the Final EIS. This service is included in the ridership forecasting presented in the Draft and Final EISs. The service on-base is not available to the general public. Due to the feeder bus system, a spur was not included in the Project.

Life of the Land Comment 24

A spur line to Hickam Air Force Base is not part of the Project. Hickam Air Force Base will be served by the Pearl Harbor Naval Base fixed guideway station with feeder buses running between the fixed guideway station at the Naval Base and the Air Force Base. Figure 3-9 in this Final EIS shows 550 passenger boardings and 1,410 alightings at this station during the a.m. two hour peak period. Figure 3-10 shows 5,440 daily boardings and alightings. Due to the feeder bus system, a spur was not included in the Project.

Life of the Land Comment 25

As discussed in Chapter 3, Section 3.4.6, and in Appendix B to the Final EIS, the rail line will provide access to Honolulu International Airport. There will be a rail station on Airport property near the overseas parking garage just Ewa of the parking garage exist lanes, fronting Ala Onaona Street. The station will be about 600 to 800 feet from the interisland and overseas terminal and ground level pedestrian walkways will connect the station to the terminals.

Figure 3-10 in this Final EIS shows daily boardings at the Honolulu International Airport Station (3,260 boardings and 3,060 alightings).

The line will not displace roadways or vehicles from the Airport; hence, security will not be affected by displacement of vehicle access. As the rail line will not affect roadway access or operations, it will not cause congestion or idling of vehicles.

Life of the Land Comment 26

The Project provides a direct connection between Ewa and Honolulu via the Honolulu International Airport. Therefore, the addition of a loop at the Airport is not necessary.

Life of the Land Comment 27

The Project connects between Ewa and Honolulu via the Honolulu International Airport with stations located at Aloha Stadium, Pearl Harbor Naval Base, and Honolulu International Airport. As a result, the loop as described in your comment is not necessary.

Life of the Land Comment 28

The fixed guideway system will serve Honolulu International Airport with a station directly located on airport property, as described in response to Comment 25 (above). Figure 3-9 in this Final EIS shows 380 passenger boardings and 1,330 alightings at this station during the a.m. two hour peak period. Figure 3-10 shows 3,260 boardings and 3,060 alightings at this station.

Life of the Land Comment 29

The Purpose and Need of this Project is discussed in Section 1.7 and 1.8 of the Final EIS. Any questions about Airport plans to provide shuttle service around the airport should be directed to the Hawaii State Department of Transportation Airports Division.

An alignment mauka of the Airport Viaduct was evaluated in the Alternatives Analysis. There is sufficient space for an elevated guideway; however, transfer of riders to the Honolulu International Airport is difficult and the ridership projections for the alignment are the lowest figures of the evaluated alignments.

Life of the Land Comment 30

According to Table 2-8 in this Final EIS, there will be 600 spaces at the Aloha Stadium Park-and-Ride facility. The travel demand forecasting model estimated projected demand at guideway stations and these estimates are for year 2030 (Table 3-22 in the Final EIS). Design for all Project stations is currently in the preliminary design stage. All coordination letters can be found in Appendix F of the Final EIS.

Life of the Land Comment 31

At-grade operation would require a fenced right-of-way throughout the alignment. Cross-streets and local access would preclude at-grade operation adjacent to Nimitz Highway in

the Iwilei area. Please see response to Comment 1 for a discussion of the effects of an at-grade system.

Life of the Land Comment 32

Using lanes on Nimitz Highway for a rail line would not be feasible as this would create potential conflicts between the train and pedestrians and other vehicles. In addition, reducing the number of travel lanes on Nimitz Highway would worsen traffic congestion.

Life of the Land Comment 33

A future rail line and park and ride could be constructed to Sand Island but it is not part of this Project. However, the Project does not include a rail line to Sand Island or a park-and-ride in this area. The Project travels along Dillingham Boulevard and transitions to Nimitz Highway at Kekaulike Street, which is Koko Head of Sand Island.

Life of the Land Comment 34

A below ground route on Nimitz Highway was never evaluated. Since Nimitz Highway runs along the water front, a below ground route would be below the water line, which would add significant cost to construction. Table 5-2 in the Alternatives Analysis Report shows the cost of a below ground route through Chinatown along King Street would cost $1,900 million in 2006 dollars (the year the alternative was evaluated) for just that segment between Iwilei and UH Manoa. This was the most expensive alignment evaluated between Iwilei and UH Manoa. The ideal above ground alignment studied in this area was estimated to cost $1,230 million in 2006 dollars.

Life of the Land Comment 35

An alignment along Ala Moana Boulevard was considered during early alternative screening and eliminated because of view and parkland impacts.

Life of the Land Comment 36

An alignment along Ala Wai Boulevard is discussed in the Alternatives Screening Memo. This report states that the aesthetic impact of an aerial structure along Ala Wai Boulevard and the Ala Wai Canal would be severe. As a result, it was not considered further as part of the Alternatives Analysis phase.

Life of the Land Comment 37

The Screening Memo discusses the elevated routes that were examined between Ala Moana Center and UH Manoa. At-grade routes to UH Manoa were not considered due to the impact to existing travel lanes and potential conflicts with pedestrians, bicyclists and drivers. This area of the corridor is very congested and an at-grade alignment would have required removal of traffic lanes, which would have resulted in increases in traffic congestion.

The Project will serve the UH Manoa campus with feeder bus service transferring at Ala Moana Center. The routes are shown in Appendix D in this Final EIS. This service is included

in the ridership forecasting presented in the Section 3.4.2 of the Draft and Final EISs. Additionally, Table 3-29 in this Final EIS shows that the potential rail extensions to West Kapolei, Salt Lake Boulevard, Waikiki, and UH Manoa would increase fixed guideway ridership by approximately 25 percent in addition to 116,000 ridership estimated for the Project.

Life of the Land Comments 38 and 39

City Council Resolution 08-261 identified the Airport Alternative from East Kapolei to Ala Moana Center as the preferred alternative. Table 3-29 in this Final EIS shows that the potential extensions to West Kapolei, Salt Lake Boulevard, Waikiki, and UH Manoa would increase fixed guideway ridership by approximately 25 percent in addition to 116,000 ridership estimated for the Project. Enhanced bus service from Ala Moana Center to Waikiki will be provided until the fixed guideway extensions are implemented. Projected transit ridership with the future extensions (West Kapolei, Salt Lake Boulevard, UH Manoa, and Waikiki) are provided in Table 3-29 of the Final EIS.

Life of the Land Comment 40

The fixed guideway Project will provide greater transportation options. Currently, people on Oahu can travel by private automobile, TheBus, bicycle, or walking. The fixed guideway Project will add another option. Since the fixed guideway vehicles will be completely separated from roadway traffic operations, the Project will provide higher transit service reliability compared to the No Build Alternative.

Life of the Land Comment 41

After completion of construction, the Project will not decrease or increase regional population or the number of jobs; however, it will influence the distribution, rate, density, and intensity of development in the study corridor. Without the Project, growth is more likely to be dispersed outside of the study corridor, including in undeveloped areas of Central and North Oahu.

Life of the Land Comment 42

As described in Section 2.5.10 and further in Section 8.6.9 in the Final EIS, to support phased opening, the first construction phase must be connected to a maintenance and storage facility, which requires considerable space. No location has been identified closer to Downtown with sufficient available space to construct a maintenance and storage facility. Therefore, construction will begin between East Kapolei and Leeward Community College. The Project will be constructed in phases to accomplish the following:

- *Match the anticipated schedule for right-of-way acquisition and utility relocations.*
- *Reduce the time that each area will experience traffic and community disturbances.*
- *Allow for multiple construction contracts with smaller contract size to promote more competitive bidding.*

- *Match the rate of construction to what can be maintained with local workforce and available financial resources.*

- *Balance expenditure of funds to minimize borrowing.*

The portion of the corridor in the Ewa direction of Pearl Highlands is less developed than the areas in the Koko Head direction. Right-of-way can be obtained more quickly at the west end of the Project; therefore, overall project construction can begin earlier, resulting in lower total construction costs. Construction is planned to continue uninterrupted in the Koko Head direction from Pearl Highlands to Aloha Stadium, Kalihi, and finally to Ala Moana Center.

As portions of the Project are completed, each will be opened incrementally so that system benefits, even if limited during the initial phases, will be realized prior to completion of construction of the entire Project.

Ridership numbers would be higher if construction started on the Koko Head end of the line, however, the lack of available space for a maintenance and storage facility on that end of the corridor makes such phasing unfeasible. Figure 3-9 and Figure 3-10 in this Final EIS show ridership on the Project. These figures show peak period and daily ridership totals traveling Koko Head-bound and Ewa-bound once the entire Project is in operation.

Life of the Land Comment 43

The Project is focused exclusively on the construction and implementation of rail transit service, which is analyzed in the EIS. However, as mentioned in Section 4.19.2 in this Final EIS, transit-oriented development (TOD) would be expected to occur in Project station areas as an indirect effect of the Project.

The increased mobility and accessibility the Project will provide would increase the desirability and value of land near the stations, thereby attracting new real estate investment nearby (in the form of TOD). Planning and zoning around station areas will be established and conducted by the City's Department of Planning and Permitting under a process covered by the City's new TOD Ordinance 09-4.

Life of the Land Comment 44

As discussed in Section 4.19.2 in this Final EIS, after completion of construction, the Project will not decrease or increase regional population or the number of jobs; however, it will influence the distribution of development.

Life of the Land Comment 45

The Project will not change any zoning or other development rights. Questions pertaining to development rights should be directed to the City's Department of Planning and Permitting.

Any changes to zoning or other development rights near the stations will be determined by the City Council.

Life of the Land Comment 46

According to Section 4.19.2 in this Final EIS, experience in other cities indicates that property sales values increase by $60 to $2,300 for every 100 feet closer to a transit station (see Table 4-38 in this Final EIS). The effect cannot be isolated from other market forces; therefore, the precise effect of the transit system cannot be determined.

Life of the Land Comment 47

Elevated transit systems that serve various Chinatowns have been built in Chicago, Boston, Los Angeles, Manila and Singapore.

Life of the Land Comment 48

Each of the cities listed in Life of the Land Comment 47 is unique and the introduction of transit has affected each differently. Generally, Chinatowns are located in relatively dense urban areas near downtown and therefore have benefited from access to transit.

Life of the Land Comment 49

Section 4.8.3 in this Final EIS discusses shade and shadow effects of the system.

According to the Federal Transit Administration's Safety Management Information Statistics for 1997, the most recent data available in the Transportation Research Board (TRB) Report "Improving Transit Security," there was one serious offense for every one million passenger miles carried on rail. There is a need for security on transit systems, just as there is a need for police and other security in all aspects of modern society, but there is no evidence that crime rates associated with transit are any higher than for society in general. Crime rates on transit systems are correlated closely with crime rates in the neighborhoods within which the stations are located (e.g., "Crime in public transit systems: An environmental design perspective", Adele Pearlstein and Martin Wachs).

Life of the Land Comment 50

The majority of the system will be located in roadway medians. It will not be enclosed in barbed wire.

Life of the Land Comment 51

Several fixed guideway stations will be located at or near existing or planned bicycle facilities. Many bicycle lanes (planned by the City or State) could connect to fixed guideway stations. Each station will have facilities for parking bicycles, and each guideway vehicle will be designed to accommodate bicycles, as regulated by a bicycle policy to be developed by the City. Locations where potential effects on bicycle facilities could occur are shown in Table 3-25 in this Final EIS.

Life of the Land Comments 52

Public involvement (e.g., conducting public meetings, providing project information, and requesting public comments,) is an integral and essential part of the project planning process. Guidelines set forth by NEPA, and Chapter 343 of the Hawaii Revised Statutes stipulate that public involvement be carried out on large-scale projects such as the rail project. Thus, a broad range of print and visual media, including presentations, was employed to reach multiple population segments and is described further in Chapter 8 of the Final EIS.

Life of the Land Comments 53

The project team does not have information of the expenditures of other government-funded entities.

Life of the Land Comment 54

The Project will provide high-capacity transit service between East Kapolei and Ala Moana Center. The Project will connect multiple activity centers, provide cost-effective transit user benefits, and meet the Purpose and Need for the Project. This Project provides significant passenger capacity, which could be easily increased in the future by adding additional vehicles or decreasing headways. As a result, this Project will increase the time until another major transit upgrade is needed.

Life of the Land Comment 55

Ridership projections for the forecast year of 2030 have been developed using a travel demand model calibrated against collected traffic and transit ridership information and then validated against recent counts to be sure it properly represents travel activity in the transportation system (Section 3.2.1 of the Final EIS). An on-board transit survey was completed in December 2005 and January 2006, and the latest socioeconomic information available as of October 2008 was incorporated. Traffic counts were collected in 2005, 2007, and 2008. The model is based upon a set of realistic input assumptions regarding land use and demographic changes between now and 2030 and expected transportation levels-of-service on both the highway and public transit system. Based upon the model and these key input assumptions, approximately 116,300 trips per day are expected to use the rapid transit system on an average weekday in 2030. Since the Draft EIS was published, the travel demand model has been refined by adding an updated air passenger model (which forecasts travel in the corridor related to passengers arriving or departing at Honolulu International Airport), defining more realistic drive access modes (driving alone or car pooling) to project stations and recognizing a more robust off-peak non-home-based direct demand element (trips that do not originate or end at home) based on travel surveys in Honolulu.

Ridership is projected to reach 116,000 in 2030. This figure includes approximately 40,000 passengers who would otherwise have had to drive on the roadways. The forecasts show 88,000 riders when the full system opens in 2019. Honolulu is one of the first projects in the country to design and undertake an uncertainty analysis for this type of travel forecast. The uncertainty analysis evaluates the variability of the forecast by establishing likely upper and lower limits of ridership projections. FTA has worked closely with Honolulu during this work effort. A variety of factors were considered in the uncertainty analysis, ranging from variations

in assumptions regarding the magnitude and distribution patterns of future growth in the Ewa end of the corridor, to the impact of various levels of investment in highway infrastructure, to the expected frequency of service provided by the rapid transit system, to park-and-ride behavior with the new system in place, and to such things as the implications on ridership of vehicle and passenger amenities provided by the new guideway vehicles. Given all the factors considered, the anticipated limits for guideway ridership in 2030 are expected to be between 105,000 to 130,000 trips per day.

Life of the Land Comment 56

The General Excise and Use Tax (GET) is regressive and applied to all transactions. The GET is discussed in Section 6.3.2 of the Final EIS.

Life of the Land Comment 57

Section 4.18.6 of the Final EIS indicates that approximately 7.5 trillion BTUs will be required to construct the Project.

Life of the Land Comment 58

As shown in Table 3-18 in this Final EIS the fixed guideway will carry approximately 116,000 persons daily or approximately 36 million riders per year in 2030. Section 4.18.6 indicates that approximately 7.5 trillion BTUs will be required to construct the Project.

Life of the Land Comments 59, 60, and 61

The energy consumed could be from multiple sources. However, assuming all energy is generated from oil, the Project will have a carbon equivalence of about 20 metric tons of carbon per billion BTUs consumed (U.S. Department of Energy, Transportation Energy Data Book). Using the above values, approximately 150 thousand metric tons of carbon equivalence will be generated from construction.

Life of the Land Comments 62, 63, 64, and 65

The energy required to construct and operate the system is presented in this Final EIS. Table 4-21 in the Final EIS indicates that 1,690 million BTUs will be consumed daily in 2030 to power the Project, while the daily roadway energy consumption will decrease by 3 million BTUs daily in 2030 as a result of the operation of the system.

The energy consumed could be from multiple sources. However, assuming all energy is generated from oil, the Project will have a carbon equivalence of about 20 metric tons of carbon per billion BTUs consumed (U.S. Department of Energy, Transportation Energy Data Book). Project construction will consume approximately 210 million BTUs per annual rider. Using the estimated energy calculation provided in Comment 58 (above), construction will generate about 4 metric tons of carbon equivalence per annual rider.

Life of the Land Comment 66

The energy mix for electricity generation will depend on HECO's power production. The State of Hawaii has established a goal of using renewable energy sources for 40 percent of electricity production by 2030. In 2007, 16 percent of energy production in Hawaii was from renewable sources.

Life of the Land Comment 67

As stated in Section 2.5.2 in this Final EIS, the system will be powered by electricity.

Life of the Land Comment 68

The Draft EIS identified estimated traffic volumes for year 2030. Traffic is expected to grow with or without the Project. However, as indicated in Chapter 3, Table 3-14 of the Draft EIS (Section 3.4.1), "VMT (vehicle miles traveled), VHT (vehicle hours traveled), and VHD (vehicle hours of delay) are projected to decrease under each Build Alternative as compared to the No Build Alternative." The Final EIS shows an 18 percent decrease in VHD with the Project compared to without (Table 3-14). The use of cars in the next 10 and 20 years will be less with the Project than if the Project were not constructed.

Life of the Land Comment 69

Section 4.8 in this Final EIS evaluates visual effects of the Project. It is not possible to calculate the specific number of residential units that would be affected by the Project in a particular way. Because it is an elevated guideway, views below and above the guideway will still be available.

Life of the Land Comments 70 and 71

The transit system will provide a transportation alternative to residents. It is not planned to change the rate of population growth on Oahu. As described in Section 4.19.2 in this Final EIS, the Project will not increase or decrease regional population or the number of jobs; however, it will influence the distribution of the development, especially near transit stations. It is not possible to predict the number of people relocating to Hawaii from other states.

Life of the Land Comment 72

In the long-term, it may be appropriate to construct additional rail lines; however, Honolulu's population lives largely within a narrow corridor that is well served by a linear system.

Life of the Land Comment 73

The transit system will provide a transportation alternative to residents. It is not planned to change the rate of growth on Oahu.

Life of the Land Comment 74

As detailed in Chapter 1 in this Final EIS, the Project supports the planned development of Kapolei and the Ewa area. Section 4.2.2 in this Final EIS indicates the Ewa region is a rural and agricultural area that is undergoing urbanization and includes Kapolei, which is developing as Oahu's 'second city.' The terminal station in the west end of the Project is at East Kapolei. The west end of the Project will serve the area where both population and employment are forecasted to grow by approximately 400 percent. This growth is anticipated to occur with or without the Project. As described in Section 4.19.3 of the Final EIS, current land use plans anticipate extensive development of the Ewa plain irrespective of whether or not the Project is built. Thus, the Project may have the effect of intensifying land use in the areas near the planned stations; however, the overall development plan will not be substantially altered by the Project. The State of Hawaii prepared an Environmental Assessment (EA) of the effects of two major transportation projects, the North-South Road and Kapolei Parkway in the Ewa area. The evaluated growth-inducing and cumulative impacts of the projects under the Hawaii Environmental Policy Act, see EA § 3.15.4.

Life of the Land Comment 75

The Project resulting in any substantial change in agricultural self-sufficiency would be speculative. As detailed in Section 4.2 in this Final EIS, the Project will require some farmland that is currently owned by individuals, corporations, or agencies that plan to develop them in conformance with the Ewa Development Plan. For more detail, see Section 4.19. and Section 4.2.3 of the Final EIS.

Life of the Land Comment 76

As stated in Chapter 4, Section 4.2.3 of the Final EIS, the farmlands that will be acquired for the Project are in the Ewa Plain. The Ewa Development Plan designates areas for dense development while preserving other areas for agriculture. A maximum of 80 acres of prime farmland and 8 acres of statewide-important farmlands will be acquired by the Project, of which 70 acres are actively cultivated. All of the affected properties designated as prime, unique, or of statewide importance and/or actively farmed are owned by individuals, corporations, or agencies that plan to develop them in conformance with the Ewa Development Plan.

The 88 acres of agricultural impacts includes land needed for a maintenance and storage facility. One of the two site options for a maintenance and storage facility is in agricultural-related use (Aloun Farms) near Hoopili. The other potential site option is located near Leeward Community College and is the site of a former Navy fuel storage and delivery facility. The Leeward Community College location is the preferred site for the maintenance and storage facility, and the City has been working with the Navy to acquire it. If the City can acquire this site, only 47 acres of land designated as prime or of statewide importance will be used for the Project. Aloun Farms' headquarters, located at the Hoopili site, would not have to move if the Leeward Community College location is used.

Life of the Land Comment 77

As detailed in Section 4.11 in this Final EIS, total transportation energy consumption will decrease as a result of the Project. Combined with the State of Hawaii's commitment to

renewable electricity production, the system will substantially reduce the consumption of petroleum and therefore improve energy self-sufficiency.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
Creation Date :	12/7/2008
Creator Affiliation :	
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Submission Date :	12/07/2008
Submission Content/Notes :	I strongly support the Mass Rail Transit project. It's about time it was built. We've been talking about it for decades. As much as I dislike Councilman Djou's "tactics" to prolong the debate on the project, he has a point in building the Alea to Downtown portion first. It would bring the most ridership at the project's very beginning. The proposal to run the route by the Honolulu Airport makes more sense. It would give our visitors another option to get to Waikiki and would give residents an option of getting to the airport without our cars.

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010 RT9/09-331310

Mr. Gilbert Lee
94-226 Pouhana Loop
Waipahu, Hawaii 96797

Dear Mr. Lee:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall indentify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

As described in Section 2.5.10, Project Phasing, and further in Section 8.6.9, Construction Phasing, in the Final EIS, to support phased opening, the first construction phase must be connected to a maintenance and storage facility, which requires considerable space. No location has been identified closer to Downtown with sufficient available space to construct a maintenance and storage facility. Therefore, construction will begin between East Kapolei and Leeward Community College. The Project will be constructed in phases to accomplish the following:

- *Match the anticipated schedule for right-of-way acquisition and utility relocations.*
- *Reduce the time that each area will experience traffic and community disturbances.*
- *Allow for multiple construction contracts with smaller contract size to promote more competitive bidding.*

- *Match the rate of construction to what can be maintained with local workforce and available financial resources.*

- *Balance expenditure of funds to minimize borrowing.*

The portion of the corridor in the Ewa direction of Pearl Highlands is less developed than the areas in the Koko Head direction. Right-of-way can be obtained more quickly at the west end of the Project; therefore, overall project construction can begin earlier, resulting in lower total construction costs. Construction is planned to continue uninterrupted in the Koko Head direction from Pearl Highlands to Aloha Stadium, Kalihi, and finally to Ala Moana Center.

As portions of the Project are completed, each will be opened incrementally so that system benefits, even if limited during the initial phases, will be realized prior to completion of construction of the entire Project.

Your preference for the Airport Alternative has been noted. While each of the alternatives discussed in the Draft EIS includes trade-offs between benefits and impacts, the Airport Alternative from East Kapolei to Ala Moana has been identified as the Preferred Alternative as described above. Compared to the other alternatives discussed in the Draft EIS, the Airport Alternative will carry the most passengers, provide the greatest transit-user benefits, and result in the fewest vehicle hours of delay. It will provide access to employment centers at Pearl Harbor Naval Base and Honolulu International Airport and will serve the Salt Lake neighborhood with connecting bus service. Of the three Build Alternatives addressed in the Draft EIS, the Airport Alternative will have slightly lower impacts to the natural and built environment. During the public comment period on the Draft EIS, the public overwhelmingly supported the Airport Alternative. Of the comments that specifically supported one of the alternatives, more than 75 percent were in support of the Airport Alternative.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
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Submission Method :	Website
Other Submission Method :	
Submission Date :	11/05/2008
Submission Content/Notes :	will there be monthly passes? and if so will thebus work with the railtransit as one?

DEPARTMENT OF TRANSPORTATION SERVICES

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MUFI HANNEMANN
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WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-330370

Mr. Giancarlo Legrand
394 Lunalilo Home Road
Honolulu, Hawaii 96825

Dear Mr. Legrand:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraph addresses your comments regarding the above-referenced submittal:

The fare to use the system will be the same as for TheBus. If the system were operating today, it would be $2.25 one way or riders could use the same monthly pass you use for TheBus. As described in Chapter 2 of the Final EIS, the bus and rail systems will have a unified fare structure, including monthly passes that work for both modes. Riders will be able to use a free transfer to change from one mode to another. If TheBoat is restored in the future, the cost will be the same as well.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
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Submission Method :	Website
Other Submission Method :	
Submission Date :	02/03/2009
Submission Content/Notes :	I believe that rail transit is the answer to much of the issues surrounding the growth on the West side of Oahu. This will reduce the a great deal of the traffic into Honolulu. As a rail transit professional in California and also a resident of Kapolei, I have a real interest in this project both professionally and personally. Please advise me on any project advancement as well as any opportunities for employment. Thank you.

DEPARTMENT OF TRANSPORTATION SERVICES

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
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SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-334429

Mr. Greg Leong
greg_leong@hotmail.com

Dear Mr. Leong:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraph addresses your comments regarding the above-referenced submittal:

Your preference for a Fixed Guideway Transit Alternative has been noted. While each of the alternatives discussed in the Draft EIS includes trade-offs between benefits and impacts, the Airport Alternative from East Kapolei to Ala Moana has been selected as the Preferred Alternative as described above. As compared to the alternatives discussed in the Draft EIS, the Airport Alternative will carry the most passengers, provide the greatest transit-user benefits, and result in the fewest vehicle hours of delay. It will provide access to employment centers at Pearl Harbor Naval Base and Honolulu International Airport and will serve the Salt Lake neighborhood with connecting bus service. Of the three Build Alternatives addressed in the Draft EIS, the Airport Alternative will have slightly less impacts to the natural and built environment analyzed in the Draft EIS. During the public comment period on the Draft EIS, the public overwhelmingly supported the Airport Alternative. Of the comments that specifically supported one of the alternatives, more than 75 percent were in support of the Airport Alternative. For more information this selection is discussed in Section 2.4 of the Final EIS. Since publication of the

Draft EIS, design has been advanced, further analysis has been completed, and information has been added in response to comments on the Draft EIS and agency coordination. The Final EIS discusses the process that was used to select the Preferred Alternative, how comments were considered in the decision-making process, impacts and mitigation commitments. Updates will be available on the Project website (www.honolulutransit.org).

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

76 North King Street, Suite 203
Honolulu, Hawai'i 96817
Phone: 533-3454; E:

February 6, 2009

Ted Matley
FTA Region IX
201 Mission Street, Suite 1650
San Francisco, CA 94105

Wayne Y. Yoshioka
Department of Transportation Services
City and County of Honolulu
650 South King Street, 3rd Floor,
Honolulu, HI 96813

Katherine Puana Kealoha
Office of Environmental Quality Control (OEQC)
235 South Beretania, Suite 702
Honolulu, HI 96813

re: Honolulu High-Capacity Transit Corridor Project (DEIS)

Submitted pursuant to 49 USC 1610 et. seq., 16 USC 470(f), 49 USC 303, 42 USC 4332(2)(c), 23 CFR 771, and Hawaii Revised Statutes Chapter 343

Life of the Land is Hawai'i's own energy, environmental and community action group advocating for the people and 'aina for almost four decades. Our mission is to preserve and protect the life of the land through sound energy and land use policies and to promote open government through research, education, advocacy and, when necessary, litigation.

This document is a joint NEPA and Hawai'i Revised Statutes Chapter 343 Draft EIS. (Preface ii)

"The Council on Environmental Quality, as part of its oversight of

implementation of the National Environmental Policy Act, held meetings in the ten Federal regions with Federal, State, and local officials to discuss administration of the implementing regulations. The forty most asked questions were compiled in a memorandum to agencies for the information of relevant officials. In order efficiently to respond to public inquiries this memorandum is reprinted in this issue of the Federal Register.
http://www.nepa.gov/nepa/regs/40/40p1.htm

In response to the many requests from the agencies and other participants, CEQ has compiled forty of the most important or most frequently asked questions and their answers and reduced them to writing. The answers were prepared by the General Counsel of CEQ in consultation with the Office of Federal Activities of EPA. These answers, of course, do not impose any additional requirements beyond those of the NEPA regulations. This document does not represent new guidance under the NEPA regulations, but rather makes generally available to concerned agencies and private individuals the answers which CEQ has already given at the 1980 regional meetings. (www.nepa.gov/nepa/regs/40/40p2.htm)

NEPA's Forty Most Asked Questions (www.nepa.gov/nepa/regs/40/40p3.htm)

2a. Alternatives Outside the Capability of Applicant or Jurisdiction of Agency. If an EIS is prepared in connection with an application for a permit or other federal approval, must the EIS rigorously analyze and discuss alternatives that are outside the capability of the applicant or can it be limited to reasonable alternatives that can be carried out by the applicant?

A. Section 1502.14 requires the EIS to examine all reasonable alternatives to the proposal. In determining the scope of alternatives to be considered, the emphasis is on what is "reasonable" rather than on whether the proponent or applicant likes or is itself capable of carrying out a particular alternative. Reasonable alternatives include those that are practical or feasible from the technical and economic standpoint and using common sense, rather than simply desirable from the standpoint of the applicant.

2b. Must the EIS analyze alternatives outside the jurisdiction or capability of the agency or beyond what Congress has authorized?

A. An alternative that is outside the legal jurisdiction of the lead agency must still be analyzed in the EIS if it is reasonable. A potential conflict with local or federal law does not necessarily render an alternative unreasonable, although such conflicts must be considered. Section 1506.2(d). Alternatives that are outside the scope of what Congress has approved or funded must still be evaluated in the EIS if they are reasonable, because the EIS may serve as the basis for modifying the Congressional approval or funding in light of NEPA's goals and policies. Section 1500.1(a).

AR00002417

1. Is it reasonable to consider an at-grade (ground-level) rail system? Please elaborate.

2. Please list each document and the number of pages in each of those documents that considered an at-grade (ground-level) rail system.

3. Is it reasonable to consider an enhanced express bus system? Please elaborate.

4. Please list each document and the number of pages in each of those documents that considered an enhanced express bus system

5. What rail segments did you consider at the ground level? Please discuss each segment and why it was rejected.

6. Why were specific ground level rail segments were rejected and why? Please discuss each segment and why it was rejected.

7. What is the relative cost for ground-based and elevated rail for each segment?

8. Is there sufficient space along Farrington Highway for a ground-based track system?

9. Is there sufficient space along the H-1 in the Kapolei-Ewa area for a ground-based track system?

10. What would be impact of using an existing lane of Farrington Highway for a rail line?

11. Did you consider an above-ground line in Kapolei-Ewa becoming at-grade in the greater Waipahu area? Please elaborate.

12. Would it be better to have the train go directly to Leeward Community College or should the college be fed by a spur track?

13. How many additional riders would take the train if it stopped at Leeward Community College? Please elaborate.

14. Would it be better to have the train go directly to Waipio and Mililani or should Central Oahu have a spur track? Please elaborate.

How would a separate line, or a spur line, from Central O'ahu to this proposed line impact ridership:

15. How many additional riders would take the train if it stopped at Waipio?

16. How many additional riders would take the train if it stopped at Mililani?

17. Is there sufficient space in the land just makai of Kamehameha Highway in the Pearl Highlands Center, Pearl City Shopping Center and the Pearl Ridge Shopping Center area for at least one rail track?

18. Is there sufficient space in the land just mauka of Kamehameha Highway in the Pearl Highlands Center, Pearl City Shopping Center and the Pearl Ridge Shopping Center area for

AR00002418

at least one rail track? two tracks?

19. Is there sufficient space in the land just mauka of Kamehameha Highway in the Pearl-Harbor-Hickam area for at least one rail track? two tracks?

20. Is there sufficient space in the land just makai of Kamehameha Highway in the Pearl-Harbor-Hickam area for at least one rail track? two tracks?

21. Should there be a spur route into Pearl Harbor? Please elaborate re ridership.

22. How many additional riders would take the train if there were a spur rail line into Pearl Harbor Naval Station? Please elaborate re ridership.

23. Should there be a spur route into Hickam Air Force Base?

24. How many additional riders would take the train if there were a spur rail line into Hickam Air Force Base? Please elaborate re ridership.

25. Should the rail line go into Honolulu International Airport? Please elaborate re ridership. How would security be affected with a rail line displacing vehicle flows into the airport? What reductions in idling time by vehicles would be anticipated?

26. Should there be a rail loop at Honolulu International Airport, which could act as the beginning/end for trains going towards Honolulu or Ewa? Please elaborate.

27. Could the Airport Rail Loop end at Aloha Stadium and intersect the Ewa-Honolulu Rail Line at a transfer station? Please elaborate.

28. How many additional riders would take the train if stopped at Honolulu International Airport? Please elaborate.

29. How many additional riders would take the train if there were a loop around Honolulu International Airport? Please elaborate.

30. How many cars could park at Aloha Stadium during the day from Monday-Friday? Please elaborate. Please list all documents the City reviewed or wrote regarding this concept.

31. When did the City considered consider converting one or more lanes of the Nimitz near Iwilei to non-vehicular traffic only? Would this save money, using existing paved roads for the transit system?

32. Could one or more lanes of the Nimitz be used for a rail line?

33. Could the Rail Line go into Sand Island and then via a funnel to the Homeless Shelter-Medical School area? Could a park-and-ride rail station be built in this area?

34. What is the comparative costs associated with an above ground and a below ground route through Chinatown What is the comparative costs associated with an above ground and a below ground route along the Nimitz?

AR00002419

35. Did the City consider a route along the Ala Moana Blvd edge of Ala Moana Park?

36. Did the City consider a route along the edge of the Ala Wai Golf Course? Why or why not? What impact would this have on ridership?

37. What ground routes did consider going to any portion of the University of Hawai'i at Manoa Campus? Why or why not? What impact would this have on ridership?

38. How many additional riders would take the train if it stopped at the University of Manoa? Why or why not? What impact would this have on ridership?

39. How many additional riders would take the train went to Waikiki? Why or why not? What impact would this have on ridership?

40. Will the rail line enable greater transportation options?

41. Will these greater transportation options lead to faster population growth rates?

42. What would be the comparable ridership levels if the rail line were build from west-to-east OR east-to-west?

43. Will the transit system be encouraged that high population densities around built around transit stations?

44. How will this impact population growth projections?

45. Will land owners around planned transit stops get new development rights which will increase their property values?

46. How much will property values rise on Oahu due to the new transit stops?

47. Which Chinatowns in the U.S. or elsewhere had overhead transit lines built?

48. How did this affect those Chinatowns?

49. What analysis has been done concerning new dark spaces created by overhead transit and any change in crime, criminal behavior or potential crime?

50. Will areas under the transit line be barbed wired to prevent homeless from gathering along the route?

51. How will the rail line impact the uses of bicycles?

52. How much money has been spent by (a) the City; (b) by contractors and (c) by subcontractors in public relations regarding this proposal?

53. Please provide a list of each government-funded or partially government-funded entity and the amount of money they spend on public relations / advertisement regarding this proposed system.

AR00002420

54. Will this proposed system increase or decrease the time until another major transit upgrade is needed?

55. What is the likelihood of insufficient ridership to make the system worthwhile?

56. Is the excise tax increase regressive?

Any system that is built uses energy and releases greenhouse gases (carbon equivalence) during both the construction phase and the use phase. This information can be broken down into total use/released and per rider use/release

57. In terms of building the system: How much energy will be used?

58. In terms of building the system: How much energy per anticipated rider will be used?

59. In terms of building the system: How many tons of carbon equivalence is required

60. In terms of building the system: How many tons of carbon equivalence will be used?

61. In terms of building the system: How many tons of carbon equivalence will be used?

62. In terms of operating the system:: How much energy per anticipated rider will be used?

63. In terms of operating the system:: How many tons of carbon equivalence is required?

64. In terms of operating the system:: How many tons of carbon equivalence will be used?

65. In terms of operating the system:: How many tons of carbon equivalence will be used?

66. What fuel will be used to generate the electricity necessary to build this system?

67. What form of energy will power the system?

68. Assuming the transit system is built, what is the projected rise in the use of cars over the next ten and twenty years?

69. How many blue views of the ocean from residential units will be lost as a result of this system?

70. Will the transit system lead to a rise in population along the route?

71. What percent of that population rise will be from people not currently living in the state?

72. Should Honolulu build a single linear line of a network of intersecting transit lines?

73. How much faster can Ewa grow with the transit route installed as opposed to continuing the existing process without a transit system?

74. One Congressman testified before the State Legislature that building the line will enable tens of thousands of new homes in the Ewa region. How true is that statement?

AR00002421

75. How will pressure to develop agricultural lands be affected as a result of this project?

76. Will this project increase or decrease the likelihood that Hawai'i will become agriculturally self-sufficient? Please elaborate.

77. Will this project increase or decrease the likelihood that Hawai'i will become energy self-sufficient? Please elaborate.

Henry Curtis
Executive Director

AR00002422

Honolulu High-Capacity Transit Corridor Project

Welcome to the Honolulu High-Capacity Transit Corridor Project's Public Hearing for the Draft Environmental Impact Statement/Section 4(f) Evaluation.

This public meeting and hearing has been designed to inform the public about the transit project, explain materials contained in the Draft EIS, answer questions from the public, and collect public input on project issues related to the Draft EIS, Section 106 of the National Historic Preservation Act, Section 4(f) of the U.S. Department of Transportation Act, and floodplains affected by the project.

Please review the project information and ask project staff any questions about the project that you might have. The Draft EIS is available on the project website at www.honolulutransit.org.

You may provide official comments in several ways. Here at this Public Hearing you may provide oral comments to a court reporter who will record them for the record or use this form to provide written comments. After the meeting, you may provide an on-line comment at www.honolulutransit.org or use this form to send a written comment to the Department of Transportation Services. All comments must be postmarked or received by January 7, 2009 in order for them to be included in the Final EIS.

Name: Shirly Lin Address: Kalakaua Home

Phone: 946-9138

E-mail: -0-

Comment(s):

I am [for] High-Speed Transit project for Improve Hawaii Traffic problem.

I am [for] the Route from [Airport] the change from Salt Lake.

I think is Good Project. Go for it. !! Aloha.

AR00002423

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, 3RD FLOOR
HONOLULU, HAWAII 96813
Phone: (808) 768-8305 • Fax: (808) 768-4730 • Internet: www.honolulu.gov

MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-331984

Ms. Shirly Lin
(Incomplete address provided)

Dear Ms. Lin:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall indentify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraph addresses your comments regarding the above-referenced submittal:

Your preference for the Airport Alternative has been noted. While each of the alternatives discussed in the Draft EIS includes trade-offs between benefits and impacts, the Airport Alternative from East Kapolei to Ala Moana has been selected as the Preferred Alternative as described above. As compared to the alternatives discussed in the Draft EIS, the Airport Alternative will carry the most passengers, provide the greatest transit-user benefits, and result in the fewest vehicle hours of delay. It will provide access to employment centers at Pearl Harbor Naval Base and Honolulu International Airport and will serve the Salt Lake neighborhood with connecting bus service. Of the three Build Alternatives addressed in the Draft EIS, the Airport Alternative will have slightly less impacts to the natural and built environment analyzed in the Draft EIS. During the public comment period on the Draft EIS, the public overwhelmingly supported the Airport Alternative. Of the comments that specifically supported one of the alternatives, more than 75 percent were in support of the Airport Alternative. For more

information this selection is discussed in Section 2.4 of the Final EIS. Since publication of the Draft EIS, design has been advanced, further analysis has been completed, and information has been added in response to comments on the Draft EIS and agency coordination. The Final EIS discusses the process that was used to select the Preferred Alternative, how comments were considered in the decision-making process, impacts and mitigation commitments.

The FTA and DTS appreciate your interest in the Project. The Final EIS has been issued in conjunction with the distribution of this letter. You may view the Final EIS on the Project website at www.honolulutransit.org. You may request a DVD of the Final EIS and additional content through the "Contact Us" tab on the website or by calling the Project hotline at 566-2299. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Status :	Initial Action Needed
Creation Date :	1/22/2009
Creator Affiliation :	
First Name :	George
Last Name :	Lo
Business/Organization :	Beyaz & Patel, Inc, Engineers
Address :	800 South Broadway
Alternative Preference :	
Apt./Suite No. :	suite 200
City :	Walnut Creek
State :	CA
Zip Code :	94598
Email :	glo@beyazpatel.com
Telephone :	925-934-0707
Telephone Extension :	224
Add to Mailing List :	Email
Submission Method :	Website
Other Submission Method :	
Submission Date :	01/22/2009
Submission Content/Notes :	Is it true that after the approval of the EIR, followed by the completion of the PE, the City will put all the segments design to the public rather than are handled by PB alone?

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, 3RD FLOOR
HONOLULU, HAWAII 96813
Phone: (808) 768-8305 • Fax: (808) 768-4730 • Internet: www.honolulu.gov

MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-334273

Mr. George Lo
800 South Broadway
Suite 200
Walnut Creek, California 94598

Dear Mr. Lo:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraph addresses your comments regarding the above-referenced submittal:

To address your question, the design and construction of the various construction phases detailed in Chapter 2 of Final EIS will be completed by various contractors that will be selected through qualifications, best value, or competitive bid process, depending on the nature of the services being provided.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
Creation Date :	2/5/2009
Creator Affiliation :	
First Name :	Clint
Last Name :	Loder
Business/Organization :	
Address :	910 Kapahulu Avenue
Alternative Preference :	
Apt./Suite No. :	105
City :	Honolulu
State :	HI
Zip Code :	96816
Email :	
Telephone :	
Telephone Extension :	
Add to Mailing List :	None
Submission Method :	Website
Other Submission Method :	
Submission Date :	02/05/2009
Submission Content/Notes :	The airport route is the one that needs to be built. The number of bus routes in the airport vicinity already justifies the greater number of potential riders than Salt Lake and Pearl Harbor should be served also. Ideally the route should proceed into Waikiki to eliminate the need for taxis, shuttle vans and buses to that destination. Many Asian visitors are users of similar systems so it would be a comfortable, familiar mode. Since a goal was to serve the university population, I wonder of the possibility / feasibility / cost concerns of the route continuing through Waikiki across the Ala Wai and to the university as opposed to a spur to both? I understand the need for equipment service yards to be located to the west but please build this service as quickly as possible, prefererably from Ala Moana out. Let the park & rides and bus transfers work to keep cars from the congested downtown / Ala Moana areas.

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT10/09-338272

Mr. Clint Loder
910 Kapahulu Avenue
Honolulu, Hawaii 96816

Dear Mr. Loder:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

While each of the alternatives discussed in the Draft EIS includes trade-offs between benefits and impacts, the Airport Alternative from East Kapolei to Ala Moana has been identified as the Preferred Alternative as described above. Compared to the other alternatives discussed in the Draft EIS, the Airport Alternative will carry the most passengers, provide the greatest transit-user benefits, and result in the fewest vehicle hours of delay. It will provide access to employment centers at Pearl Harbor Naval Base and Honolulu International Airport and will serve the Salt Lake neighborhood with connecting bus service. Of the three Build Alternatives addressed in the Draft EIS, the Airport Alternative will have slightly lower impacts to the natural and built environment. During the public comment period on the Draft EIS, the public overwhelmingly supported the Airport Alternative. Of the comments that specifically supported one of the alternatives, more than 75 percent were in support of the Airport Alternative.

As described in Section 2.5.10, Project Phasing, and further in Section 8.6.9, Construction Phasing, in the Final EIS, to support phased opening, the first construction phase must be connected to a maintenance and storage facility, which requires considerable space. No location has been identified closer to Downtown with sufficient available space to construct a maintenance and storage facility. Therefore, construction will begin between East Kapolei and Leeward Community College. The Project will be constructed in phases to accomplish the following:

- *Match the anticipated schedule for right-of-way acquisition and utility relocations.*
- *Reduce the time that each area will experience traffic and community disturbances.*
- *Allow for multiple construction contracts with smaller contract size to promote more competitive bidding.*
- *Match the rate of construction to what can be maintained with local workforce and available financial resources.*
- *Balance expenditure of funds to minimize borrowing.*

The portion of the corridor in the Ewa direction of Pearl Highlands is less developed than the areas in the Koko Head direction. Right-of-way can be obtained more quickly at the west end of the Project; therefore, overall project construction can begin earlier, resulting in lower total construction costs. Construction is planned to continue uninterrupted in the Koko Head direction from Pearl Highlands to Aloha Stadium, Kalihi, and finally to Ala Moana Center.

As portions of the Project are completed, each will be opened incrementally so that system benefits, even if limited during the initial phases, will be realized prior to completion of construction of the entire Project.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

090220

Patricia O. Lohr
1296 Kapiolani Boulevard, #2906
Honolulu, Hawaii 96814
808-593-8510

January 15, 2009

Mr. Wayne Yoshioka
Director, Department of Transportation Services
City and County of Honolulu
650 South King Street, Third Floor
Honolulu, HI 96813

Dear Mr. Yosioka:

I moved to Hawaii with my disabled husband two years ago and made a sizeable investment in a condominium at 1296 Kapiolani Boulevard. Our unit faces the ocean, one block from Kona Street and Ala Moana Mall. We came to the islands to enjoy its unique beauty and tranquility, but find ourselves located in an area committed to the unsightly and noisy effects of a rail system we vehemently oppose.

I have several reasons to question the advisability of such a plan beyond the negative effects it will have on my personal enjoyment and the property value upon which our economic well-being relies.

I am hoping your response to this inquiry will allay my fears that this project is a mere monument to the current city and county administration and is in the worst interest of the misled citizens and the tourism industry upon which the state's depend so heavily.

First, the promises for tax stability seem without foundation. Even if the Federal Government provides the subsidy you seek, there seems to be no provision for maintenance and repair for the system that will obviously be required. Please address this issue.

Beyond that, there seem to be so many critical needs that have no alternative solutions than financial commitments. The priorities for improved quality of life seem to be skewed in favor of a pet project of the administration at the expense of our abysmal educational system and the rapidly deteriorating infrastructure. I was amazed to see "The Honolulu Advertiser's" headlines admitting that the mayor is willing to fight the Federal Government's assertion that the sewer system is in such desperate need of repair and expansion, it should be

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addressed without delay. The administration apparently is willing to see it deteriorate further, while eagerly devoting billions of dollars on a rail project for which there are reasonable and cost effective alternatives that you refuse to consider.

While I'm sure engineering issues are significant, I am clearly not professionally equipped to challenge them. Instead, my specific questions will address the effects on the beauty of the area and effects on the citizens and their livelihoods.

1. Honolulu should not be compared with Washington, D.C., or any other mainland city which has selected a rail system to facilitate its transportation needs. None of them possess the unique historic and cultural issues that exist here in Hawaii. None of these cities professes to be a tropical paradise and advertises itself as such to attract tourists and ensure they will return and recommend Hawaii to others. How can you ensure that the natural beauty of our island is not going to be marred by miles of concrete pillars and noisy rail cars?

2. How will the noise and the elevation of rail cars affect our dwindling bird population?

3. How will rail affect the tourists who come to Hawaii to escape the industrialization of their own areas for the beauty and serenity of the Islands? Or will they simply flock to the other islands abandoning Oahu for its fair share of the state's tourist dollar?

4. Experiencing how natural disasters are addressed here (even a relatively minor thunder storm can result in a 36-hour power outage), how will you ensure that the rail system will be sustained during emergency situations.

5. What will happen to people whose homes and/or businesses will be confiscated? What assistance will be given to people (owners and employees) who must relocate? How will they be compensated in the meantime?

6. Space for expansion to suitable locations is practically non-existent in the city now. How can you ensure there will be no detrimental consequence to businesses?

7. This project succeeded among a small-majority of voters because of the promise to generate jobs. What percentage of the jobs will require specialized skills possessed by rail-professionals and necessarily imported from the mainland?

I will look forward to your response to these questions and whatever other information you can provide to assure Oahu residents that given the economic situation facing Hawaii and the nation, it is appropriate to proceed with this costly and non-essential project.

Very truly yours,

Patricia O. Lohr

cc: Mr. Ted Matley, FTA Region IX

The Honorable Linda Lingle, Governor

City Council Members, Honolulu, HI
Tod K Apo, tapo@honolulu.gov
Donovan M. Dela Cruz, dmdelacruz@honolulu.gov
Barbara Marshall, bmarshall@honolulu.gov
Charles K. Djou, cdjou@honolulu.gov
Duke Bainum, dbainum@honolulu.gov
Rod Tam, rtam@honolulu.gov
Romy M Cachola, rcachola@honolulu.gov
Gary H Okino, gokino@honolulu.gov
Nester Garcia, ngarcia@honolulu.gov

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010 RT1/09-296220R

Ms. Patricia O. Lohr
1296 Kapiolani Boulevard, #2906
Honolulu, Hawaii 96814

Dear Ms. Lohr:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

To answer your first item, the maintenance and operations costs of the Project are discussed in Chapter 6 of the Final EIS. They represent about half of what is now being spent on TheBus and will be accommodated in the City's annual budget. Operating and maintenance costs represent between 2 and 3 percent of the City's operating budget.

All municipalities face many needs. By their actions, the City Council has decided that the transportation system in the City and County of Honolulu is one of the priorities that need immediate attention. Regarding the alternative transportation options studied, none was found to have the benefits of the fixed guideway now in development. This is discussed in Chapter 2 of the Final EIS.

Your letter also included specific questions. We will address these questions in the same order as asked.

1. *The Project was compared to Washington, D.C., for purposes of estimating operating costs only. The comparison is reported in Chapter 6 of the Final EIS. It does not suggest the two places are the same. This was done to address a review by the FTA that seeks to find comparable operating parameters in estimating costs. The cost of living in Washington, D.C. and Honolulu are very similar, which is a primary reason for the comparison.*

2. *As noted in Chapter 4 of the Final EIS, the noise impact of the Project is not significant. Rail vehicles will generate less noise than a bus at the same distance. Wildlife field surveys were performed for birds along the project alignment in September 2007, and bird point counts were conducted from December 2007 to January 2008. There will be no direct impact of the Project on the bird population. The majority of the system is located in noisy urban areas where birds coexist with people and tall buildings. The only state threatened or endangered species that is present in the study corridor is the white tern, and none of the species have critical habitat in the area. Project specifications will require that any large trees where white terns nest will not be removed or pruned until the young birds have fledged. The Honolulu High-Capacity Transit Corridor Project Ecosystems and Natural Resources Technical Report (RTD 2008j) documents the results of this survey. This report is available on the project website (www.honolulutransit.org).*

3. *Visitors to Oahu travel to many attractions within the fixed guideway corridor, as noted in Chapter 1. Table 3-13 in the Final EIS shows an increase in the number of visitors that will use transit with the addition of the Project. One of the major detriments to the visitor experience is traffic congestion, which has become a pervasive problem on the island. The Project will offer tourists a transportation alternative that links them directly with many key destinations and thereby reduce the need for use of a car. The majority of visitor facilities are located in the general Waikiki area. The Final EIS identifies Waikiki as one of the future extensions to the first construction project with the objective of serving the tourist industry. Furthermore, the corridor is largely in a well-developed portion of the island and covers primarily highly urbanized commercial districts where the transportation system is becoming increasingly congested. This is, in large part, the basis of the need for a high-capacity system.*

   The island's unique visual character and scenic beauty were considered in the visual and aesthetic analysis presented in the Draft and Final EISs. As discussed in Section 4.8 of the Final EIS, the Project will be set in an urban context where visual change is expected and differences in scales of structures are typical. The following measures will be included with the Project to minimize negative visual effects and enhance the visual and aesthetic opportunities that it creates:

- *Develop and apply design guidelines that will establish a consistent design framework for the Project with consideration of local context.*

- *Coordinate the project design with the City's transit-oriented development program within the Department of Planning and Permitting.*

- *Consult with the communities surrounding each station for input on station design elements.*

- *Consider specific sites for landscaping and trees during Final Design when plans for new plantings will be prepared by a landscape architect. Landscape and streetscape improvements will mitigate potential visual impacts.*

The Project will provide users, including tourists, with expansive views from several portions of the corridor by elevating riders above highway traffic, street trees, and low structures adjacent to the alignment. In Section 4.8.3 of the Final EIS, specific environmental, architectural, and landscape design criteria are listed that will help minimize visual effects of the Project. Increasing the number of transportation options and reducing overall traffic are also benefits to the Project for everyone, including tourists.

4. *Since trains and rail stations will be electrically powered, the system's infrastructure is being designed to handle service disruptions. For example, trains will draw power from many points along the route, so an outage in a few areas should not disrupt service overall on the system. If electrical power is lost system-wide, then train brakes are designed to stop the rail cars even without power. Lights will stay on in trains and stations; backup batteries will provide lighting for several hours. The train operations center will communicate with passengers via the public address system and intercom to provide guidance.*

   If power is restored within a short time, service will resume. With a prolonged outage, the operations center will direct passengers to exit the trains and walk along a lighted emergency walkway on the guideway to the nearest station. For those unable to exit rail cars, such as the groups referenced in your letter, help will be provided by emergency responders and transit staff. Passengers will be met at the train station by a coordinated response from emergency responders and city transportation workers. The system will be designed to meet earthquake and hurricane design standards. The system will have an upper limit on operating wind speed. Vehicles will be stored during events that exceed the operating limit.

5. *Those from whom property is to be acquired will be treated according to the requirements of the Federal Uniform Relocation Assistance and Real Property Acquisition Policies Act. The Act provides for purchase at fair market value and includes relocation assistance to those affected. It also requires that those in need of relocation be placed in comparable quarters. The Project affects few properties compared to other projects of this size and requires full acquisition of*

only 34 properties, as indicated in Chapter 4 of the Final EIS. Section 4.4.3 of the Final EIS presents the mitigation associated with acquisitions, displacements, and relocations for full and partial property acquisitions.

6. *Section 4.18.1 of the Final EIS lists the mitigation measures to reduce adverse economic hardships for existing businesses (including small businesses) along the project alignment during construction. The City's right-of-way team has contacted each potentially affected parcel owner.*

7. *Construction activities for the majority of the transit system are similar to roadway and building construction. Appendix E of the Final EIS details construction methods that are widely used for both rail transit and elevated highway construction and were employed on the H-3 Freeway. Experienced labor is locally available. A limited number of specialists will be needed to work with locally available labor in certain areas, such as transit power and signaling specialists working with local electricians to install system equipment.*

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
Creation Date :	1/8/2009
Creator Affiliation :	
First Name :	Jeff
Last Name :	Lovejoy
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State :	HI
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Telephone :	
Telephone Extension :	
Add to Mailing List :	Standard
Submission Method :	Website
Other Submission Method :	
Submission Date :	01/08/2009
Submission Content/Notes :	To make public rail transit (which I am all for) to work, this project must be either "all in" or it will fizzle and die. You must make the lines accessible to everyone across the island, not just in one small corridor along the south. You must go to all sides, and though the middle of Oahu in order to get maximum ridership an public acceptance. You also need to study the successes and failures of communities and countries where rail has either worked or fell short and disappeared. Most of all you need to change the mindset of people and special interest groups who oppose change and progress in this state all in the name of tradition and keeping Hawaii country and blockading "mainland" ideas. You need to forge ahead with these plans (and further expansion) and stop getting caught-up in all this "environmental study" foolishness which has thwarted progress. Sometimes you need to force bad-tasting medicine down someone's throat; even though they hate it, it makes them better in the end. BUILD THE RAIL!

DEPARTMENT OF TRANSPORTATION SERVICES

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-333569

Mr. Jeff Lovejoy
3674 Sims Lane
Wahiawa, Hawaii 96786

Dear Mr. Lovejoy:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

The Project will include enhanced bus service integrated with the fixed guideway system. The local bus feeder system will connect neighborhoods and commercial districts to the fixed-guideway system. In addition, experience gained from systems in other cities has been applied to the development of this Project.

Lastly, the Project is proceeding as quickly as practical, as illustrated in the schedule presented in Chapter 2 of the Final EIS. Because Federal funds will be used, it is required by law that the environmental process, as detailed in NEPA, be followed.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this

letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
Creation Date :	1/3/2009
Creator Affiliation :	
First Name :	Hugh
Last Name :	Lowery
Business/Organization :	
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Alternative Preference :	
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City :	Wahiawa
State :	HI
Zip Code :	96786
Email :	loweryh001@hawaii.rr.com
Telephone :	321-3629
Telephone Extension :	
Add to Mailing List :	Email
Submission Method :	Website
Other Submission Method :	
Submission Date :	01/03/2009
Submission Content/Notes :	I am distressed at the inaccurate low cost estimates of the rail by the City Administration. Also, estimates of usage are misleading. The few City comments on private car parking and/or bus link infrastructure are a concern. The bus replacement plans for the next few years reduce quantity of bus replacements. The rail plan cite rerouting of buses to accomodate rail station access. I am concerned about existing buses to areas not supported by rail. I am afraid that the City may "Rob Peter to Pay Paul" resulting in reduced bus support. The 10,000+ homes planned for Waipio Gentry area will exacerbate the Center of Oahu traffic for example. As a senior citizen, the increased property taxes impact me. With tourism in Hawaii reduced, I am sure the City will feel that they must increase property taxes again for to build and short term (and probably long term) subsidize rail support/use. Prior to the election, The Mayor cited very few residential and business properties would be impacted by rail. Then he said a few people would be impacted for the good of many. Now more properties are being considered for impact. Why is the City inferring that I (and all Oahu residences) should trust them because they have experts and they know what is best for us all.

DEPARTMENT OF TRANSPORTATION SERVICES

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-332358

Mr. Hugh Lowery
2618 Nonohe Street
Wahiawa, Hawaii 96786

Dear Mr. Lowery:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

Cost estimates are detailed and based on an engineering analysis of the conditions and needs of the Project. These costs are detailed in Chapter 6 of the Final EIS.

Regarding estimates of usage, as noted in Section 3.2.1 of the Final EIS, the estimates for transit ridership were derived from a travel demand forecasting model used by the Oahu Metropolitan Planning Organization for the Oahu Regional Transportation Plan 2030. *The model is based on "best practices" for urban travel models in the U.S. and guidelines established by the FTA. Ridership projections for the forecast year of 2030 have been developed using the travel demand model, which was calibrated against collected traffic and transit ridership information and then validated against recent counts to be sure it properly represents travel activity in the transportation system (Section 3.2.1 of the Final EIS). An on-board transit survey was*

completed in December 2005 and January 2006, and the latest socioeconomic information available as of October 2008 was incorporated. Traffic counts were collected in 2005, 2007, and 2008. The model is based upon a set of realistic input assumptions regarding land use and demographic changes between now and 2030 and expected transportation levels-of-service on both the highway and public transit system.

As noted in Chapter 2, Table 2-8 of the Final EIS, park-and-ride facilities will be provided at four locations: East Kapolei, UH West Oahu, Pearl Highlands, and Aloha Stadium. Certain local bus routes will be rerouted to provide frequent and reliable connections to the nearest rail station. Because of the high frequency of rail service (every three minutes during peak periods and every ten minutes during off-peak periods), riders transferring from buses to trains will experience minimal wait times. Riders transferring from trains to buses will benefit from improved frequencies on existing bus routes serving stations. In addition, several new bus routes with high frequencies will be provided as feeders to the rail system. Since these routes will primarily operate in residential areas, they will provide greater reliability versus routes operating along congested arterials.

In some cases, alterations to the bus network will enhance service to areas not supported by rail. Bus routes, or portions of routes, will only be altered or eliminated to reduce duplication of services provided by the fixed guideway system. Certain local routes will be rerouted to provide frequent and reliable connections to the nearest fixed guideway station. Buses removed from service in the study corridor will be shifted to service in other parts of the island. Additional information about changes to TheBus system is included in Appendix D of the Final EIS.

The travel demand forecasting model uses forecasted 2030 information that includes predicted land uses on Oahu, including Waipio Gentry, and resulting growth in traffic. Using the latest results of the model, the Final EIS concludes that conditions on highways will worsen by 2030. The comparison that is key to the Project is that rail will improve conditions compared to what they would be if the Project were not built.

Regarding funding for the Project, Section 6.3 of the Final EIS describes the funding sources anticipated to be used to pay for the capital costs of the Project and the City's overall public transportation system. Capital costs of the Project, including finance charges, are expected to be fully paid for by a combination of FTA Section 5307 and FTA Section 5309 New Starts funds from the Federal government and the revenues from the County's General Excise and Use Tax surcharge (GET) revenues levied from 2007 through 2022. Section 6.4 of the Final EIS describes the funding sources that will be used to pay for ongoing operating and maintenance costs associated with maintaining the resulting transit system in a state of good repair. Ordinance 07-001 prohibits the use of property taxes to fund the Project's construction. Operating and maintenance costs will be paid for from the same sources currently used for TheBus, which includes Federal funding, fare revenues, and subsidies from the City's General and Highway Funds.

Lastly, right-of-way needs for the Build Alternatives developed prior to issuance of the Draft EIS were estimated based on conceptual design. As more detailed design is prepared, right-of-way needs will continue to be refined. Refined right-of-way needs are shown in

Appendix C of the Final EIS. One goal of the Project is to minimize the amount of property and relocations by using an elevated guideway.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

-----Original Message-----
From: Ted.Matley@dot.gov [mailto:Ted.Matley@dot.gov]
Sent: Wednesday, February 04, 2009 2:21 PM
To: Miyamoto, Faith
Subject: FW: Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Project

---

From: Dave Luehring [mailto:davelue@earthlink.net]
Sent: Wed 2/4/2009 4:10 PM
To: Matley, Ted <FTA>
Subject: Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Project

February 4, 2009

Mr. Ted Matley
Department of Transportation Services
Federal Transit Administration, Region IX
201 Mission Street, Suite 1650
San Francisco, CA 94105

Dear Mr Matley:

Re: Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Project

The draft Environmental Impact Statement for the city's rail transit project is unacceptable because it is written solely for a steel wheel on steel rail system. There are other forms of fixed rail that may be better and more cost-effective than steel wheels on steel rails. Using other technologies, it may be possible to build the entire system for the same cost as steel-on-steel, thereby further mitigating the current environmental problems associated with lack of a mass transit sytem.

To build a system that costs more and delivers less, as would be the case with steel-on-steel, would adversely affect

Oahu quality of life for many years to come.

Please rewrite this EIS to cover the other technologies, such as monorail and maglev, to ensure that the city will obtain the best transit system at the best price.

Very truly yours,

Davidson Luehring
98-1230 Kulawai St.
Aiea, HI 96701-3065

AR00002446

DEPARTMENT OF TRANSPORTATION SERVICES

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT2/09-298458R

Mr. Davidson Luehring
98-1230 Kulawai Street
Aiea, Hawaii 96701-3065

Dear Mr. Luehring:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraph addresses your comments regarding the above-referenced submittal:

As noted in Chapter 2 of the Draft EIS, the selected transit technology would be electrically powered, industry-standard steel wheel on steel rail powered from a third-rail system. Technologies other than steel wheel were eliminated. An independent five-member technology panel composed of four transit experts and a transportation academic appointed by the City Council evaluated guided rubber-tire-on-concrete systems (e.g., Phileas bus system and VAL-type systems), monorail (which is a variation on rubber-tyred technology), steel-wheel-on-steel-rail systems, (e.g., light rail and rapid rail), and magnetic levitation (MAGLEV) . The panel considered the performance, cost, and reliability of the proposed technologies.

Proprietary technologies, meaning those technologies that would have required all future purchases of vehicles or equipment to be from a single manufacturer, were eliminated because none of the proprietary technologies offered substantial proven performance, cost, and reliability benefits compared to steel wheel operating on steel rail.
The panel accepted public comment twice as part of its review. By a four-to-one vote, the panel chose a steel wheel vehicle operating on steel rail system because it was considered safe, reliable, economical, and non-proprietary. Those results are documented in the panel's report to the City Council dated February 22, 2008 entitled "Independent Technology Selection Panel Report".

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
Creation Date :	12/28/2008
Creator Affiliation :	
First Name :	Steven
Last Name :	Lum
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Alternative Preference :	
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Telephone :	
Telephone Extension :	
Add to Mailing List :	Standard
Submission Method :	Website
Other Submission Method :	
Submission Date :	12/28/2008
Submission Content/Notes :	Oahu experienced another total electrical blackout on 12-26-08, the second in as many years. What backup do you have for the rail which depends on electricity? Will the rail work at all during a blackout?

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010 RT9/09-332329

Mr. Steven Lum
731 Amana Street
Apartment 1203
Honolulu, Hawaii 96814

Dear Mr. Lum:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraph addresses your comments regarding the above-referenced submittal:

Since trains and rail stations will be electrically powered, the system's infrastructure is being designed to handle service disruptions. For example, trains will draw power from many points along the route, so an outage in a few areas should not disrupt service. If electrical power is lost systemwide, then train brakes are designed to stop the rail cars even without power. Lights will stay on in trains and stations; backup batteries will provide lighting for several hours. The train operations center will communicate with passengers via the public address system and intercom and provide guidance. If power is restored within a short time, service will resume. With a prolonged outage, the operations center will direct passengers to exit the trains and walk along a lighted emergency walkway on the guideway to the nearest station. For those unable to

exit rail cars, help will be provided by emergency responders and transit staff. Passengers will be met at the train station by a coordinated response from emergency responders and City transportation workers.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

February 6, 2009

Mr. Wayne Y. Yoshioka, Director
Department of Transportation Services
City & County of Honolulu
650 South King Street, 3rd Floor
Honolulu, Hawaii 96813

Subject: Comments to the Draft EIS

I have been a passenger on the Vancouver Skytrain Expo Line and also on the Vancouver Skytrain Millenium Line and both have quite different constructed guideways. The guideway for the Expo Line is a larger concrete structure with each a separate guideway for each direction. The Millenium Line columns are much smaller with a single guideway (tracks) in both directions and a less intrusive structure. Also the approximate 14.6 mile system (more or less) of the Millenium Line was completed in two years at a cost of about $700 million in U.S. dollars and completed under budget of a $1 million in U.S. dollars in 2002. The Millenium Line costs also included 12 transit stations and the Bombardier's MK II vehicles built in B.C. at Bombardier's Centre for Advanced Transit System

Each of the transit stations of the Honolulu High-Capacity-Transit Corridor should have provisions for attractive retail outlets like newsstands, grab and go coffee/snack bars, florists, specialty stores and bank machines. This will help create more activity and extra eyes on what's going on and in and around stations, contributing to a safe and more secure environment and convenient shopping for people as they enter or depart the station. Today's consumer expect more convenience. Also convenient retail and creative art pieces will help create a memorable journey.

Creating a safe environment should be a fundamental principal of station design. Wrapping the new transit stations with glass, letting everyone see in and see through the stations. The elevators also should be enclosed in glass instead of other materials. Also a Station Manager's Office in each that is visible will help and there should be barriers in each station to ensure only paying passengers enter and leave.

Each side of the transit vehicles should have three (3) wide pairs of doors to allow passengers and bicycles to board and disembark quickly. Quick connection to local and regional bus service is a must to ensure more island-wide passengers to use this form of public transportation. The Middle Street Transit Station with its planned multi-deck parking planned will help for PUC and Windward residents to use the Honolulu High-Capacity-Transit System in both directions east and west as land is limited for parking cars for this elevated rail system.

Mahalo and blessings,

Wendell Lum

Wendell Lum (member, Kaneohe Neighborhood Board No. 30)

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, 3RD FLOOR
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Phone: (808) 768-8305 • Fax: (808) 768-4730 • Internet: www.honolulu.gov

MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT2/09-299044R

Mr. Wendell Lum
(No address or e-mail provided)

Dear Mr. Lum:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

Your comments are noted. As stated in Section 4.19.2 of the Final EIS, transit-oriented development (TOD) is expected to occur in project station areas as an indirect effect of the Project. Planning and zoning around station areas will be conducted by the City's Department of Planning and Permitting under a process covered by the City's new TOD ordinance. These plans will be developed with input from local communities within which the stations are located.

There will be between two and four doors on each transit vehicle. This will be decided when the transit vehicles are selected.

As stated in Chapter 3 of the Final EIS, because of the high frequency of the fixed guideway service (three-minute headways between trains during peak periods), riders transferring from buses to the fixed guideway will experience minimal wait times. Riders transferring from the guideway service to buses will benefit from improved frequencies on

existing bus routes serving stations. In addition, several new routes with high frequencies will be provided as feeders to the guideway system.

The FTA and DTS appreciate your interest in the Project. The Final EIS has been issued in conjunction with the distribution of this letter. You may view the Final EIS on the Project website at www.honolulutransit.org. You may request a DVD of the Final EIS and additional content through the "Contact Us" tab on the website or by calling the Project hotline at 566-2299. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

A. LONO LYMAN
P. O. Box 3896
Honolulu, Hawaii 96712-3896

February 5, 2009

City and County of Honolulu
Department of Transportation Services
650 South King Street
Honolulu, Hawaii 96813

Subject: Draft Environmental Impact Statement, Honolulu High-Capacity Corridor Project.

I support the need for a mass transit system in Honolulu, and supported the Mayor's position on the proposed transit related amendment to the City Charter that was considered this past November.

However, with regard to the Draft Environmental Impact Statement (DEIS), Honolulu High-Capacity Corridor Project, I am of the opinion that the draft document needs to address similar mass transit alternatives that would not be elevated; in other words, similar alternatives that would be built at grade for either the entire route or portions of the route. Without an analysis of at grade alternatives, there is no basis for determining that the elevated system is the preferred alternative, particularly with respect to cost, visual impacts, and noise impacts.[1] Compared to the elevated alternative, at grade alternatives would not have as significant visual impacts and would likely be less costly.

The DEIS also does not have detailed information regarding the visual and noise impacts, and detailed information how these and other adverse impacts will be mitigated. Without this detailed information, there is not a meaningful basis of evaluating the impacts and the proposed mitigation measures.

In general, and specifically with respect to the two prior comments, as drafted, the DEIS does not meet the requirements of HAR 11-200-17 (g) through (n).

Mahalo a nui loa,
A. Lono Lyman

[1] HRS §343-5 (b) states: "Whenever an agency proposes an action in subsection (a), other than feasibility or planning studies for possible future programs or projects that the agency has not approved, adopted, or funded, or other than the use of state or county funds for the acquisition of unimproved real property that is not a specific type of action declared exempt under section 343-6, the agency shall prepare an environmental assessment for such action at the earliest practicable time to determine whether an environmental impact statement shall be required." [Underscoring added]

HAR 11-200-5 (d) states: "For agency actions, chapter 343, HRS, exempts from applicability any feasibility or planning study for possible future programs or projects which the agency has not approved, adopted, or funded. Nevertheless, if any agency is studying the feasibility of a proposal, it shall consider environmental factors and available alternatives and disclose these in any future assessment or subsequent statement. . . ." [Underscoring added]

DEPARTMENT OF TRANSPORTATION SERVICES

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010 RT2/09-299169R

Mr. A. Lono Lyman
P.O. Box 3896
Honolulu, Hawaii 96712-3896

Dear Mr. Lyman:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

The Alternatives Screening Memorandum (DTS 2006a) recognized the visually sensitive areas in Kakaako and Downtown Honolulu, including the Chinatown, Hawaii Capital, and Thomas Square/Academy of Arts Special Design Districts. To minimize impacts on historic resources, visual aesthetics, and surface traffic, the screening process considered 15 combinations of tunnel, at-grade, or elevated alignments between Iwilei and Ward Avenue. Five different alignments through Downtown Honolulu were advanced for further analysis in the Alternatives Analysis, including an at-grade portion along Hotel Street, a tunnel under King Street, and elevated guideways along Nimitz Highway and Queen Street.

The Alternatives Analysis Report (DTS 2006b) evaluated the alignment alternatives based on transportation and overall benefits, environmental and social impacts, and cost considerations. The report found that an at-grade alignment along Hotel Street would require the acquisition of more parcels and potentially affect burial sites than any of the other

alternatives considered. The alignment with at-grade operation Downtown and a tunnel through the Capital Historic District, in addition to the environmental effects such as impacts to cultural resources, reduction of street capacity, and property acquisition requirements of the at-grade and tunnel sections, would cost an additional $300 million.

The Project's purpose is "to provide high-capacity rapid transit" in the congested east-west travel corridor (see Section 1.7 of the Final EIS). The need for the Project includes improving corridor mobility and reliability. The at-grade alignment would not meet the Project's Purpose and Need because it could not satisfy the mobility and reliability objectives of the Project (see bullets below). Some of the technical considerations associated with an at-grade versus elevated alignment through Downtown Honolulu include the following:

- ***System Capacity, Speed, and Reliability:*** *The short, 200-foot (or less) blocks in Downtown Honolulu would permanently limit the system to two-car trains to prevent stopped trains from blocking vehicular traffic on cross-streets. Under ideal operational circumstances, the capacity of an at-grade system could reach 4,000 passengers per hour per direction, assuming optimistic five minute headways. Based on travel forecasts, the Project should support approximately 8,000 passengers in the peak hour by 2030. Moreover, the Project can be readily expanded to carry over 25,000 in each direction by reducing the interval between trains (headway) to 90 seconds during the peak period. To reach a comparable system capacity, speed, and reliability, an at-grade alignment would require a fenced, segregated right-of-way that would eliminate all obstacles to the train's passage, such as vehicular, pedestrian, or bicycle crossings. Even with transit signal priority, the at-grade speeds would be slower and less reliable than an elevated guideway. An at-grade system would travel at slower speeds due to the shorter blocks, tight and short radius curves in places within the constrained and congested Downtown street network, the need to obey traffic regulations (e.g., traffic signals), and potential conflicts with other at-grade activity, including cars, bicyclists, and pedestrians. These effects mean longer travel times and far less reliability than a fully grade-separated system. None of these factors affect an elevated rail system. The elevated rail can travel at its own speed any time of the day regardless of weather, traffic or the need to let cross traffic proceed at intersections.*

- ***Mixed-Traffic Conflicts:*** *The planned three-minute headways on the guideway will prevent effective coordination of traffic signals in the delicately balanced signal network in Downtown Honolulu. A three minute cycle of traffic lights would affect traffic flow and capacity of cross-streets. Furthermore, there would be no option to increase the capacity of the rail system by reducing the headway to 90 seconds, which would only exacerbate the signalization problem. An at-grade system would require removal of two or more existing traffic lanes on affected streets. This effect is significant and would exacerbate congestion. Congestion would not be isolated to the streets that cross the at-grade alignment but, instead would spread throughout Downtown. The Final EIS shows that the Project's impact on traffic will be isolated and minimal with elevated rail, and in fact will reduce system-wide traffic delay by 18 percent compared to the No Build Alternative (Table 3-14 in the Final EIS). The elevated guideway will require no removal of existing travel lanes, while providing a reliable travel alternative.*

When traffic slows, or even stops due to congestion or incidents, the elevated rail transit will continue to operate without delay or interruption.

An at-grade light rail system with continuous tracks in-street, would create major impediments to turning movements, many of which would have to be closed to eliminate a crash hazard. Even where turning movements are designed to be accommodated, at-grade systems experience potential collision problems. In addition, mixing at-grade fixed guideway vehicles with cars, bicyclists, and pedestrians presents a much higher potential for conflicts compared to grade-separated conditions. Where pedestrians and automobiles cross the tracks in the street network, particularly in areas of high activity (e.g., station areas or intersections), there is a risk of collisions involving trains that does not exist with an elevated system. There is evidence of crashes between trains and cars and trains and pedestrians on other at-grade systems throughout the country. This potential would be high in the Chinatown and Downtown neighborhoods, where the number of pedestrians is high and the aging population presents a particular risk.

- ***Construction Impacts:*** *Constructing an at-grade rail system could have more effects than an elevated system in a number of ways. The wider and continuous footprint of an at-grade rail system compared to an elevated rail system (which touches the ground only at discrete column foundations, power substations and station accessways) increases the potential of utility conflicts and discovery of sensitive cultural resources. In addition, the extra roadway lanes taken away for the system would result in increased congestion or require that additional businesses or homes be taken to widen the roadway through Downtown. Additionally, the duration of short-term construction impacts to the community and environment with an at-grade system would be greater than with an elevated system. Because of differing construction techniques, more lanes would need to be continuously closed for at-grade construction and the closures would last longer than with elevated construction. This would result in a greater disruption to business and residential access.*

  Because it is not feasible for an at-grade system through Downtown to move passengers rapidly and reliably without significant detrimental effects on other transportation system elements (e.g., the highway and pedestrian systems, safety, reliability, etc.), an at-grade system would have a negative system-wide impact that would reduce ridership throughout the system. The at-grade system would not meet the Project's Purpose and Need and, therefore, does not require additional analysis.

The island's unique visual character and scenic beauty were considered in the visual and aesthetic analysis presented in the Draft and Final EISs. The assessment of visual effect due to the Project as described in Section 4.8.3 of the Final EIS considers changes to the visual landscape and viewer responses to those changes. This includes the existing development along the Project alignment. Within the Project corridor the environment changes from rural at the Wai'anae end of the corridor to dense high-rise development at the Koko Head end. As part of the design process, the City has developed design principles, which are identified in the Honolulu High-Capacity Transit Corridor Project Compendium of Design Criteria (RTD

2009m) that will be implemented in final design to minimize visual effects of the Project. For example, guideway materials and surface textures will be selected in accordance with generally accepted architectural principles to achieve effective integration between the guideway and its surrounding environment. Landscape and streetscape improvements will mitigate potential visual impacts, primarily for street-level views.

Other measures to address visual impacts of the Project are being developed through the station design and planning process. The initial station area plans and design guidelines were first developed with coordination between DTS and the Department of Planning and Permitting (DPP). The next level of transit station design focuses on integrating individual neighborhood characteristics of the communities served by the stations.

The following mitigation framework will be included in the Project to minimize negative visual effects and enhance the visual and aesthetic opportunities that it creates:

- *Develop and apply design guidelines that will establish a consistent design framework for the Project with consideration of local context.*
- *Coordinate the project design with City TOD planning and DPP.*
- *Consult with the communities surrounding each station for input on station design elements.*
- *Consider specific sites for landscaping and trees during the final design phase when plans for new plantings will be prepared by a landscape architect. Landscape and streetscape improvements will serve to mitigate potential visual impacts.*

Section 4.8.3 of the Final EIS, Design Principles and Mitigation includes information related to the mitigation framework described above. Specifically architecture and landscape design criteria include guidelines regarding site design, materials and finishes, and lighting, which apply to stations, station areas, and the guideway.

As stated in Section 4.10.3 of the Final EIS, the Project will cause no severe noise impacts. Moderate impacts will occur at upper floors of a few high-rise buildings (as shown in Table 4-18 in the Final EIS). With the recommended mitigation in place (sound absorbing material and wheel skirts), the noise analysis indicates that the new noise generated by the Project will be lower than the existing noise levels in most places.

The project design includes an integrated noise-blocking parapet wall at the edge of the guideway structure that extends three feet above the top of the rail. The parapet wall will substantially reduce ground-level noise.

Wheel skirts will increase the benefit from the parapet wall at locations above the elevation of the track. The use of sound-absorptive materials below the tracks in the areas that will experience moderate noise impacts will reduce the Project noise levels from the upper floors to below the impact level. Once the Project is operating, noise levels will be re-measured to confirm that there are no noise impacts from the Project.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

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Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
Creation Date :	11/26/2008
Creator Affiliation :	
First Name :	Jerry
Last Name :	Lynch
Business/Organization :	Baywest
Address :	4496 Aukai Avenue
Alternative Preference :	Airport
Apt./Suite No. :	
City :	Honolulu
State :	HI
Zip Code :	96816
Email :	jerrylynch@mac.com
Telephone :	
Telephone Extension :	
Add to Mailing List :	None
Submission Method :	Website
Other Submission Method :	
Submission Date :	11/26/2008
Submission Content/Notes :	The Airport Option is best for everyone. Every major City with Rail strives to connect it to the Airport.

DEPARTMENT OF TRANSPORTATION SERVICES

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-330915

Mr. Jerry Lynch
4496 Aukai Avenue
Honolulu, Hawaii 96816

Dear Mr. Lynch:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall indentify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraph addresses your comments regarding the above-referenced submittal:

Your preference for the Airport Alternative has been noted. While each of the alternatives discussed in the Draft EIS includes trade-offs between benefits and impacts, the Airport Alternative from East Kapolei to Ala Moana has been selected as the Preferred Alternative as described above. As compared to the alternatives discussed in the Draft EIS, the Airport Alternative will carry the most passengers, provide the greatest transit-user benefits, and result in the fewest vehicle hours of delay. It will provide access to employment centers at Pearl Harbor Naval Base and Honolulu International Airport and will serve the Salt Lake neighborhood with connecting bus service. Of the three Build Alternatives addressed in the Draft EIS, the Airport Alternative will have slightly less impacts to the natural and built environment analyzed in the Draft EIS. During the public comment period on the Draft EIS, the public overwhelmingly supported the Airport Alternative. Of the comments that specifically supported one of the

alternatives, more than 75 percent were in support of the Airport Alternative. For more information this selection is discussed in Section 2.4 of the Final EIS. Since publication of the Draft EIS, design has been advanced, further analysis has been completed, and information has been added in response to comments on the Draft EIS and agency coordination. The Final EIS discusses the process that was used to select the Preferred Alternative, how comments were considered in the decision-making process, impacts and mitigation commitments.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
Creation Date :	12/3/2008
Creator Affiliation :	
First Name :	Brittany
Last Name :	Maae
Business/Organization :	
Address :	
Alternative Preference :	
Apt./Suite No. :	
City :	
State :	HI
Zip Code :	96826
Email :	bmaae@hawaii.edu
Telephone :	
Telephone Extension :	
Add to Mailing List :	Email
Submission Method :	Website
Other Submission Method :	
Submission Date :	12/03/2008
Submission Content/Notes :	I'm doing a research project for college. Will you please answer the follow: 1. Is It possible that some how the rail can get damaged? If so where will the money come from? 2. Are you 100% sure that enough people will even ride the rail, so that our traffic problem will die down? 3. What types of job will be available? 4. Is rail necessary? If so why?

DEPARTMENT OF TRANSPORTATION SERVICES

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010 RT9/09-331014

Ms. Brittany Maae
bmaae@hawaii.edu

Dear Ms. Maae:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall indentify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

To answer your first question, yes, the rail system could be damaged in the same way that any building or transportation system could be damaged. The system budget does include maintenance and repair funding.

As stated in Section 3.2.1, rail ridership was analyzed using a Travel Demand Forecasting Model, which is also used by the Oahu Metropolitan Planning Organization. The approach has proven to be effective in estimating traffic impacts in other cities. This model is based on guidelines established by the FTA. Traffic conditions will be worse in 2030 under any circumstance and regardless of which solution is applied. The Alternatives Analysis stated this. The comparison that is key to the Project is that rail will improve conditions compared to what they would be if the Project were not built. With the fixed guideway system, total islandwide congestion (as measured by vehicle hours of delay) will decrease by 18 percent, compared to the No Build Alternative (as shown in Table 3-14 in the Final EIS). Accordingly, traffic

conditions will be substantially better with the Project than any of the other potential solutions studied. In addition to the fixed guideway, there are approximately $3 billion in proposed transportation improvements included in the Oahu Regional Transportation Plan. These include widening the H-1 Freeway and other facilities at key choke points, adding a westbound zipper lane, and other substantial transportation projects. A list of these projects can be found in Table 2-4 of the Final EIS. The traffic assessment conducted for the Draft and Final EISs included these projects in the modeling done for the No Build and Build Alternatives.

Many types of jobs will be needed for this Project. During construction, a broad range of planners, engineers, and construction workers will be employed on the Project. After completion of construction, direct employment by the Project will include operators, maintenance personnel, and supporting staff for the system.

In response to your question regarding whether rail is necessary, you can find a discussion of the process that determined that rail transit is the best option for improving person-mobility for Honolulu in Chapter 2 of the Final EIS.

The FTA and DTS appreciate your interest in the Project. The Final EIS has been issued in conjunction with the distribution of this letter. You may view the Final EIS on the Project website at www.honolulutransit.org. You may request a DVD of the Final EIS and additional content through the "Contact Us" tab on the website or by calling the Project hotline at 566-2299. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Status :	Initial Action Needed
Record Date :	11/24/2008
Creator Affiliation :	Other
First Name :	Sharon
Last Name :	MacQuoid
Business/Organization :	
Address :	411 Iliaina Street
Alternative Preference :	Airport
Apt./Suite No. :	
City :	Kailua
State :	HI
Zip Code :	96734
Email :	
Telephone :	
Telephone Extension :	
Add to Mailing List :	None
Submission Method :	Website
Other Submission Method :	
Submission Date :	11/24/2008
Submission Content/Notes :	I support the route that stops at the airport and believe that we need a parking structure in that area to assist Windward residents.

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-330788

Ms. Sharon MacQuoid
411 Iliaina Street
Kailua, Hawaii 96734

Dear Ms. MacQuoid:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

Your preference for the Airport Alternative has been noted.

While each of the alternatives discussed in the Draft EIS includes trade-offs between benefits and impacts, the Airport Alternative from East Kapolei to Ala Moana has been selected as the Preferred Alternative as described above. As compared to the alternatives discussed in the Draft EIS, the Airport Alternative will carry the most passengers, provide the greatest transit-user benefits, and result in the fewest vehicle hours of delay. It will provide access to employment centers at Pearl Harbor Naval Base and Honolulu International Airport and will serve the Salt Lake neighborhood with connecting bus service. Of the three Build Alternatives addressed in the Draft EIS, the Airport Alternative will have slightly less impacts to the natural and built environment analyzed in the Draft EIS. During the public comment period on the Draft EIS, the public overwhelmingly supported the Airport Alternative. Of the comments that specifically supported one of the alternatives, more than 75 percent were in support of the

Airport Alternative. For more information this selection is discussed in Section 2.4 of the Final EIS. Since publication of the Draft EIS, design has been advanced, further analysis has been completed, and information has been added in response to comments on the Draft EIS and agency coordination. The Final EIS discusses the process that was used to select the Preferred Alternative, how comments were considered in the decision-making process, impacts and mitigation commitments.

As shown in Table 2-8 of the Final EIS, park-and-ride facilities will be constructed at four fixed guideway stations: East Kapolei, UH West Oahu, Pearl Highlands, and Aloha Stadium.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

From: Major, Beverly [mailto:bdmajor@leoadaly.com]
Sent: Friday, February 06, 2009 2:37 PM
To: Yoshioka, Wayne; ted.matley@fta.dot.gov; governor.lingle@hawaii.gov
Subject: Objections to Rail DEIS

Subject: Objections to Rail DEIS

Dear Governor Lingle, Mr. Yoshioka and Mr. Matley,

I'm writing to express grave concerns over deficiencies in the DEIS for Honolulu's heavy rail system.

I found the draft EIS statement to be deficient in numerous areas and have specific questions and concerns about the following:

1. How will this project affect current traffic congestion?
2. The comparison of energy use of rail to bus should be done for hybrids, not traditional combustion engine as this report appears to have done.
3. It is unclear how congestion will be remedied during the many years of construction. Lanes of traffic are to be eliminate in certain areas. Where and when this will happen, and what will happen to congestion in those areas?
4. Will there be bike racks on the train and where will they be located? Will bikes be allowed on the tr ain? Will there be a place for surfboards? What about luggage for airport passengers? What about construction workers' tools?
5. The impacts of relocations has not been adequately addressed for important food producers like Aloun Farms, 14 community facilities that will be "partially acquired" as well as small businesses that will not survive a move or reduction in operations. Historic and cultural sites are also not adequately addressed.
6. There is insufficient information on plans to mitigate noise at the 16 schools that are adjacent to the alignment. How will the noise affect the learning environment?

7. The analysis of job creation does not adequately analyze job losses. There is no mention of what will happen to the jobs that are lost due to businesses downturn during construction?
8. The report does not adequately assess the potential harm an elevated rail system does to our unique tourist industry and the image of Oahu. How will the tourists see noise and visual impacts of heavy rail? Will the more idyllic neighbor Islands absorb an even larger share of tourism and hurt our County's revenues?
9. The provisions for managing with lower than projected ridership and tax revenue support are inadequate.
10. Th e plan is also deficient in outlining how corrosion will be mitigated. BART in the SF bay are is made of aluminum. What will happen to steel in a salt air environment? An evaluation of steel vs. aluminum is lacking in this report.
11. Likewise, the DEIS plans for mitigation of graffiti on the concrete support pillars, stations and cars is inadequate. This deficiency will impact the accuracy of predicting the future cost of the project maintenance.
12. Finally, I have concerns that the ADA issues have not been adequately assessed. How long will the doors be open for to access the train? How will an elderly or handicapped person be able to get on and off the train in this time period? Please provide detailed plans on handling handicapped access. How does this effect the efficiency of the train and speed of commute?

Thank you for your thoughtful consideration of my concerns. Please feel free to call me if you have any questions about this letter.

Aloha,
Beverly Major,

521-8889

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010 RT2/09-299052R

Ms. Beverly Major
bdmajor@leoadaly.com

Dear Ms. Major:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address your comments received from agencies and the public on the Draft EIS. The following paragraphs, based on how your comments were formatted, address comments regarding the above-referenced submittal:

1. A travel demand forecasting model was used to forecast traffic conditions at six screenlines during the a.m. and p.m. peak hours. The model showed that in 2030, the Project will reduce congestion up to 11 percent during the a.m. peak hour and up to 10 percent during the p.m. peak hour over the No Build Alternative (as shown in Tables 3-9 and 3-10 in the Final EIS). In addition, vehicle hours of delay will decrease by 18 percent with the Project compared to No Build conditions (Table 3-14 of the Final EIS).

As shown in Table 3-23 of the Final EIS, project-related traffic will affect delay at six intersections in the corridor. The Project includes measures that will mitigate these effects (as discussed in Section 3.4.7 of the Final EIS). As a result, the Project will not negatively affect traffic congestion.

2. The energy use analysis presented in the Draft and Final EISs includes all vehicles currently operating on Oahu, as presented in Section 4.11.1, "The analysis of operational energy consumption on Oahu was based on the transportation analysis prepared for the Project. Changes in overall transportation energy use for vehicles traveling on Oahu were assessed using daily [vehicle miles traveled] and speed values calculated from the transportation demand forecasting model." Hybrid vehicles do not account for a large enough percentage for the vehicle mix to change the project-wide energy consumption calculations.

3. As discussed in Chapter 3 of the Final EIS, a Maintenance of Traffic (MOT) Plan will identify measures to mitigate temporary construction-related effects on transportation. The contractor will develop the MOT Plan with approval from the City or Hawaii Department of Transportation. The MOT Plan will address roadway closures for streets identified in Table 3-27 of the Final EIS. Additional temporary lane closures will occur during non-peak hours so that effects on heavy commuter traffic will be minimized. As stated in Section 3.5.7 of the Final EIS, an extensive public information program will be implemented to provide motorists with a thorough understanding of the location and duration of construction activities, as well as anticipated traffic conditions.

As stated in Section 3.4.3 and shown in Table 3-21 of the Final EIS, there will be no permanent reduction in the number of roadway travel lanes with the Project.

4. Bike racks will be available at all stations. Bicycles, surfboards, luggage, and construction workers' tools will be allowed on trains subject to some restrictions during heavy peak periods, according to policies which are yet to be developed. These items will be allowed on trains as long as they do not impede other passengers or pose safety risks.

5. There are two site options being considered for a maintenance and storage facility. The preferred site is near Leeward Community College (LCC) and is the site of a former Navy fuel drumming operation. Discussions are under way with the Department of Hawaiian Home Lands to acquire it. An alternate site is in Hoopili, which is the location of Aloun Farms. If the Project can acquire the LCC site, then the impact on agricultural lands on Oahu will be much less than is described in the Draft and Final EISs and Aloun Farms' headquarters would not have to move as a result of the Project.

Relocations are discussed in Section 4.4 of the Final EIS, and impacts to archaeological, cultural and historic resources are discussed in Section 4.15. A partial acquisition typically is either a narrow strip of land or a more substantial portion of a large parcel. It is assumed that for the properties that will be partially acquired, existing land uses will not change. For residential properties, if the right-of-way line comes within approximately five feet of a residential structure, it is considered a full acquisition. If the right-of-way line is more than five feet, it will generally be considered a partial acquisition. For commercial properties, including situations where the commercial property could lose its function, full acquisition was considered. Businesses and residents from whom property is to be acquired will be treated according to the requirements of the Federal Uniform Relocation Assistance and Real Property Acquisition Policies Act. It provides for purchase at fair market value and includes relocation assistance to those affected. The Act provides that those in need of relocation must be placed in comparable (living or business) quarters.

6. The project design includes an integrated noise-blocking parapet wall at the edge of the guideway structure that extends three feet above the top of the rail. The parapet wall will substantially reduce ground-level noise. Wheel skirts will increase the benefit from the parapet wall at locations above the elevation of the track. The use of sound-absorptive materials below the tracks in the areas that will experience moderate noise impacts will reduce the Project noise levels from the upper floors to below the impact level. Once the Project is operating, noise levels will be re-measured to confirm that there are no noise impacts from the Project. No noise impacts are predicted for any schools along the alignment. For schools and other noise-sensitive locations that do not have nighttime sleep activities, the FTA Transit Noise and Vibration Impact Assessment compares the existing maximum-hour noise level to the maximum-hour noise that the transit line will produce by itself. A project noise level of 63 dBA or above would be an impact. The Project is predicted to have a maximum-hour Leq noise level of 51 dBA. Noise impacts are not predicted at the schools, and maximum-hour noise levels will stay the same.

In addition, construction noise will be a short-term impact and all local noise ordinances will be followed to reduce noise annoyance to the residence and schools. A variance will be obtained from the Hawaii Department of Health. The permit will regulate construction times and activities and include mitigation commitments.

7. An analysis of construction impacts to businesses is provided in Section 4.17.1 of the Draft EIS, 4.18.1 of the Final EIS, and Section 5.2.2 of the Economics Technical Report. This report is available at the City and County of Honolulu and the Department of Transportation Service offices and on the project website (www.honolulutransit.org). The primary impacts are anticipated to result from inconveniences and disruptions to adjacent residents, businesses, and business customers that are inherent in any major construction project, and include the following:

- *Presence of construction workers and materials.*
- *Temporary road closures and traffic diversions.*
- *Temporary reductions in parking availability.*
- *Airborne dust, noise, and vibrations.*
- *Businesses's loss of visibility to their customers.*

Section 4.18.1 of the Final EIS states that proposed mitigation to reduce adverse economic hardships for existing businesses along the project alignment during construction may include the following:

- *Coordinate construction planning and phasing with nearby property owners and businesses.*
- *Develop a public involvement plan prior to construction to inform business owners of the construction schedule and activities.*

- *Minimize the extent and number of businesses, jobs, and access affected during construction.*

- *To the extent practicable, coordinate the timing of temporary facility closures to minimize impacts to business activities, especially those related to seasonal or high sales periods.*

- *Minimize, as practical, the duration of modified or lost access to businesses.*

- *Provide signage, lighting, or other information to indicate that business are open.*

- *Provide public information (press releases, newsletters) regarding construction activities and ongoing business activities, including advertisements in print and on television and radio.*

- *Phase construction in each area so as to maintain access to individual businesses for pedestrians, bicyclists, passenger vehicles, and trucks during business hours and important business seasons.*

- *Provide advance notice if utilities will be disrupted and schedule major utility shutoffs during non-business hours.*

Overall, the Project is projected to increase jobs in the nine years of construction to an average of about 10,000 per year, see Table 4-35 in the Final EIS.

8. Negative impacts of the rail system with respect to property values and tax impact are detailed in the Economics Technical Report. Section 4.2.2 of the Draft EIS and Section 4.3.2 of the Final EIS summarize the impact of railway construction on Real Property Taxes.

Aesthetic effects of the system are described in Section 4.8 of the Final EIS. The Project is substantially different from systems in New York and Chicago, as it will have a different structural design. There is no evidence that the Project will have a negative impact on the tourism industry. Section 4.19 of the Final EIS states, "the economic forecast is for continued steady growth. Planned projects are intended to continue to encourage and enable economic growth in the region. Continued focus on tourism is anticipated."

The Project will offer tourists a transportation alternative that links them directly with many key destinations and reduce the need for a car. Table 3-13 in the Final EIS shows daily person transit trips by purpose, broken down for residents and visitors. As seen in this table, transit trips for both groups increase with the addition of the Project compared to the No Build Alternative. Daily resident person trips by transit increase 24 percent with the Project compared to without, while daily visitor person trips by transit increase 19 percent with the Project compared to without the Project in 2030. As stated in Section 3.4.2 of the Final EIS, approximately 9,900 visitors are expected to use the system daily, of which 1,800 are to or from the airport.

The island's unique visual character and scenic beauty were considered in the visual and aesthetic analysis presented in the Draft and Final EISs. As discussed in Section 4.8 of the Final EIS, the Project will be set in an urban context where visual change is expected and differences in scales of structures are typical. The following measures will be included with the Project to minimize negative visual effects and enhance the visual and aesthetic opportunities that it creates:

- *Develop and apply design guidelines that will establish a consistent design framework for the Project with consideration of local context.*
- *Coordinate the project design with the City's transit-oriented development program within the Department of Planning and Permitting.*
- *Consult with the communities surrounding each station for input on station design elements.*
- *Consider specific sites for landscaping and trees during Final Design when plans for new plantings will be prepared by a landscape architect. Landscape and streetscape improvements will mitigate potential visual impacts.*

The Project will provide users, including tourists, with expansive views from several portions of the corridor by elevating riders above highway traffic, street trees, and low structures adjacent to the alignment. The fact that this will be the only island with high-capacity transit, with an efficient airport connector, may attract more tourists who value the convenience, potential cost savings, and decreased travel time between various tourist destinations along the Project's alignment. In Section 4.8.3 of the Final EIS, specific environmental, architecture, and landscape design criteria are listed that will help minimize visual effects of the Project.

9. Both ridership and financial discussions in the Final EIS address concerns about the uncertainties associated with ridership and financial markets. Ridership projections for the forecast year of 2030 have been developed using the travel demand model used by the Oahu Metropolitan Planning Organization (OahuMPO), which was calibrated against collected traffic and transit ridership information and then validated against recent counts to be sure it properly represents travel activity in the transportation system (Section 3.2.1 of the Final EIS). An on-board transit survey was completed in December 2005 and January 2006, and the latest socioeconomic information available as of October 2008 was incorporated. Traffic counts were collected in 2005, 2007, and 2008. The OahuMPO model is based on "best practices" for urban travel models in the U.S. and consistent with guidance from the FTA. The model is updated approximately every five years to reflect changes in land use, socioeconomic conditions, and transportation network improvements. The model is approved by the OahuMPO Technical Advisory Committee. The model is based upon a set of realistic input assumptions regarding land use and demographic changes between now and 2030 and expected transportation levels-of-service on both the highway and public transit system. Based upon the model and these key input assumptions, approximately 116,000 trips per day are expected to use the rapid transit system on an average weekday in 2030. Since the Draft EIS was published, the travel demand model has been refined by adding an updated air passenger model (which forecasts travel in the corridor related to

passengers arriving or departing at Honolulu International Airport), defining more realistic drive access modes (driving alone or car pooling) to project stations and recognizing a more robust off-peak non-home-based direct demand element (trips that do not originate at home) based on travel surveys in Honolulu.

The Project is one of the first in the country to design and undertake an uncertainty analysis of this type of travel forecast. The uncertainty analysis evaluates the variability of the forecast by establishing probabilistic upper and lower limits of ridership projections. FTA has worked closely with the City during this effort. A variety of factors were considered in the uncertainty analysis. Given all the factors considered, the anticipated limits for guideway ridership in 2030 is expected to be between 105,000 to 130,000 trips per day, bracketing the official forecast of 116,000 riders a day used for all calculations.

The capital plan for the Project is presented in Section 6.3 of the Final EIS, which includes a description of the amount of funding anticipated from various sources. The capital plan takes the current economic downturn into account. Section 6.6 of the Final EIS describes risks and uncertainties associated with these funding assumptions. The financial plan is a dynamic document that will be updated as conditions warrant.

10. Bay Area Rapid Transit (BART) is a steel-on-steel system, the same type as proposed for Honolulu. This was a question discussed by the technology panel and it found that corrosion is not a significant issue with steel-on-steel systems in any kind of climate. Steel-on-steel systems exist throughout the world on other islands, in high-humidity climates, volcanic environments, etc., and they operate without issues. Nonetheless, corrosion is part of the design considerations in ensuring the system performs as effectively as possible. The vehicle shell for the BART system is made of aluminum; however, the vehicle for Honolulu has not yet been designed, so it could be aluminum or some other equally effective material.

Corrosion-control measures will be applied to the Project's fixed-steel facilities and neighboring utility structures to provide proper operation over their lifetime. These measures include the following:

- *Protective coating specification for steel aerial structures.*
- *Coating specification for stations.*
- *Preventive measures against stray current corrosion.*
- *Corrosion-control design of transit underground utilities and neighboring utilities owned by others.*

11. Section 4.6.3 of the Final EIS describes potential safety and security issues once the Project is operating. The discussion notes that to reduce the potential for crime, the FTA requires the development and implementation of a Safety and Security Management Plan for new fixed guideway projects (49 CMR 633). Graffiti is one of the safety and security issues that will be addressed. The Project is looking into using graffiti-resistant materials, where possible, to

minimize graffiti. Graffiti removal is an anticipated maintenance activity and is reflected in project costs.

12. The transit system will conform to guidelines of the Americans with Disabilities Act (ADA). Elevators and escalators will be provided at all stations. In addition, platforms will be level with trains for ease of boarding; therefore, stairs or lifts, as used on buses, will not be required. The system operation plan considers all ADA requirements. Dwell time is anticipated to be an average of 20 seconds at each station. This dwell time is incorporated into the station-to-station travel times presented in Table 3-16 of the Final EIS. As shown, travel from the East Kapolei Station to the Ala Moana Center Station will take 42 minutes.

The FTA and DTS appreciate your interest in the Project. The Final EIS has been issued in conjunction with the distribution of this letter. You may view the Final EIS on the Project website at www.honolulutransit.org. You may request a DVD of the Final EIS and additional content through the "Contact Us" tab on the website or by calling the Project hotline at 566-2299. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Status :	Initial Action Needed
Creation Date :	12/27/2008
Creator Affiliation :	
First Name :	Christopher
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Telephone Extension :	
Add to Mailing List :	Both
Submission Method :	Website
Other Submission Method :	
Submission Date :	12/27/2008
Submission Content/Notes :	I understand the concept of rail very well, I have lived in San Francisco for about two years then returned home in Ewa Beach, and have taken many commuter rails such as CALtrain/Muni Metro/ VTA and BART. I prefer BART because of its speed, as well as length of trains and its similarities to what Hawaii is planning. We (the people of Hawaii) need to start thinking of a designated length of train (how many cars long) and our own design. Ever television ad that I have seen so far, only depicts a train that is two cars long, and in turn can give the public second thoughts. "If the train will only be that long, whats the point in even taking it, if I have to wait in a crowded station anyway?" BART trains, in my experience have ranged anywhere from 4-10 cars long, allowing for more passengers to travel at once. We need to start thinking of our own design(s) as well as educating the general public that the planned rail project doesn't just have to be whats depicted on TV, but what is depicted is just an idea borrowed from other rail systems.

DEPARTMENT OF TRANSPORTATION SERVICES

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-332260

Mr. Christopher Mapa
91173 Fort Weaver Road
Ewa Beach, Hawaii 96706

Dear Mr. Mapa:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

As described in Chapter 2 of the Final EIS, the system is planned to operate with multi-vehicle trains approximately 120 to 180 feet long, with each train capable of carrying 325 to 500 passengers. The system will be expandable to accommodate longer trains in the future. Smaller trains at higher frequencies reduce waiting times and maximize convenience for passengers.

The Honolulu system, while based on industry standard technology, is being designed to reflect local demand patterns and integrate into the existing environment. Section 2.2.2 of the Draft EIS summarizes system requirements. These have been further detailed in Section 2.5 of the Final EIS.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
Creation Date :	1/1/2009
Creator Affiliation :	
First Name :	Christopher
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Add to Mailing List :	Email
Submission Method :	Website
Other Submission Method :	
Submission Date :	01/01/2009
Submission Content/Notes :	I have another question. Since most other train require operators, have there been requirements put into place for becoming a train operator for the new Hawaii Rail System. From what I learned, individuals have to be at least 21 years of age to apply as a train operator, and hold a class C license. Is that true for Hawaii as well?

DEPARTMENT OF TRANSPORTATION SERVICES

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-332342

Mr. Christopher Mapa
mapa.christopher@gmail.com

Dear Mr. Mapa:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

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Job specifications will be developed by the system operator and approved by the City. Operation is scheduled to begin in 2012, and job requirements are expected to be established about a year before the positions are needed.

The FTA and DTS appreciate your interest in the Project. The Final EIS has been issued in conjunction with the distribution of this letter. You may view the Final EIS on the Project website at www.honolulutransit.org. You may request a DVD of the Final EIS and additional content through the "Contact Us" tab on the website or by calling the Project hotline at 566-2299. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

2/4/09

To: Wayne Yoshioka
From: Robert B. Marrone

Aloha,

On page 1-17 of the DEIS, Figure 1-10 indicates Use of the HOV lane reduces a.m. town-bound travel time by an average of 12 minutes. This appears to be a greater reduction in travel time than what a full service rail line, with all planned stops, would provide. Further, it can be presumed that additional HOV lanes would reduce travel time by an even greater margin. Hence, I would like to know why additional HOV lanes would not be the primary option under consideration.

Sincerely,

Robert B. Marrone
1303 Dominis St. #1
Honolulu, HI 96822

DEPARTMENT OF TRANSPORTATION SERVICES

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT2/09-299013R

Mr. Robert B. Marrone
1303 Dominis Street, #1
Honolulu, Hawaii 96822

Dear Mr. Marrone:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraph addresses your comments regarding the above-referenced submittal:

High-occupancy vehicles (HOV) already experience improvements in travel time. Providing national HOV lanes would not result in substantial additional improvement for the HOVs already using the system. In addition, roadway congestion will worsen by 2030. As shown in Tables 3-9 and 3-10 in the Final EIS, the H-1 Freeway HOV at the Kalauao screenline would deteriorate from LOS E in 2005 to LOS F in 2030 without the Project. The Project will reduce congestion on roadways and, as a result, the H-1 Freeway HOV lane will operate at LOS E with the Project. Lastly, the guideway operates in an exclusive right-of-way and, therefore, travel times on the guideway will not be affected by local traffic conditions.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of

this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

RT12/08-291103

Bishop Museum was founded in 1889 by Charles Reed Bishop as a memorial to his wife, Princess Bernice Pauahi Bishop, the last direct descendant of King Kamehameha I. The original collections were housed on the royal family homestead.

Hawaiian Hall—built from 1898 to 1903, this Victorian masterpiece features three floors of artifacts that illuminate the fascinating history, culture and ethnic diversity of Hawai'i.

08 DEC 2008 PM 2 L

re: rail route.
We'd favor Pearl City
to town, via the airport.
for the first phase.

Martinez Family
67-275 Farrington Hwy.
Waialua, HI 96791

Dept of Transportation
Services
650 S. King St.
3rd floor
Honolulu HI

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www.bishopmuseum.org • Printed in Australia

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WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT10/09-336249

Martinez
67-275 Farrington Highway
Waialua, Hawaii 96791

Dear Martinez:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraph addresses your comments regarding the above-referenced submittal:

As described in Section 2.5.10, Project Phasing, and further in Section 8.6.9, Construction Phasing, in the Final EIS, to support phased opening, the first construction phase must be connected to a maintenance and storage facility, which requires considerable space. No location has been identified closer to Downtown with sufficient available space to construct a maintenance and storage facility. Therefore, construction will begin between East Kapolei and Leeward Community College. The Project will be constructed in phases to accomplish the following:

- *Match the anticipated schedule for right-of-way acquisition and utility relocations.*
- *Reduce the time that each area will experience traffic and community disturbances.*

- *Allow for multiple construction contracts with smaller contract size to promote more competitive bidding.*
- *Match the rate of construction to what can be maintained with local workforce and available financial resources.*
- *Balance expenditure of funds to minimize borrowing.*

The portion of the corridor in the Ewa direction of Pearl Highlands is less developed than the areas in the Koko Head direction. Right-of-way can be obtained more quickly at the west end of the Project; therefore, overall project construction can begin earlier, resulting in lower total construction costs. Construction is planned to continue uninterrupted in the Koko Head direction from Pearl Highlands to Aloha Stadium, Kalihi, and finally to Ala Moana Center.

As portions of the Project are completed, each will be opened incrementally so that system benefits, even if limited during the initial phases, will be realized prior to completion of construction of the entire Project.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

DC #4227-C

RECEIVED
DEC 29 2008
PB AMERICAS, INC.
HONOLULU, HAWAII

from Ralph Rosenberg Court Reporters

Monday, December 8, 2008

Department of Transportation Services
City and County of Honolulu
650 South King Street, 3rd Floor
Honolulu, Hawaii 96813

Subject: **Relating to Honolulu Transit Corridor Project Environmental Impacts**

One of the most significant adverse impacts of the proposed archaic elevated steel-on-steel heavy rail system is the irreparable blight it will implant through the vital heart of the Downtown Honolulu Waterfront and beyond. This obtrusive blight will impact four protected historic sites along the proposed Waterfront route - specifically Aloha Tower, Irwin Park, the Dillingham Transportation Building, and Mother Waldron Park .

Because of the City's requirement for federal funding for the proposed elevated rail project, it must comply with Section 106 of the National Historic Preservation Act and Section 4(f) of the Department of Transportation Act. It will therefore be taken into account that such elevated infrastructure blight would be "visually incompatible and block the view of the historic resource (e.g., the scale of the infrastructure would overwhelm the resource's historic appearance)" and would cause the "loss of integrity of setting, feeling and association" of these historic sites. The historic view planes to the Harbor from Bishop Street and the Chinatown Historic District will be similarly impacted.

It would therefore be a fatal mistake for Honolulu's future if the City forces the intrusion of elevated transit blight on the Honolulu Waterfront and the *mauka-makai* harbor views. If the Downtown Honolulu Waterfront is allowed to be impacted by the fatal mistake of elevated guideway infrastructure, the vital visual, and indeed historic, character and integrity of the waterfront centerpiece of Downtown and its harbor entrance to Honolulu will be lost. One only needs to consider the blight created by the Embarcadero Freeway along the San Francisco Waterfront, and the universal public elation when it was torn down. It is time that the City and County of Honolulu learns by the mistakes of others before it is too late.

The City also proposes to slam the elevated heavy rail route through Kaka'ako adjacent to another registered historic site, Mother Waldron Park on Halekauwila Street, diminishing its historic character and integrity, and usefulness and attraction as a vital recreational open space for today's growing population. The Kaka`ako Mauka master plan designates Halekauwila Street and its extension to Kamake`e Street as a significant "promenade" street, a pedestrian-friendly boulevard with wide tree-lined sidewalks and new human-scale residential neighborhoods. Thus, the proposed elevated steel-on-steel heavy rail transit infrastructure blight slicing through these neighborhoods is also tragically misplaced.

In conclusion, there are very serious concerns surrounding the City's disregard and neglect of the significant adverse impacts of an elevated transit route along the Honolulu Waterfront specific to the complex of registered historic sites that include Aloha Tower, Irwin Park and the Dillingham Transportation Building, and Mother Waldron Park. This badly-planned project cannot be allowed to overshadow and overpower these significant historic sites or destroy the visual character and integrity of the vital Downtown Waterfront.

Sincerely,

Michelle Spalding Matson

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, 3RD FLOOR
HONOLULU, HAWAII 96813
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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

KENNETH TORU HAMAYASU
DEPUTY DIRECTOR

June 11, 2010

RT10/09-335799

Ms. Michelle Spalding Matson
3931 Gail Street
Honolulu, Hawaii 96815

Dear Ms. Matson:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

The island's unique visual character and scenic beauty were considered in the visual and aesthetic analysis presented in the Draft and Final EISs. The Project will be set in an urban context where visual change is expected and differences in scale of structures are typical. The visual effects on Honolulu's Downtown, including the Aloha Tower, Bishop Street, Chinatown Historic District, Irwin Park, and Dillingham Transportation Building, are discussed under the "Kalihi to Ala Moana Center Landscape Unit" heading in Section 4.8.3 of the Final EIS. The Project will comply with Section 106 of the National Historic Preservation Act and Section 4(f) of the Department of Transportation Act. Coordination with the regulatory agencies that are responsible for compliance is ongoing as documented in Section 4.16 and Chapter 5 of this Final EIS.

The Embarcadero Freeway in San Francisco was an elevated highway, not rail, and thus

is not directly comparable to this project.

In Section 4.8.3 of the Final EIS, specific environmental, architecture, and landscape design criteria are listed that will help minimize visual effects of the Project. The City will implement the following measures to minimize negative visual effects and enhance the visual and aesthetic opportunities that the Project creates:

- *Develop and apply design guidelines that will establish a consistent design framework for the Project with consideration of local context.*
- *Coordinate the project design with the City's transit-oriented development program within the Department of Planning and Permitting.*
- *Conduct public involvement workshops to consult with the communities surrounding each station for input on station design elements.*
- *Consider specific sites for landscaping and trees during Final Design when plans for new plantings will be prepared by a landscape architect. Landscape and streetscape improvements will serve to mitigate potential visual impacts.*

Even with mitigation measures, some obstruction and changes to views will result in a high level of visual impact, or, a significant visual impact, and changes to some views will be unavoidable. These effects will be most noticeable where the guideway and stations are nearby or in the foreground of views.

Some views and vistas protected by City development plans will change as a result of the project, including public views along streets and highways, mauka-makai view corridors, panoramic and significant landmark views from public places, views of natural features, heritage resources and other landmarks. Depending on the degree of view obstruction or blockage, some changes in view will be significant. Viewers' response to these changes will vary with their exposure and sensitivity and depend on the alignment orientation, guideway and station height, and height of surrounding trees and buildings. View changes will be less notable in wider vista or panoramic views where the project elements are smaller components of the larger landscape. Generally, the project elements will not be dominant features in these views.

The visual effects on Irwin Park are not specifically mentioned in Table 4-10 of the Draft EIS. However, they are part of the larger views assessed in Viewpoint 15 in the Final EIS. The text on Page 4-88 of the Draft EIS has been refined in the Final EIS to clarify the visual impact analysis presented in the Draft EIS as described above.

Although mitigation measures will minimize many adverse visual effects by providing visual buffers and reducing visual contrasts between the project elements and their surroundings, the Final EIS acknowledges, as concluded in the Draft EIS, that probable unavoidable adverse effects, such as view blockage, cannot be mitigated and will be significant (noted as a "High" level of visual impact in the Draft EIS) in some areas.

The Project will introduce a new linear visual element to the corridor, and changes to some views will be significant (or, a high level of visual impact) and unavoidable. The guideway

and some stations will partially block mauka-makai public views from streets that intersect the alignment.

Preliminary effect determinations for DOT Harbors Division Offices, Piers 10/11, Aloha Tower, Irwin Park, Dillingham Transportation Building, Chinatown Historic District, and Mother Waldron Neighborhood Playground documented in the Draft EIS were reevaluated in the Honolulu High-Capacity Transit Corridor Project Historic Effects Report (RTD 2009) issued by FTA on April 14, 2009. Analysis of the Project's direct, indirect, and cumulative impacts to these properties, as described in the Historic Effects Report, include effects to setting. Consultation with the State Historic Preservation Office (SHPO) has continued since release of the Draft EIS. This Final EIS summarizes all effect determinations to historic properties and Section 106 consultation as described in text and tables of Section 4.16 and Chapter 5.

The visual effects on Honolulu's Downtown, including Mother Waldron Neighborhood Park and the Kakaako neighborhood, are discussed under the "Kalihi to Ala Moana Center Landscape Unit" in Section 4.8.3 of the Final EIS. To minimize negative visual effects and enhance visual and aesthetic opportunities, the City will consult with the Kakaako community for input on station design elements. In addition, design guidelines that establish a consistent design framework for the Project with consideration of local context will be developed and applied.

As described in Section 4.2, Land Use in this Final EIS, Appendix J, and expanded upon in the Honolulu High-Capacity Transit Corridor Project Land Use Technical Report (RTD 2008b), the Project is consistent with State and local plans.

Within the Kakaako area, land uses adjacent to the alignment include two- and three-story walk-up apartments and commercial uses. Because Kakaako has been designated a redevelopment area, Kaiāulu 'o Kaka'ako Master Plan (HCDA 2008), changes in land uses to transit-oriented development are likely. This may result in a change in character along the alignment, especially near stations depending on local community input and what redevelopment plans administer. Substantial development has recently occurred in the neighborhood; several high-rise condominium developments have been built and additional residential and commercial development is planned. The elevated transit structure will not create a barrier to pedestrian or other modes of travel.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

MICHELLE SPALDING MATSON
3931 Gail Street
Honolulu, Hawaii 96815

February 3, 2009

Department of Transportation Services
City and County of Honolulu
650 South King Street, 3rd Floor
Honolulu, Hawaii 96813

Attention: Wayne Y. Yoshioka, Director

Subject: Honolulu High-Capacity Transit Corridor Project
Draft Environmental Impact Statement

Dear Sir:

The following comments center on the significance of the Honolulu Waterfront as a historic complex, which is greatly understated and poorly depicted in the subject Draft EIS. The callous insensitivity and abandonment of sound planning and preservation practices demonstrated by the promoters of the proposed project destined to blight this historic complex, across which the subject elevated industrial infrastructure is proposed to span, is appalling.

The Honolulu Waterfront is representative of Honolulu's history from the days of Kamehameha's strategic harbor village, to a Pacific port that welcomed visitors by clipper ship and exported sugar cane across the seas, to today's destination for cruise ships and container cargo essential to the State's sustainability. The permanent visual damage to the appearance and experience of this historic area caused by the proposed industrial infrastructure will be irreparable.

Aloha Tower has long been a beacon that has welcomed travelers to Honolulu. Irwin Memorial Park was Honolulu's first beautification project as the landscaped companion to Aloha Tower, and both landmarks are listed on the Hawaii Register of Historic Places. Together they were, and remain, the landscaped gateway to Honolulu for thousands of residents and visitors alike.

As a family descendent of those who deeded Irwin Memorial Park in trust to the Territory of Hawaii, and writer of the nomination of this site for the Historic Register, I have a vested interest in the protection and preservation of this historic open space held in the public trust. Irwin Memorial Park was indeed a landscaped centerpiece park as intended by the donors until the federal government converted a portion of it into a World War II military parking lot. Since that time plans have been commissioned for the Park's restoration, which has been part of ongoing planning discussions with the State's Aloha Tower Development Corporation.

AR00002495

**HONOLULU WATERFRONT'S FOUR REGISTERED HISTORIC SITES:
ALOHA TOWER AND RESTORED IRWIN PARK WITH THE HARBOR AND PASSENGER TERMIINAL BEYOND
AS VIEWED FROM THE DILLINGHAM TRANSPORTATION BUILDING ON BISHOP STREET**

IRREVERSIBLE AND IRRETRIEVABLE COMMITMENTS OF VALUED PUBLIC RESOURCES

One of the most significant adverse impacts of the proposed elevated steel-on-steel heavy rail system is the irreparable blight it will implant through the vital heart of the Downtown Honolulu Waterfront and beyond. This obtrusive blight will impact five protected registered historic sites along the proposed Waterfront route – specifically the Piers 10 and 11 Maritime Passenger Terminal, Aloha Tower, Irwin Park, the Dillingham Transportation Building, and Mother Waldron Park beyond.

Because of the City's requirement for federal funding for the proposed elevated rail project, there must be compliance with Section 106 of the National Historic Preservation Act and Section 4(f) of the Department of Transportation Act. It will therefore be taken into account that such elevated infrastructure slicing across the historic waterfront will substantially visually impair and block the views of these historic resources, i.e., the scale of the infrastructure would overwhelm the appearance of the adjacent historic resources and would cause the loss of integrity of setting, feeling and association of these historic sites and their scenic quality, scale and prominence within the visual environment of this significant location. The historic public view corridors to Honolulu Harbor from Bishop Street, Fort Street, and the Chinatown historic district will be similarly substantially impaired.

AR00002496

The Draft EIS clearly inaccurately accounts for these significant cumulative adverse effects and fails to adequately evaluate the effects of the proposed project on the view corridor. According to the Code of Federal Regulations, 36 CFR Part 800, significant effect is defined as "alteration of the characteristics of a historic property qualifying it for inclusion or eligibility for the National Register," and adverse effect is constituted as, among other things, "introduction of visual, atmospheric, or audible elements that diminish the integrity of the property's significant historic feature."

The Draft EIS states on page 2-37 that Irwin Memorial Park "does not derive a substantial part of its value from its visual setting" and "the project would not substantially impair aesthetic features that are important contributing elements of the property." The Draft EIS overlooks the visual significance of Irwin Memorial Park's landscaped open space together with three other registered historic structures within the uninterrupted view plane. Visually sensitive resources include landmarks, significant views and vistas, view corridors, and historic sites. Because of the proximity and placement of these historic sites it is the views within this historic complex associated with the sites, i.e., to, from and around them, that are significant. A flat roadbed does not adversely impact view planes, corridors or sight lines as they relate to the historic site, but massive rail infrastructure built to thirty (30) feet in height with "visual, atmospheric, and audible elements" would have adverse effects "that diminish the integrity of the property's significant historic feature," and would thus appear to qualify the historic site for protection under Section 4(f).

The visual effects of the proposed project are listed on Table 4-10, and the visual quality of Irwin Park and Aloha Tower is acknowledged to be high. However, the Draft EIS curiously claims that the adverse visual effect of the proposed project on the visual integrity of Irwin Park and Aloha Tower will be "moderate" and "low" when in reality the overall visual effects in this area would be significantly high. Further, the Draft EIS provides a degree of self-contradiction by acknowledging on page 4-88 that "the guideway and columns would change the visual character of the streetscape and substantially affect the visual setting of the Dillingham Transportation Building and Irwin Park. Overall visual effects in this area would be high." Moreover, the Draft EIS flies in the face of moral logic and public policy by blindly declaring on page 4-44 that "The transit system would have little effect on the integrity of the historic districts or their uses," and thus falls flat in assessing the affected visual environment's character and quality.

Further, in both text and depiction the Draft DEIS ignores the high visual quality of this historic complex as approached ewa-bound from the Diamond Head direction, makai from Bishop Street and the historic Dillingham Transportation Building, and makai from Fort

Street and historic Walker Park to Aloha Tower. These more prominent view planes are superior to the alternate perspectives apparently arbitrarily chosen for the Draft EIS, and if superimposed with the elevated rail infrastructure these views would demonstrate the true significant adverse visual effects of the proposed elevated rail infrastructure proposed to span the Honolulu Waterfront from Chinatown to the Federal Building.

The proposed project's cumulative adverse visual and aesthetic impacts to the Honolulu Waterfront and its historic sites would conflict with established policy documents, specifically the Oahu General Plan (Objective B, Policies 2 and 3; Objective E, Policies 4,5 and 9), the Primary Urban Center Development Plan (Objective 3.1.2 and Policy 3.1.2) and the Revised Ordinances of Honolulu (Chapter 21, Article 9, Section 21-9.60), as follows:

- Substantially visually changing and contextually impacting the entire Downtown Honolulu Waterfront area, which is both a historic and scenic asset.
- Positioning elevated infrastructure adjacent to and/or in the foreground of existing historic sites and views
- Altering existing makai views and mauka view corridors
- Introducing dominant features in the views, i.e., elevated infrastructure and expansive station elements
- Substantially contrasting with the pedestrian scale and character of the streetscape
- Substantially affecting the aesthetic setting of the historic sites

Thus the elevated infrastructure and stations will irretrievably alter the significant views and sense of historic place of the Honolulu Waterfront. The visual impact of overpowering industrial infrastructure will ruin the waterfront experience for residents and visitors alike for generations to come, including motorists traveling along the waterfront and pedestrians crossing the roadway under the overshadowing monolithic infrastructure. Many major viewer groups who now enjoy the attractive surroundings and experience of the Downtown Honolulu Waterfront will be sensitive to the visual change and will be adversely affected by the altered views and substantial changes in light and shadows around the massive elevated infrastructure.

It would therefore be a fatal mistake for Honolulu's future if the City forces intrusion of elevated transit blight on the Honolulu Waterfront and its historic mauka-makai harbor views. As a consequence, the vital visual historic character and integrity of the waterfront centerpiece of Downtown Honolulu and its Harbor will be lost. One only needs to consider the blight of the Embarcadero Freeway along the San Francisco Waterfront, and the universal public elation when it was torn down. It is time that the City and County of Honolulu learns by the mistakes of others and does not continue to blunder forward.

Because of the high adverse impact to the visual quality of the Honolulu Waterfront, blocking views and clashing with historic buildings and open space in terms of size, scale and character, the Downtown Waterfront transit corridor route must be rerouted via available alternatives. The Draft EIS provides several Avoidance Alternative Alignments to minimize harm and ensure protection of valued features and sites along the transit route, and the Honolulu Waterfront is more than worthy of this consideration, action and protection. In addition, on January 28, 2009, the Honolulu City Council, as the elected policy-making body for the City and County of Honolulu, approved rerouting a major segment of the proposed rail corridor. If this cannot or will not be done for the Downtown segment, and because it will be impossible to mitigate the unyielding mass of the industrial elevated design framework to preserve significant visual resources, the proposed elevated rail system should be terminated in Iwilei with connection to a dedicated, flexible and convenient grade level Downtown circulator system serving the entire area.

The Draft EIS claims on page 4-44 that as the elevated rail alignment transitions from the Honolulu Waterfront to Halekauwila Street, a narrow local tree-lined road dating from the 1800's, there are "highrise buildings with little or no space between them" and "tall trees already obstruct views." In fact, the public buildings at this Civic Center end of Halekauwila Street, while not much taller than the train would be, are surrounded by mature healthy shade tree canopies and wide setbacks, which are in themselves are welcome comforts within the public visual experience of this district. Again, the visual integrity of this area would be hideously overshadowed, bisected and deformed by the massive industrial elevated rail infrastructure. Indeed, the Draft EIS states on page 4-88 that the "overall visual effects in this area would be high."

The Draft EIS also proposes to carve the elevated heavy rail route through Kaka'ako immediately adjacent to the next historic site, Mother Waldron Park on Halekauwila Street, diminishing its historic character and integrity, and usefulness and attraction as a vital recreational open space for today's growing population. The Draft EIS states on page 4-89 that the proposed project "would substantially change views and contrast with the scale and character of the surrounding environment. Overall visual effects would be high.... Views of the horizon would be partially blocked... including mauka views from the park at Halekauwila Street and Cooke Street. The bulk and scale of the guideway and columns would conflict with the pedestrian-oriented streetscape."

Further, the revised Kaka'ako Mauka master plan designated Halekauwila Street and its extension to Kamake'e Street as a significant "promenade street," a pedestrian-friendly boulevard with wide tree-lined sidewalks and new low-rise residential neighborhoods. Thus

AR00002499

the proposed elevated steel-on-steel heavy rail transit infrastructure blight bisecting these planned Kaka'ako neighborhoods is also tragically misplaced.

There has been little, if any, consideration of the local context in this train proposal for Downtown Honolulu, or from Kaka'ako to the gateway of Manoa's green valley, as it has been railroaded though an uninformed planning process. Hundreds of mature trees that have been protected and preserved for decades are destined to be destroyed or otherwise removed in direct conflict with the Oahu General Plan (Objective A, Policy 9) and the Revised Ordinances of Honolulu (Chapter 41, Article 13). The Draft EIS discloses on page 4-89 that "Mature trees would be removed from Pi'ikoi Street through the Ala Moana Center Station area, substantially changing the character of the streetscape."

The condition and appearance of Honolulu's streets and public open spaces are important factors in, and essential attributes to, the visual character and quality for which Honolulu is known. Significant views and vistas in policy documents include protected mauka and makai views as well as views of prominent landmarks, and the environmental visual character and quality must be fully assessed along with any potential physical impacts.

In conclusion, it has become abundantly clear that the presently proposed elevated transit project is, in some significant aspects, contrary to the public interest. Very serious public concerns surround the City's disregard and neglect of the significant adverse impacts of the proposed elevated rail infrastructure. Specific to the complex of registered sites that include the Piers 10 and 11 Maritime Passenger Terminal, Aloha Tower, Irwin Park and the Dillingham Transportation Building, along with Mother Waldron Park, this badly-planned project cannot, and must not, be allowed to proceed further to overshadow and overpower these significant historic sites and destroy the visual character and integrity of the Downtown Honolulu Waterfront.

Sincerely,

MichelleS.Matson

Michelle Spalding Matson

AR00002500

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
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DIRECTOR

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KENNETH TORU HAMAYASU
DEPUTY DIRECTOR

June 11, 2010

RT10/09-338275

Ms. Michelle Spalding Matson
3931 Gail Street
Honolulu, Hawaii 96815

Dear Ms. Matson:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

The island's unique visual character and scenic beauty were considered in the visual and aesthetic analysis presented in the Final EIS. The Project primarily will be set in an urban context where visual change is expected and differences in scales of structures are typical. The visual effects on Honolulu's Downtown, including the Aloha Tower, Irwin Park, Dillingham Transportation Building, Mother Waldron Neighborhood Park, Bishop Street, Chinatown Historic District, and the Kakaako neighborhood are discussed under the "Kalihi to Ala Moana Center Landscape Unit" heading, discussed in Section 4.8.3 in this Final EIS. The City and FTA have complied with Section 106 of the National Historic Preservation Act and Section 4(f) of the Department of Transportation Act as presented in this Final EIS, Section 4.16 and Chapter 5.

Inclusion of the viewer group's responses, received during the Draft EIS comment period, resulted in refinement of the visual impact rating for three key views. The refinement

resulted in revised ratings from moderate to significant for Views 12, 14 and 15 in the downtown area. In addition, the discussion of protected views and vistas provided in this Final EIS includes new summary tables and new visual simulations that were not part of the Draft EIS. The analysis of protected views and vistas was provided in the Visual and Aesthetic Resources Technical Report (2008e); however, this Final EIS more clearly describes the visual effects on these resources.

The Embarcadero Freeway in San Francisco was an elevated highway, not rail, and thus is not directly comparable to this project.

The overall conclusions of the Draft EIS have not changed, but through these refinements, the following clarifications have been made:

- *Viewpoint 12. Visual impact rating refined to reflect that some views would be blocked and to expressly point out the contrast of project elements with Chinatown's historic character.*

- *Viewpoint 14. Visual impact rating refined to reflect the bulk and scale of the guideway and columns being out of character with the pedestrian-oriented environment at this viewpoint.*

- *Viewpoint 15: Visual impact rating refined to reflect the bulk and scale of the station as well as the other elements noted in the Draft EIS.*

The Draft EIS described several types of visual effects and the refinements reflect the same type of visual effects identified in the Draft EIS and shown in these Viewpoints in the Draft EIS. The Draft EIS concluded that changes to some views including protected views and vistas would be unavoidable, and the refinements confirmed this conclusion.

Although mitigation measures will minimize many adverse visual effects by providing visual buffers and reducing visual contrasts between the project elements and their surroundings, the Final EIS acknowledges, as concluded in the Draft EIS, that probable unavoidable adverse effects, such as view blockage, cannot be mitigated and will be significant (noted as a "High" level of visual impact in the Draft EIS) in some areas.

The Project will introduce a new linear visual element to the corridor, and changes to some views will be significant (or, a high level of visual impact) and unavoidable. The guideway and some stations will partially block mauka-makai public views from streets that intersect the alignment.

The City will implement the following mitigation framework (as further described in Section 4.8.3 in this Final EIS) with the Project to minimize negative visual effects and enhance the visual and aesthetic opportunities that it creates:

- *Develop and apply design guidelines that will establish a consistent design framework for the Project with consideration of local context.*

- *Coordinate the project design with the City's TOD program within the Department of Planning and Permitting.*

- *Conduct public involvement workshops to consult with the communities surrounding each station for input on station design elements.*

- *Consider specific sites for landscaping and trees during the final design phase when plans for new plantings will be prepared by a landscape architect. Landscape and streetscape improvements will serve to mitigate potential visual impacts.*

Even with mitigation measures, some obstruction and changes to views will result in a high level of visual impact, or, a significant impact, and changes to some views will be unavoidable. These effects will be most noticeable where the guideway and stations are nearby or in the foreground of views.

Some views and vistas protected by City development plans will change as a result of the Project, including public views along streets and highways, mauka-makai view corridors, panoramic and significant landmark views from public places, views of natural features, heritage resources and other landmarks. Depending on the degree of view obstruction or blockage, some changes in view will be significant. Viewers' response to these changes will vary with their exposure and sensitivity and depend on the alignment orientation, guideway and station height, and height of surrounding trees and buildings. View changes will be less notable in wider vista or panoramic views where the project elements are smaller components of the larger landscape. Generally, the project elements will not be dominant features in these views.

The visual effects on Honolulu's Downtown, including Mother Waldron Neighborhood Park and the Kakaako neighborhood are discussed under the "Kalihi to Ala Moana Center Landscape Unit" heading in Section 4.8.3 of the Final EIS. To minimize adverse visual effects and enhance visual and aesthetic opportunities, the City will consult with the Kakaako community for input on station design elements. Specifically, the Kakaako Station workshop will be held in conjunction with the Civic Center and Ala Moana Stations. In addition, design guidelines that establish a consistent design framework for the Project with consideration of local context will be developed and applied.

The visual effects on Irwin Park are not specifically mentioned in Table 4-10 of the Draft EIS. However, they are part of the larger views assessed in Viewpoint 15 in the Final EIS. The text on Page 4-88 of the Draft EIS has been refined in the Final EIS to clarify the visual impact analysis presented in the Draft EIS as described above.

Preliminary effect determinations for DOT Harbors Division Offices, Piers 10/11 (Maritime Passenger Terminal), Aloha Tower, Irwin Park, Dillingham Transportation Building, Chinatown Historic District, and Mother Waldron Neighborhood Playground documented in the Draft EIS were reevaluated in the Honolulu High-Capacity Transit Corridor Project Historic Effects Report (RTD 2009) issued by FTA on April 14, 2009. Analysis of the Project's direct, indirect, and cumulative impacts to these properties, as described in the Historic Effects Report, include effects to setting. Consultation with the SHPO has continued since release of the Draft

EIS. This Final EIS summarizes all effect determinations to historic properties and Section 106 consultation as described in text and tables of Section 4.16 and in Chapter 5 of the Final EIS.

As described in Section 4.2, Appendix J, and expanded upon in the Honolulu High-Capacity Transit Corridor Project Land Use Technical Report (RTD 2008b), the Project is consistent with State and local plans.

The specific wording in the Draft EIS on Pages 4-44 and 4-45 states that "As the alignment transitions to Halekauwila Street, a relatively narrow street, the adjacent buildings become primarily high-rise government office buildings with little or no open space between them. Views of the alignment would be limited to short segments as the guideway crosses city streets since high-rise buildings and tall trees already obstruct views." It is acknowledged that tree canopies and building setbacks enhance the public's visual experience of the area and as explained on Page 4-88 of the Draft EIS, canopies of several mature monkeypod trees along Halekauwila Street would be trimmed. The guideway and columns would also block views from the fourth- and fifth-story windows of adjacent offices and residences, creating additional shade and shadows, and "...the overall visual effects in this area would be high."

Section 4.13.3 of the Draft EIS states that, "effects to trees would be mitigated by transplanting existing trees or planting new ones." Additional information on street trees is offered in the Honolulu High-Capacity Transit Corridor Project Street Trees Technical Report (RTD 2008l). Street trees along the project alignment are discussed in Section 4.15 of the Final EIS. Affects to street trees will be mitigated by transplanting existing trees where possible, or planting new ones. Other possible mitigation measures are discussed in Section 4.15.3 in the Final EIS.

Within the Kakaako area, land uses adjacent to the alignment include two- and three-story walk-up apartments and commercial uses. Because Kakaako has been designated a redevelopment area, Kaiāulu 'o Kaka'ako Master Plan (HCDA 2008), changes in land uses to transit-oriented development are likely. This may result in a change in character along the alignment, especially near stations depending on local community input and what redevelopment plans administer. Substantial development has recently occurred in the neighborhood; several high-rise condominium developments have been built and additional residential and commercial development is planned. The elevated transit structure will not create a barrier to pedestrian, cyclist or automobile modes of travel.

Regarding your comment about public concerns specific to historic sites the following text from Section 8.2.3 of the Final EIS explains the process and the efforts taken both prior to the Draft document and since its publication. The lead agency is responsible for complying with Section 106 of the National Historic Preservation Act. Section 106 requires the lead agency to "accommodate historic preservation concerns with the needs of Federal undertakings through consultation among the agency official and other parties with an interest in the effects of the undertaking on historic properties..." [36 CFR 800.1(a)]. Although other parties are consulted for their input, the Federal agency has the authority to make all decisions. Extensive effort was made to identify, contact, and consult with groups entitled to be consulting parties relating to archaeological, cultural, and historic resources within the Area of Potential Effect (APE). The purpose of consultation was to identify archaeological, cultural, and historic resources and to

discuss other issues relating to the Project's potential effects on such resources. Information was obtained from individuals and organizations likely to have knowledge of potential resources in the study corridor. A reasonable and good faith effort was made to identify Native Hawaiian organizations that might attach religious and cultural significance to historic properties in the APE, and they were given opportunities to discuss issues and concerns.

In addition to consultation with the State Historic Preservation Officer (SHPO), the City also consulted with organizations and agencies with concerns regarding archaeological, cultural, and historic areas. This consultation included Hawaiian civic clubs that may have an interest in the Project. Letters sent by the FTA initiated an ongoing consultation process with the following groups (Section 106 consulting parties) to identify resources, consider project effects, and develop mitigation to limit the adverse effects of the Project:

- *Advisory Council on Historic Preservation*
- *U.S. Navy (U.S. Naval Base Pearl Harbor)*
- *Historic Hawaii Foundation*
- *National Park Service*
- *National Trust for Historic Preservation*
- *University of Hawaii Historic Preservation Certificate Program*
- *American Institute of Architects*
- *Hawai'i Community Development Authority*
- *Office of Hawaiian Affairs*
- *Oahu Island Burial Council*
- *Hui Malama I Na Kupuna O Hawaii Nei*
- *Royal Order of Kamehameha*
- *The Ahahui Ka'ahumanu*
- *The Hale O Na Ali'i O Hawaii*
- *The Daughters and Sons of Hawaiian Warriors*
- *Association of Hawaiian Civic Clubs—and 15 individual civic clubs*

Between July 28, 2009 and November 13, 2009, FTA and the City invited all consulting parties to participate in a series of meetings to develop the Programmatic Agreement (PA) (see Section 4.16 and Appendix H). Appendix F includes copies of all Section 106 correspondence.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
Creation Date :	12/25/2008
Creator Affiliation :	
First Name :	Tad
Last Name :	Matsuno
Business/Organization :	
Address :	
Alternative Preference :	
Apt./Suite No. :	
City :	
State :	HI
Zip Code :	96816
Email :	krankedparts@aol.com
Telephone :	
Telephone Extension :	
Add to Mailing List :	Email
Submission Method :	Website
Other Submission Method :	
Submission Date :	12/25/2008
Submission Content/Notes :	Just a comment that I think the extension to UH is a great idea. A necessary one that will help with minimizing traffic. I notice the traffic difference when UH is not in session as traffic time during morning rush hour is cut. I have been watching the traffic differences between private school sessions and UH and it appears that those commuting to UH are a big factor in traffic. I also think students would opt more to commuting via the rail system than other traffic groups. Thanks.

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, 3RD FLOOR
HONOLULU, HAWAII 96813
Phone: (808) 768-8305 • Fax: (808) 768-4730 • Internet: www.honolulu.gov

MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010 RT9/09-332254

Mr. Tad Matsuno
krankedparts@aol.com

Dear Mr. Matsuno:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraph addresses your comments regarding the above-referenced submittal:

Your support of the future UH Manoa extension has been noted. The Project has logical termini at East Kapolei and Ala Moana Center and independent utility from any extensions that may be constructed in the future. The future extensions to West Kapolei, Salt Lake Boulevard, Waikiki, and UH Manoa are discussed in the cumulative impacts sections of Chapters 3 and 4 of the Final EIS; however the future extensions are not part of this Project, thus they are not required to be evaluated under Chapter 343 of the Hawaii Revised Statutes and NEPA. Under NEPA, environmental analysis is only required when there is a proposed action by a Federal agency. Here, because the future extensions are not proposed for implementation at this time, they are not part of the Project studied in the Final EIS. It would be premature to undertake an environmental analysis of the extensions (beyond the cumulative impacts analysis) because they are not part of the proposed action to be taken by the City and FTA. If the future extensions are proposed for implementation in the future, environmental analysis of the extensions and appropriate alternatives will be undertaken at that time. As stated in Chapter 3

of the Final EIS, transit ridership would be 28 percent higher with the planned extensions to UH Manoa, Waikiki, Salt Lake Boulevard, and West Kapolei (Table 3-29 in the Final EIS). The extensions would also further reduce roadway congestion (Table 3-30). Bus service between Ala Moana Center, UH Manoa, and Waikiki will be enhanced until those extensions are built.

The FTA and DTS appreciate your interest in the Project. The Final EIS has been issued in conjunction with the distribution of this letter. You may view the Final EIS on the Project website at www.honolulutransit.org. You may request a DVD of the Final EIS and additional content through the "Contact Us" tab on the website or by calling the Project hotline at 566-2299. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

From: dan matthews [mailto:dmatthews@consultant.com]
Sent: Friday, February 06, 2009 10:47 AM
To: Yoshioka, Wayne; Ted.Matley@dot.gov
Subject: Draft EIS for the Honolulu High-Capacity Transit Project

Please accept my feelings about the subject EIS.

I disagree with the wording of the EIS because it is written solely for a steel wheel on steel rail system. Other forms of fixed rail should be considered because they may be superior to steel wheels and more cost effective. Please rewrite the EIS to include other forms of mass transit such as monorail or magnetic levitation systems. This should insure the selection of the overall best system.

Thank you for your consideration.

Dan C. Matthews, Lt Col, USAF, Retired
Pearl City, Hawaii

--
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DEPARTMENT OF TRANSPORTATION SERVICES

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010 RT2/09-299048R

Mr. Dan C. Matthews
dmatthews@consultant.com

Dear Mr. Matthews:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

As stated in Section 2.2.3 of this Final EIS, the NEPA Notice of Intent requested input on five transit technologies. A technical review process included the opportunity for public comment and was used in parallel with the alternatives analysis to select a transit technology. The process included a broad request for information that was publicized to the transit industry. Transit vehicle manufacturers submitted 12 responses covering all of the technologies listed in the Notice of Intent. An independent five-member technology panel composed of four transit experts and a transportation academic appointed by the City Council evaluated guided rubber-tire-on-concrete systems (e.g., Phileas bus system and VAL-type systems), monorail (which is a variation on rubber-tyred technology), steel-wheel-on-steel-rail systems, (e.g., light rail and rapid rail), and magnetic levitation (MAGLEV) . The panel considered the performance, cost, and reliability of the proposed technologies.

Proprietary technologies, meaning those technologies that would have required all future

purchases of vehicles or equipment to be from a single manufacturer, were eliminated because none of the proprietary technologies offered substantial proven performance, cost, and reliability benefits compared to steel wheel operating on steel rail.

The panel accepted public comment twice as part of its review. By a four-to-one vote, the panel chose a steel wheel vehicle operating on steel rail system because it was considered safe, reliable, economical, and non-proprietary. Those results are documented in the panel's report to the City Council dated February 22, 2008 entitled "Independent Technology Selection Panel Report".

The FTA and DTS appreciate your interest in the Project. The Final EIS has been issued in conjunction with the distribution of this letter. You may view the Final EIS on the Project website at www.honolulutransit.org. You may request a DVD of the Final EIS and additional content through the "Contact Us" tab on the website or by calling the Project hotline at 566-2299. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Status :	Initial Action Needed
Creation Date :	1/7/2009
Creator Affiliation :	
First Name :	Pepe
Last Name :	Maulupe
Business/Organization :	Good Samaritan Church
Address :	P.O Box 31029
Alternative Preference :	
Apt./Suite No. :	
City :	Honolulu
State :	HI
Zip Code :	96820
Email :	
Telephone :	
Telephone Extension :	
Add to Mailing List :	Standard
Submission Method :	Website
Other Submission Method :	
Submission Date :	01/07/2009
Submission Content/Notes :	stop the commotion & begin the project

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-333531

Ms. Pepe Maulupe
P.O. Box 31029
Honolulu, Hawaii 96820

Dear Ms. Maulupe:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraph addresses your comments regarding the above-referenced submittal:

While each of the alternatives discussed in the Draft EIS includes trade-offs between benefits and impacts, the Airport Alternative from East Kapolei to Ala Moana has been selected as the Preferred Alternative as described above. As compared to the alternatives discussed in the Draft EIS, the Airport Alternative will carry the most passengers, provide the greatest transit-user benefits, and result in the fewest vehicle hours of delay. It will provide access to employment centers at Pearl Harbor Naval Base and Honolulu International Airport and will serve the Salt Lake neighborhood with connecting bus service. Of the three Build Alternatives addressed in the Draft EIS, the Airport Alternative will have slightly less impacts to the natural and built environment analyzed in the Draft EIS. During the public comment period on the Draft EIS, the public overwhelmingly supported the Airport Alternative. Of the comments that specifically supported one of the alternatives, more than 75 percent were in support of the

Airport Alternative. For more information this selection is discussed in Section 2.4 of the Final EIS. Since publication of the Draft EIS, design has been advanced, further analysis has been completed, and information has been added in response to comments on the Draft EIS and agency coordination. The Final EIS discusses the process that was used to select the Preferred Alternative, how comments were considered in the decision-making process, impacts and mitigation commitments. The Project is proceeding as quickly as practical, as illustrated in the schedule presented in Chapter 2 of the Final EIS.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

cc: Interested Parties

RT 12/08-292454

425 Ena Rd Apt 305A
Honolulu, Hi 96815

OTS
RAPID TRANSIT

'08 DEC 22 A10:16

Dec. 11, 2008

Department of Transportation
650 S. King St. 3rd floor
Honolulu, Hi 96813

Dear Department Members:

My husband & I have lived in Hawaii for more than 22 years.

As former New York residents who were born & raised in the city we know all too well about the problems with your proposed elevated system.

They are noisy, dirty, very polluting and would further destroy the beauty that was once present on our island.

The property on 3rd Avenue in N.Y.C. did not appreciate in value until the structure was torn down.

We would like to add that all trains in N.Y. have policemen & transit employees at all times. They could be & would be unsafe & no one would ride them without such personnel. Stop this train & think our traffic woes. There are other solutions -

Madeleine & Irwin Mayer

DEPARTMENT OF TRANSPORTATION SERVICES

MUFI HANNEMANN
MAYOR

CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, 3RD FLOOR
HONOLULU, HAWAII 96813
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WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT10/09-336253

Mr. Irwin Mayer
Ms. Michelina Mayer
425 Ena Road
Apartment 305A
Honolulu, Hawaii 96815

Dear Mr. and Ms. Mayer:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

The assessment of visual effect due to the Project as described in Section 4.8.3 of the Final EIS considers changes to the visual landscape and viewer responses to those changes. This includes the existing development along the Project alignment. Within the Project corridor the environment changes from rural at the Wai'anae end of the corridor to dense high-rise development at the Koko Head end.

As part of the design process, the City has developed design principles, which are identified in the Honolulu High-Capacity Transit Corridor Project Compendium of Design Criteria (RTD 2009m) that will be implemented in final design to minimize visual effects of the Project. For example, guideway materials and surface textures will be selected in accordance with generally accepted architectural principles to achieve

effective integration between the guideway and its surrounding environment. Landscape and streetscape improvements will mitigate potential visual impacts, primarily for street-level views.

Other measures to address visual impacts of the Project are being developed through the station design and planning process. The initial station area plans and design guidelines were first developed with coordination between DTS and the Department of Planning and Permitting (DPP). The next level of transit station design focuses on integrating individual neighborhood characteristics of the communities served by the stations.

The following mitigation framework will be included in the Project to minimize negative visual effects and enhance the visual and aesthetic opportunities that it creates:

- *Develop and apply design guidelines that will establish a consistent design framework for the Project with consideration of local context.*
- *Coordinate the project design with City TOD planning and DPP.*
- *Consult with the communities surrounding each station for input on station design elements.*
- *Consider specific sites for landscaping and trees during the final design phase when plans for new plantings will be prepared by a landscape architect. Landscape and streetscape improvements will serve to mitigate potential visual impacts.*

Section 4.8.3 of the Final EIS, Design Principles and Mitigation includes information related to the mitigation framework described above. Specifically architecture and landscape design criteria include guidelines regarding site design, materials and finishes, and lighting, which apply to stations, station areas, and the guideway.

DTS, with assistance from the Honolulu Police Department, is developing a security plan for transit facilities, including park-and-ride lots. As discussed in Section 2.5.4 of the Final EIS, all stations, park-and-ride facilities, and vehicles will include security cameras that are monitored at all times of operation, will have audible and visual messaging systems, and have an intercom link to the system operations center. Security personnel will also patrol the system. Interior and safety lighting will be provided at all stations and park-and-ride facilities. The technology used for the Honolulu system has advanced substantially since development of elevated rail lines in New York and other mainland cities.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
Creation Date :	12/6/2008
Creator Affiliation :	
First Name :	Robert
Last Name :	McHenry
Business/Organization :	
Address :	1510 Bertram St.
Alternative Preference :	
Apt./Suite No. :	
City :	Honolulu
State :	HI
Zip Code :	96816
Email :	mchenry@hawaii.edu
Telephone :	
Telephone Extension :	
Add to Mailing List :	Email
Submission Method :	Website
Other Submission Method :	
Submission Date :	12/06/2008
Submission Content/Notes :	I strongly support the city's rail plan as essential to the future of Honolulu. It is long overdue, and the importance of including the airport in the plans cannot ba overstated. Plenty of residents will use the service when it is available, not just visitors. If this is to remain a liveable city, we must provide mass transit, as all major urban centers I've visited have done.

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June , 2010

RT9/09-331299

Mr. Robert McHenry
1510 Bertram Street
Honolulu, Hawaii 96816

Dear Mr. McHenry:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall indentify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraph addresses your comments regarding the above-referenced submittal:

Your preference for the Airport Alternative has been noted. While each of the alternatives discussed in the Draft EIS includes trade-offs between benefits and impacts, the Airport Alternative from East Kapolei to Ala Moana has been selected as the Preferred Alternative as described above. As compared to the alternatives discussed in the Draft EIS, the Airport Alternative will carry the most passengers, provide the greatest transit-user benefits, and result in the fewest vehicle hours of delay. It will provide access to employment centers at Pearl Harbor Naval Base and Honolulu International Airport and will serve the Salt Lake neighborhood with connecting bus service. Of the three Build Alternatives addressed in the Draft EIS, the Airport Alternative will have slightly less impacts to the natural and built environment analyzed in the Draft EIS. During the public comment period on the Draft EIS, the public overwhelmingly supported the Airport Alternative. Of the comments that specifically supported one of the

alternatives, more than 75 percent were in support of the Airport Alternative. For more information this selection is discussed in Section 2.4 of the Final EIS. Since publication of the Draft EIS, design has been advanced, further analysis has been completed, and information has been added in response to comments on the Draft EIS and agency coordination. The Final EIS discusses the process that was used to select the Preferred Alternative, how comments were considered in the decision-making process, impacts and mitigation commitments.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

RECEIVED
FEB 6 P12:32
DIRECTOR'S OFFICE
TRANSPORTATION SERVICES

Feb. 5, 2009

Jay McWilliams
1499 Alencastre St.
Honolulu, HI 96816
Phone: 808-551-2686

To: Wayne Yoshioka
Director Department of Transportation Services
City and County of Honolulu
650 S. King St. 3rd Floor
Honolulu, HI 96813

Regarding the DEIS for the Rail Project in Honolulu

Dear Mr. Yoshioka:

My comments regarding the DEIS for the rail project in Honolulu have to do with the financing of the $5 billion cost.

In the beginning of this process, I heard representatives of the city, including you, state how we would finance the rail when it was being estimated at $3.5 billion. That number, we in the public were assured, was covered with the General Excise Tax increase of 12.5 percent, the federal funding of $900 million and $1 billion in contingencies.

As you know, the economy has tanked, so our GE tax revenue is way down from estimated figures. We still have not been approved for the federal funding. And the cost of the project has gone up by $1.5 billion from earlier estimates.

The mayor wants to start giving out contracts for this project and this is where I have a major concern.

Does the city have a plan to protect us from financial liability for this project in the event we can not raise the money necessary to build it? Call it a parachute plan or whatever, but are we going to be tied in to contracts for this project if the money we collect does not match the money we need for it?

Since the mayor has promised over and over again that he will not raise taxes any more in order to pay for rail, I would like to know what will be done to make the costs for rail match once again with the projected funding for it.

Thank you for your time concerning this matter.

Regards,

Jay McWilliams

(copy) Governor Linda Lingle Hawaii State Capitol 415 S. Beretania St. 5th Floor Honolulu, HI 96813

(copy) Honolulu City Council Members via email

AR00002522

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, 3RD FLOOR
HONOLULU, HAWAII 96813
Phone: (808) 768-8305 • Fax: (808) 768-4730 • Internet: www.honolulu.gov

MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT2/09-298695R

Mr. Jay McWilliams
1499 Alencastre Street
Honolulu, Hawaii 96816

Dear Mr. McWilliams:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

The Project will be implemented through a large series of contracts, currently expected to number approximately 33. The City will not enter into an individual contract unless money sufficient to pay for the contract has been appropriated.

Section 6.3 of the Final EIS describes the funding sources anticipated to be used to pay for the capital costs of the Project and takes into account the current economic downturn. Capital costs of the Project, including finance charges, are expected to be fully paid for by a combination of FTA Section 5309 New Starts Funds and FTA Section 5307 Funds from the Federal government and revenues from the County's General Excise and Use Tax surcharge levied from 2007 through 2022. Section 6.6 of the Final EIS describes risks and uncertainties associated with these funding assumptions.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
Creation Date :	1/15/2009
Creator Affiliation :	
First Name :	KATHLEEN
Last Name :	MEIER
Business/Organization :	
Address :	629 PALAWIKI STREET
Alternative Preference :	
Apt./Suite No. :	
City :	KAILUA
State :	HI
Zip Code :	96734
Email :	KMEIER-CPA@HAWAII.RR.COM
Telephone :	808.263.8884
Telephone Extension :	
Add to Mailing List :	Both
Submission Method :	Website
Other Submission Method :	
Submission Date :	01/15/2009

Submission Content/Notes : MY CONCERNS:

1. OUR PROJECT IS AN ELEVATED, HEAVY RAIL SYSTEM - NOT LIGHT RAIL

2. TOTAL COSTS ESTIMATES OF THE RAIL ARE NOT LINE LINE WITH OTHER SYSTEMS RECENTLY EMPLOYED

3. FUNDS PROVIDED BY TOURIST GET PAYMENTS ARE ALREADY SIGNIFICANTLY LESS THAT ESTIMATED AND THIS TRENO WILL CONTINUE

4. THE CITY IS FACING MONUMENTAL FINANCIAL COMMITMENTS FOR SEWER, ROADS, AND LANDFILL PROJECTS

5. THE RECENTLY ANNOUNCED CONTRAFLOW LANES AND MIDDLE STREET LANES ON THE FREEWAY SHOULD ALEVIATE ALOT OF CONGESTION. THE NEED FOR A RAIL SYSTEM SHOULD BE REVISITED ONCE THESE CHANGES HAVE BEEN IMPLEMENTED.

6. THE RAIL IS AN INFLEXIBLE SYSTEM THAT CANNOT AVAIL ITSELF
OF NEW TECHNOLOGY.

7. CALTRANS AND UC BERKLEY ARE CONDUCTING AN AUTOMATED BUS GUIDANCE SYSTEM - A MAGNETIC GUIDANCE SYSTEM DEMONSTRATION PROJECT IN SAN LEANDRO [ALSO IN EUGENE, OREGON]. THE ESTIMATED COSTS FOR BUS RAPID TRANSIT ARE MATERIALLY LESS THAN LIGHT RAIL NOT TO MENTION HEAVY RAIL.

8. I DO NOT BELIEVE THE PROJECTED RIDERSHIP WILL TRANSLATE TO ACTUAL RIDERSHIP AND THAT THE ACTUAL RIDERSHIP WILL NOT RESULT IN SIGNIFICANT RELIEF.

9. TECHNOLOGY IS RAPIDLY CHANGING ALL ASPECTS OF OUR LIVES - TELECOMMUTING FOR WORK AND SCHOOLING, ELECTRIC & FUEL CELL CARS. WE NEED A SYSTEM THAT CAN BE ADAPTABLE TO OUR CHANGING NEEDS AND TECHNOLOGY.

10. AN ELEVATED RAIL SYSTEM IS TRULY CONTRARY TO A HAWAII SENSE OF PLACE. STATIONS EQUIPED WITH ESCALATORS, ELEVATORS, BATHROOMS AND SHELTERS ARE GRAFFITI MAGNETS.

PLEASE BE CAREFUL WITH OUR AND FUTURE GENERATION'S MONEY.

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, 3RD FLOOR
HONOLULU, HAWAII 96813
Phone: (808) 768-8305 • Fax: (808) 768-4730 • Internet: www.honolulu.gov

MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

May 21, 2010

RT9/09-333705

Ms. Kathleen Meier
629 Palawiki Street
Kailua, Hawaii 96734

Dear Ms. Meier:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following responses address comments regarding the above-referenced submittal:

1. *The system specification is compatible with either a light- or rapid-rail vehicle.*

2. *While the capital cost estimates for the Project, which are used in the financial analysis, are higher than those of other recent rail lines this reflects higher construction costs in Hawaii and higher shipping costs of materials to Hawaii.*

3. *The financial analysis described in the Final EIS is subject to a number of risks and uncertainties, as described in Section 6.6 of the Final EIS. The Final EIS reflects the latest economic trends in both cost and revenue forecasts.*

4. *Enabling legislation for the County General Excise and Use Tax surcharge and Ordinance 07-001 preclude the use of the collected funds for purposes other than a fixed guideway transit system.*

5. *A travel demand forecasting model was used to forecast roadway conditions in 2030, both with and without the Project. As described in Chapter 3, Section 3.4 of the Final EIS, modeling took into account committed transportation projects anticipated to be operational by 2030. Committed transportation projects are those identified in the Oahu Regional Transportation Plan (as shown in Table 2-4 of the Final EIS). These projects include a p.m. reversible 'zipper' lane and widening H-1 at Middle Street. As shown in Tables 3-9 and 3-10 of the Final EIS, roadway conditions will get worse, despite these improvements. However, these tables also show that traffic conditions will improve up to 11 percent with the fixed guideway system. In addition, a Managed Lane Alternative was evaluated during the Alternatives Analysis phase of the Honolulu High-Capacity Transit Corridor Project. While the Managed Lane Alternative would reduce freeway congestion (measured as vehicle hours of delay), it would increase overall system congestion by inducing additional travelers to drive, which would result in increased congestion on arterial and collector facilities accessing the freeways. System-wide congestion will be greater in 2030 than today. Spot congestion in some locations could decrease with the managed lane alternative; however, the reversible managed lane alternative would result in an increase in system-wide congestion compared to the No Build Alternative, while the Project will result in a decrease in congestion compared to the No Build Alternative.*

6. *Modern rail technology continues to evolve. The modern transit vehicle is less similar to an eighteenth-century locomotive than a modern automobile is to the Model T.*

7. *Guided bus systems constructed on an elevated guideway, as would be required for use in Honolulu, would require a larger and more expensive structure than required for rail transit.*

8. *As discussed in Chapter 3, Section 3.2.1 of the Final EIS, the ridership forecasts are based on a travel demand forecasting model used by the Oahu Metropolitan Planning Organization (OahuMPO) for the Oahu Regional Transportation Plan. The OahuMPO model is based on "best practices" for urban travel models in the U.S. This modeling approach has proven effective in estimating ridership in other areas such as Los Angeles County, Salt Lake City, and the Denver region in the last 10 years. This model is based on guidelines established by the FTA. Projections for 2030 have been developed using the travel demand model, which was calibrated and validated to current year conditions. The model is based upon a set of realistic input assumptions regarding land use and demographic changes between now and 2030 and expected transportation levels-of-service on both the highway and public transit system. Based upon the model and these key input assumptions, approximately 116,000 trips per day are expected to use the rapid transit system on an average weekday in 2030. Since the Draft EIS was*

published, the travel demand model has been refined by adding an updated air passenger model, defining more realistic drive access modes to project stations and recognizing a more robust off-peak non-home based direct demand element based on travel surveys in Honolulu.

The Project is among the first in the country to design and undertake an uncertainty analysis of this type of travel forecast. The uncertainty analysis evaluates the variability of the forecast by establishing probabilistic upper and lower limits of ridership projections. FTA has worked closely with the City during this work effort. A variety of factors were considered in the uncertainty analysis, including the following:

- *Variations in assumptions regarding the magnitude and distribution patterns of future growth in the Ewa end of the corridor*
- *The impact of various levels of investment in highway infrastructure*
- *The expected frequency of service provided by the rapid transit system*
- *Park-and-ride behavior with the new system in place*
- *The implications on ridership of vehicle and passenger amenities provided by the new guideway vehicles*

Given all the factors considered, the anticipated limits for guideway ridership in 2030 is expected to be between 105,000 to 130,000 trips per day, bracketing the official forecast of 116,000 riders a day used for all calculations.

As identified in Chapter 3, Table 3-14 of the Final EIS, the Project will result in reduced vehicle hours of delay of 18 percent compared to the No Build alternative. The reduction in delay will be attributable to shifts in travel demand from automobile to transit.

9. *While information technology has enabled people to remain connected from any location, it has not eliminated the need or desire of people to travel on the island.*

10. *As discussed in Section 4.8 of the Final EIS, the Project will be set in an urban context where visual change is expected and differences in scales of structures are typical. The following measures will be included with the Project to minimize negative visual effects and enhance the visual and aesthetic opportunities that it creates:*

    - *Develop and apply design guidelines that will establish a consistent design framework for the Project with consideration of local context.*
    - *Coordinate the project design with the City transit-oriented development program within the Department of Planning and Permitting.*

- *Consult with the communities surrounding each station for input on station design elements.*

- *Consider specific sites for landscaping and trees during the final design phase when plans for new plantings will be prepared by a landscape architect. Landscape and streetscape improvements will serve to mitigate potential visual impacts.*

It should also be noted that the Project will provide users with expansive views from several portions of the corridor by elevating riders above highway traffic, street trees, and low structures adjacent to the alignment. In Section 4.8.3 of the Final EIS, Environmental Consequences and Mitigation under the heading Design Principals and Mitigation, specific Environmental, Architecture and Landscape Design Criteria are listed that will help minimize visual effects of the Project.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Issuance of the Record of Decision under NEPA and acceptance of the Final EIS by the Governor of the State of Hawaii are the next anticipated actions and will conclude the environmental review process for this Project.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

098713

February 2, 2009

RECEIVED
09 FEB 6 P1:29
DIRECTOR'S OFFICE
DEPT OF
TRANSPORTATION SERVICES

Department of Transportation Services
650 South King Street, 3rd Floor
Honolulu, Hawaii 96813

RE: Draft Environmental Impact Statement (DEIS)

Dear Sir or Madam:

As CPA's, we support **viable** and **affordable** traffic solutions for the City and County of Honolulu. We find several flaws regarding funding for the proposed rail project currently estimated to cost $5.5 billion for the airport route adopted on January 28, 2009 and summarized in Section 6 of the Draft Environmental Impact Statement (DEIS). We believe these flaws are of such magnitudes that not only will this project be neither viable nor affordable; this project will jeopardize our City and County's financial health and sustainability.

How realistic are the funding assumptions?

The basis for funding the proposed rail system is a 1/2% excise surcharge assessed on county transactions from January 1, 2007 to December 31, 2021. Using the City's figures provided in Section 6 of the DEIS, this surcharge needs to generate a minimum of $4.1 billion. The cash flow statement of the DEIS includes surcharge tax collections through 2023, two years past the 2021 collection expiration date provided by law. When the taxes for the additional two years are deleted from the City's projection, the required collections are short by $473.5 million (Exhibit A).

The collections from January 2007 to December 2008, total $294 million, substantially below the City's projections. It would require a minimum tax growth rate of 9.46% every year for thirteen (13) years (Exhibit B). Based on the Honolulu's economic history and the current global economy, this growth rate is unattainable.

What do the economists say?

The Council on Revenues (the economic board that provide forecasts of tax revenues to the Governor and State Legislators) issued new tax collection forecasts on January 12, 2009 (Exhibit C.) The forecast for growth in Hawaii tax revenues for 2009 through 2015 are -3.1%, 1%, 3.5%, 5.3%, 6%, 6.5%, and 6.5%. Using these forecasts, it would require an increase, compounded annually, in collections of 25.29% from 2016 to 2021 (Exhibit D). These forecasts do not include the additional cost for borrowing funds due to the shortfall in surcharge tax collections. This rate of required growth in tax collections is unattainable based on our economic history.

The funding should be based on the economic realities and reasonable factors:

1. 2007 and 2008: The actual surcharge collections
2. 2009 through 2015: The Council on Revenues forecasts
3. 2016 through 2021: Using a 6.5% growth rate of collections

Based on the above assumptions, the City will experience a **$1.26 billion shortfall** by the year 2021 (Exhibit E).

How much will the federal government contribute?

The DEIS estimates this rail project will cost approximately $5.5 billion, with $ 1.4 billion to be provided by the U.S. Department of Transportation. The federal funds are to be paid through their "New Starts" grants in the amount $200 million per year for seven [7] consecutive years. The 2009 budget for "new starts" is $1.475 billion for 30 grants that were selected from mass transit program applications from municipalities nationwide. The average grant is $47 million with two-thirds [2/3] of the grants going to cities with populations averaging 5.4 times the size of Honolulu. The average grant for smaller cities such as Honolulu is $23.5 million. There is great competition for these grants. The DEIS assumption that Honolulu will successfully obtain 1/7 of the country's mass transit budget for seven consecutive years is unrealistic and not viable.

What are the risks?

- Honolulu could have a rail system that is never completed. With no monies available to complete the project, the useless concrete pillars will be a monument to an irresponsible act that will mar our landscape for years to come.
- Honolulu's credit rating could plummet resulting in higher unbudgeted costs for interest on borrowed funds.
- Residents could face tax increases to pay for the shortage that will put undue economic pressure on them and future generations.
- Honolulu could be bankrupt due to all the debt that even future generations cannot service.

The City and County of Honolulu has a duty to its residents and taxpayers to act appropriately and prudently when committing our resources to traffic solutions. **The solutions must be viable and affordable.** We await your response to our concerns.

Very truly yours,

Janet I. Jensen, CPA
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Honolulu, Hawaii 96816
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Facsimile: 808.521.5065
Email: dave@davidelathamcpa.com

Honolulu Rail
Draft Environmental Impact Statement
Cash Flow for Surcharge collections on Airport alternative
(prepared on a fiscal June 30 year end)

Fiscal Year	Projected Collections	
2007	13,000,000	
2008	161,000,000	
2009	188,000,000	
2010	198,000,000	
2011	207,000,000	
2012	214,000,000	
2013	228,000,000	
2014	242,000,000	
2015	253,000,000	
2016	265,000,000	
2017	274,000,000	
2018	285,000,000	
2019	300,000,000	
2020	309,000,000	
2021	321,000,000	
12/31/21	168,500,000	
		3,626,500,000
Point at ending of collections		
Shortage		473,500,000
		4,100,000,000
Collections after temination of excise		
2022	168,500,000	
2023	261,000,000	

EXHIBIT A

Honolulu Rail
Excise surcharge with actual collections 2007 & 2008
and required assumptions to fund $4.1 million

Annual Required increased Collection Rate		9.45582%		
Calendar Year	Required % Growth	Required Annual Tax Collections	Cumulative Tax Collections	Required Ave Monthly Collections
2007/2008 Actual		294,000,000	294,000,000	12,250,000
2009	9.46%	160,900,055	454,900,055	13,408,338
2010	9.46%	176,114,475	631,014,530	14,676,206
2011	9.46%	192,767,543	823,782,073	16,063,962
2012	9.46%	210,995,295	1,034,777,368	17,582,941
2013	9.46%	230,946,630	1,265,723,998	19,245,552
2014	9.46%	252,784,528	1,518,508,525	21,065,377
2015	9.46%	276,687,377	1,795,195,903	23,057,281
2016	9.46%	302,850,438	2,098,046,340	25,237,536
2017	9.46%	331,487,430	2,429,533,771	27,623,953
2018	9.46%	362,832,285	2,792,366,055	30,236,024
2019	9.46%	397,141,053	3,189,507,108	33,095,088
2020	9.46%	434,693,996	3,624,201,103	36,224,500
2021	9.46%	475,797,877	4,099,998,981	39,649,823

EXHIBIT B

LINDA LINGLE
GOVERNOR

JAMES R. AIONA, JR.
LT. GOVERNOR

PAUL H. BREWBAKER
CHAIR

JACK P. SUYDERHOUD
VICE-CHAIR

MEMBERS:
Carl S. Bonham
Dean K. Hirata
Pearl Imada Iboshi
Richard F. Kahle, Jr.
Albert Yamada

COUNCIL ON REVENUES

STATE OF HAWAII
P.O. BOX 259
HONOLULU, HAWAII 96809-0259

January 12, 2009

The Honorable Linda Lingle
Governor, State of Hawaii
Executive Chambers
State Capitol, Fifth Floor
Honolulu, HI 96813

Dear Governor Lingle:

At its meeting on January 9, 2009, the Council on Revenues adjusted downward the forecast growth rates of General Fund tax revenues. The forecast was reduced from -0.5% to -3.0% for fiscal year (FY) 2009, from 3.5% to 1.0% for FY 2010, and from 4.5% to 3.5% for FY 2011. The Council also updated its forecasts of General Fund tax revenues for FYs 2012 through 2015, generally lowering the revenue gains while leaving the percentage increases the same for the out-year projections.

The revised forecasts of state general fund tax revenues for fiscal years 2009 through 2015 are listed below:

Fiscal Year	Thousands of Dollars	% Growth From Previous Year
2009	$4,502,616	-3.0%
2010	$4,547,642	1.0%
2011	$4,706,809	3.5%
2012	$4,956,270	5.3%
2013	$5,253,646	6.0%
2014	$5,595,133	6.5%
2015	$5,958,817	6.5%

Line-item detail of State General Fund tax revenues by revenue category for FY 2009 through FY 2015 are presented in the attached table. These detailed forecasts are based on the Council's forecast for total state general fund tax revenues and the econometric model currently used by the Tax Research and Planning Office.

EXHIBIT C

Honolulu Rail
Excise surcharge with actual collections 2007 & 2008,
Council on Revenues tax collection projection 2009–2015
and required assumptions to fund $4.1 million by 2021

Annual
Required increased 25.28750%
Collection Rate

	% Growth by Council On revenues	Required Annual Tax Collections	Cumulative Tax Collections	Required Ave Monthly Collections
2007/2008 Actual		294,000,000	294,000,000	12,250,000
2009	-3.00%	142,590,000	436,590,000	11,882,500
2010	1.00%	144,015,900	580,605,900	12,001,325
2011	3.50%	149,056,457	729,662,357	12,421,371
2012	5.30%	156,956,449	886,618,805	13,079,704
2013	6.00%	166,373,836	1,052,992,641	13,864,486
2014	6.50%	177,188,135	1,230,180,776	14,765,678
2015	6.50%	188,705,364	1,418,886,139	15,725,447
2016	25.29%	236,424,233	1,655,310,372	19,702,019
2017	25.29%	296,210,010	1,951,520,382	24,684,168
2018	25.29%	371,114,117	2,322,634,499	30,926,176
2019	25.29%	464,959,599	2,787,594,098	38,746,633
2020	25.29%	582,536,258	3,370,130,356	48,544,688
2021	25.29%	729,845,114	4,099,975,469	60,820,426

EXHIBIT D

Honolulu Rail
Excise surcharge with actual collections 2007 & 2008,
Council on Revenues tax collection projection 2009~2015
Funding the shortfall with 5.5% Bonds
6.5% growth rate 2016 to 2021

	% Growth by Council On revenues	Required Annual Tax Collections	Cumulative Tax Collections
2007/2008 Actual		294,000,000	294,000,000
2009	-3.00%	142,590,000	436,590,000
2010	1.00%	144,015,900	580,605,900
2011	3.50%	149,056,457	729,662,357
2012	5.30%	156,956,449	886,618,805
2013	6.00%	166,373,836	1,052,992,641
2014	6.50%	177,188,135	1,230,180,776
2015	6.50%	188,705,364	1,418,886,139
2016	6.50%	200,971,212	1,619,857,352
2017	6.50%	214,034,341	1,833,891,693
2018	6.50%	227,946,573	2,061,838,266
2019	6.50%	242,763,101	2,304,601,367
2020	6.50%	258,542,702	2,563,144,069
2021	6.50%	275,347,978	2,838,492,047
		Shortfall	1,261,507,953
		Required	4,100,000,000

EXHIBIT E

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, 3RD FLOOR
HONOLULU, HAWAII 96813
Phone: (808) 768-8305 • Fax: (808) 768-4730 • Internet: www.honolulu.gov

MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 1, 2010

RT2/09-298713R

Ms. Kathleen S. Meier
629 Palawiki Street
Kailua, Hawaii 96734

Dear Ms. Meier:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

The Final EIS includes General Excise and Use Tax (GET) surcharge collections through December 31, 2022, in accordance with City Ordinance 05-027 which established the 0.5 percent County surcharge on the GET through this date. As shown in Table 6-4 in the Final EIS, the net GET surcharge revenue will equal $3,524 million (YOE $). The analysis in Chapter 6 of the Final EIS takes the current economic downturn into account.

Section 6.6 of the Final EIS discusses risks and uncertainties associated with the funding assumptions for the Project. A subsection under Section 6.6.3 has been added since the Draft EIS was published to address the Council on Revenues' forecasts. As stated in this section, in the short-term, GET surcharge revenues are subject to uncertainties related to the magnitude and timing of the economic recovery on Oahu. Over the long-term, GET surcharge revenues on Oahu depend on a variety of underlying economic factors outside of the City's control that may result in a higher or lower projection than the one used in this EIS.

While GET surcharge collections have gone down, so too have the costs of the Project. However, if GET surcharge revenues and/or Federal funding are not sufficient to meet the cash-flow requirement to cover capital expenditures, other potential revenue sources will be developed to close the funding gap.

The financial plan is balanced for the entire Project so there will not be a situation in which only a portion of the system will be built. If there is a shortfall, additional revenue sources will be identified. As noted above, Section 6.6 of the Final EIS discusses risks and uncertainties, as well as the potential sources to cover shortfalls.

The magnitude and timing of Federal funding is one source of risk that is discussed in Chapter 6 of the Final EIS. Density and transit use in the corridor are among the highest in the nation and higher than most areas that have qualified for New Starts funding in recent years. This Project has been developed in coordination with FTA since its inception. There is no indication to suggest that the Project will not qualify for the Federal funding requested.

The financial plan was developed in consideration of safeguarding the City's credit rating in light of the likelihood of General Obligation bond sales required to bridge any year-by-year funding shortfalls, with all debt service costs paid with GET surcharge revenues, because FTA Section 5309 will pay for some financing costs. The New Starts funds are also proposed for a significant increase in the latest Federal budget proposal. Further, there has been no indication from the FTA that the requested amount is unreasonable or unrealistic.

As discussed in Section 6.4.2 of the Final EIS, the City's contribution to transit operation and maintenance is currently funded through Federal funding, fare revenues, and the City's General and Highway Funds. This funding will be used to fund operating and maintenance costs of the Project. The General Fund includes property tax revenues and other taxes and fees. Beyond collection of property taxes that fund City operations, for which the City develops rates on an annual basis and part of which will fund transit services, there is no anticipated impact to property taxes. Fixed guideway operation costs will represent between 2 and 3 percent of the City's annual operating budget. Property tax revenues are not expected to be used to fund construction of the Project.

The financial plan is structured to ensure Honolulu will not go bankrupt. The debt amount is a minor part of the Project at less than 10 percent.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
Creation Date :	1/7/2009
Creator Affiliation :	
First Name :	Aulama
Last Name :	Melei
Business/Organization :	Good Samaritan Church
Address :	P.O Box 31029
Alternative Preference :	
Apt./Suite No. :	
City :	Honolulu
State :	HI
Zip Code :	96820
Email :	
Telephone :	688-3245
Telephone Extension :	
Add to Mailing List :	Standard
Submission Method :	Website
Other Submission Method :	
Submission Date :	01/07/2009
Submission Content/Notes :	We support the Rail transit

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, 3RD FLOOR
HONOLULU, HAWAII 96813
Phone: (808) 768-8305 • Fax: (808) 768-4730 • Internet: www.honolulu.gov

MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-333484

Aulama Melei
P.O. Box 31029
Honolulu, Hawaii 96820

Dear Aulama Melei:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraph addresses your comments regarding the above-referenced submittal:

Your preference for a Fixed Guideway Transit Alternative has been noted. While each of the alternatives discussed in the Draft EIS includes trade-offs between benefits and impacts, the Airport Alternative from East Kapolei to Ala Moana has been selected as the Preferred Alternative as described above. As compared to the alternatives discussed in the Draft EIS, the Airport Alternative will carry the most passengers, provide the greatest transit-user benefits, and result in the fewest vehicle hours of delay. It will provide access to employment centers at Pearl Harbor Naval Base and Honolulu International Airport and will serve the Salt Lake neighborhood with connecting bus service. Of the three Build Alternatives addressed in the Draft EIS, the Airport Alternative will have slightly less impacts to the natural and built environment analyzed in the Draft EIS. During the public comment period on the Draft EIS, the public overwhelmingly supported the Airport Alternative. Of the comments that specifically supported one of the

alternatives, more than 75 percent were in support of the Airport Alternative. For more information this selection is discussed in Section 2.4 of the Final EIS. Since publication of the Draft EIS, design has been advanced, further analysis has been completed, and information has been added in response to comments on the Draft EIS and agency coordination. The Final EIS discusses the process that was used to select the Preferred Alternative, how comments were considered in the decision-making process, impacts and mitigation commitments.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
Creation Date :	1/7/2009
Creator Affiliation :	
First Name :	Taeotafe
Last Name :	Melei
Business/Organization :	Good Samaritan Church
Address :	P.O Box 31029
Alternative Preference :	
Apt./Suite No. :	
City :	Honolulu
State :	HI
Zip Code :	96820
Email :	
Telephone :	
Telephone Extension :	
Add to Mailing List :	Standard
Submission Method :	Website
Other Submission Method :	
Submission Date :	01/07/2009
Submission Content/Notes :	Lets build the rail transit for the sake of the people who are in need of transportation

DEPARTMENT OF TRANSPORTATION SERVICES

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-333564

Mr. Taeotafe Melei
P.O. Box 31029
Honolulu, Hawaii 96820

Dear Mr. Melei:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraph addresses your comments regarding the above-referenced submittal:

Your preference for a Fixed Guideway Transit Alternative has been noted. While each of the alternatives discussed in the Draft EIS includes trade-offs between benefits and impacts, the Airport Alternative from East Kapolei to Ala Moana has been selected as the Preferred Alternative as described above. As compared to the alternatives discussed in the Draft EIS, the Airport Alternative will carry the most passengers, provide the greatest transit-user benefits, and result in the fewest vehicle hours of delay. It will provide access to employment centers at Pearl Harbor Naval Base and Honolulu International Airport and will serve the Salt Lake neighborhood with connecting bus service. Of the three Build Alternatives addressed in the Draft EIS, the Airport Alternative will have slightly less impacts to the natural and built environment analyzed in the Draft EIS. During the public comment period on the Draft EIS, the public overwhelmingly supported the Airport Alternative. Of the comments that specifically supported one of the

alternatives, more than 75 percent were in support of the Airport Alternative. For more information this selection is discussed in Section 2.4 of the Final EIS. Since publication of the Draft EIS, design has been advanced, further analysis has been completed, and information has been added in response to comments on the Draft EIS and agency coordination. The Final EIS discusses the process that was used to select the Preferred Alternative, how comments were considered in the decision-making process, impacts and mitigation commitments.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
Creation Date :	12/11/2008
Creator Affiliation :	
First Name :	Clifford
Last Name :	Mercado
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Address :	91-911 Nohoiho'ewa Place
Alternative Preference :	
Apt./Suite No. :	
City :	Ewa Beach
State :	HI
Zip Code :	96706
Email :	
Telephone :	
Telephone Extension :	
Add to Mailing List :	None
Submission Method :	Website
Other Submission Method :	
Submission Date :	12/11/2008
Submission Content/Notes :	I THOUGHT I MADE THIS CLEAR TO MUFI HANNAMAN AND ALL OF HIS HENCHMEN. BUT I GUESS I DID NOT SUCCEED. THEY USED MY TAX MONEY TO ADVERTISE THEIR SIDE OF THE STORY AND GOT THE MEASURE PASSED BY A BUNCH OF ILLEGALLY MAL- INFORMED VOTERS. I AM NOW GOING TO ASK YOU TO HEAR MY PLEA. WE DO NOT NEED THIS FORM OF TRANSPORTATION (THE TRAIN) AND I DON'T WANT YOU OR ANY ONE ELSE TO SPEND A DIME ON THIS LAME IDEA. SO DO WHAT YOU CAN TO SQUASH THIS PROJECT. THE GOVERNOR, MR. PANOS AND MRS. KOBAYASHI HAVE THE RIGHT IDEA.....A RAISED ADDITION ABOVE THE EXISTING FREEWAY WILL DO THE JOB CORRECTLY. MERRY CHRISTMAS CLIFFORD D. MERCADO Introhaw@lava.net

DEPARTMENT OF TRANSPORTATION SERVICES

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-331935

Mr. Clifford Mercado
91-911 Nohoihoewa Place
Ewa Beach, Hawaii 96706

Dear Mr. Mercado:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall indentify the Preferred Alternative (23 C.F.R. § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraph addresses your comments regarding the above-referenced submittal:

Your comments have been noted. Chapter 2 of the Final EIS summarizes the alternatives screening and selection process. Beginning in the fall of 2005, an initial screening process considered alternatives identified through previous transit studies, a field review of the study corridor, an analysis of current population and employment data for the study corridor, a literature review of technology modes, ongoing work completed as part of the Oahu Regional Transportation Plan 2030 (ORTP) prepared by the Oahu Metropolitan Planning Organization (OahuMPO) (OahuMPO 2007), and public and agency comments received during the formal Alternatives Analysis scoping process.

The screening process is documented in the Honolulu High-Capacity Transit Corridor Project Alternatives Screening Memorandum (DTS 2006a). Three scoping meetings were held during the screening process in December 2005, which included a presentation of initial alternatives to the public, interested agencies, and officials to receive comments on the Purpose and Need, alternatives, and scope of the Alternatives Analysis. Refinements were made to the alternatives based on the public input during scoping.

After completion of screening in the winter of 2006, the following alternatives were studied in the Alternatives Analysis: No Build Alternative, Transportation System Management (TSM) Alternative, Managed Lane Alternative, and the Fixed Guideway Alternative. After review of the Alternatives Analysis Report and consideration of public comments, the City Council identified a fixed guideway transit system extending from Kapolei to UH Manoa with a connection to Waikiki as the Locally Preferred Alternative. This identification, which eliminated the TSM and Managed Lane Alternatives from further consideration, became Ordinance 07-001 on January 6, 2007. The NEPA process considered a range of alternatives that was consistent with the identified Locally Preferred Alternative. As discussed in Section 2.2, there were no alternatives that had not been previously studied and eliminated for good cause that would satisfy the Purpose and Need at less cost, with greater effectiveness, or less environmental or community impact.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

May 21, 2010

RT9/09-330913

Ms. Cheri Michel
cherimichel@earthlink.net

Dear Ms. Michel:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall indentify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraph addresses comments regarding the above-referenced submittal:

Your preference for the Airport Alternative has been noted. While each of the alternatives includes trade-offs between benefits and impacts, the Airport Alternative from East Kapolei to Ala Moana Center has been selected as the Preferred Alternative. The identification of the Airport Alternative as the Preferred Alternative was made by the City to comply with FTA's NEPA regulations that state that the Final EIS should focus on the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative, public input on the Draft EIS, and City Council Resolution 08-261 identifying the Airport Alternative as the Project. The selection of the Airport Alternative is described in Chapter 2 of this Final EIS. The discussion of the alternatives considered is included in Chapter 2 of this Final EIS and the Alternatives Analysis. As discussed in Section 3.4.2 of this Final EIS, the Airport Alternative will carry the most passengers with 116,000 daily passengers and 282,500 daily trips in 2030, thereby resulting in the greatest transit-user benefits. The Airport Alternative will also result in the fewest vehicle miles traveled and vehicle hours of delay, as well as provide

access to major employment areas, including Honolulu International Airport, that will have substantially greater ridership than the other alternatives considered.

The FTA and DTS appreciate your interest in the Project. The Final EIS has been issued in conjunction with the distribution of this letter. You may view the Final EIS on the Project website at www.honolulutransit.org. You may request a DVD of the Final EIS and additional content through the "Contact Us" tab on the website or by calling the Project hotline at 566-2299. Issuance of the Record of Decision under NEPA and acceptance of the Final EIS by the Governor of the State of Hawaii are the next anticipated actions and will conclude the environmental review process for this Project.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Status :	Initial Action Needed
Creation Date :	11/25/2008
Creator Affiliation :	
First Name :	Cheri
Last Name :	Michel
Business/Organization :	
Address :	
Alternative Preference :	Airport
Apt./Suite No. :	
City :	
State :	HI
Zip Code :	96706
Email :	cherimichel@earthlink.net
Telephone :	
Telephone Extension :	
Add to Mailing List :	Email
Submission Method :	Website
Other Submission Method :	
Submission Date :	11/25/2008
Submission Content/Notes :	I strongly support rerouting the rail system to include the Honolulu International Airport. To bypass such an integral part of our infrastructure seems short sighted and irresponsible. After waiting so long to get this rail system plan moving, please do not allow a political tug-of-war to impede our ability to take care of our future here on Oahu.

DEPARTMENT OF TRANSPORTATION SERVICES

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-330913

Ms. Cheri Michel
cherimichel@earthlink.net

Dear Ms. Michel:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall indentify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraph addresses your comments regarding the above-referenced submittal:

Your preference for the Airport Alternative has been noted. While each of the alternatives discussed in the Draft EIS includes trade-offs between benefits and impacts, the Airport Alternative from East Kapolei to Ala Moana has been selected as the Preferred Alternative as described above. As compared to the alternatives discussed in the Draft EIS, the Airport Alternative will carry the most passengers, provide the greatest transit-user benefits, and result in the fewest vehicle hours of delay. It will provide access to employment centers at Pearl Harbor Naval Base and Honolulu International Airport and will serve the Salt Lake neighborhood with connecting bus service. Of the three Build Alternatives addressed in the Draft EIS, the Airport Alternative will have slightly less impacts to the natural and built environment analyzed in the Draft EIS. During the public comment period on the Draft EIS, the public overwhelmingly supported the Airport Alternative. Of the comments that specifically supported one of the alternatives, more than 75 percent were in support of the Airport Alternative. For more information this selection is discussed in Section 2.4 of the Final EIS. Since publication of the

Draft EIS, design has been advanced, further analysis has been completed, and information has been added in response to comments on the Draft EIS and agency coordination. The Final EIS discusses the process that was used to select the Preferred Alternative, how comments were considered in the decision-making process, impacts and mitigation commitments.

The FTA and DTS appreciate your interest in the Project. The Final EIS has been issued in conjunction with the distribution of this letter. You may view the Final EIS on the Project website at www.honolulutransit.org. You may request a DVD of the Final EIS and additional content through the "Contact Us" tab on the website or by calling the Project hotline at 566-2299. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Status :	Initial Action Needed
Creation Date :	12/8/2008
Creator Affiliation :	
First Name :	Bryan
Last Name :	Mick
Business/Organization :	City and County
Address :	
Alternative Preference :	
Apt./Suite No. :	
City :	
State :	HI
Zip Code :	98613
Email :	bmick@honolulu.gov
Telephone :	
Telephone Extension :	
Add to Mailing List :	None
Submission Method :	Website
Other Submission Method :	
Submission Date :	12/08/2008

Submission Content/Notes : I got this email. Please send me the answers so I can respond. Mahalo!

1. In the end, how much will rail cost?
 a. The mayor's office today (via honolulutransit.org, 12/4/08) claims rail will cost $5.3 to $5.4 billion dollars, depending on the route.
Here is the claim, quoted: "The Salt Lake route will cost an inflation-adjusted $5.3 billion and the airport route will cost an inflation-adjusted $5.4 billion."
 i. From what report do these figures come from?

2. How will we pay for rail?
a. Here's a list from the honolulutransit.org website: Firstly, will you please list and verify your sources for each of these?

-"From the 1/2% GET surcharge" = $2.6 - $3.2 billion (49%-60% of $5.3 billion) - When will this tax sunset?

-"The Federal Transit Administration's New Starts program." = $1.7 - $2.2 billion (32%-42% of $5.3 billion) - Mr. Cayetano and others have said this money is not certain (http://www.honoluluadvertiser.com/article/20081013/BREAKING01/81013045): what reasons (historical examples and laws), documents and/or testimonies do you have to dispute Mr. Cayetano's claim?

-"$15.5 million for the planning phase has been appropriated by Congress for this year" = (0.28% of $5.3 billion-- is this worth mentioning?)

-"and another $20 million is in the pipeline." (0.38% of $5.3 billion- Again, a negligible amount unless there are larger political implications to this (if so, what are they, and how can we be certain of them?))

-"Local funding, with more than $250 million banked for the project." (4.7% of $5.3 billion) - Who specifically are these investors?

-"Federal funding is expected to increase significantly as the project moves to construction." - Which historical examples, laws, or testimonies of federal officials should we build our expectations for this on?

-Totalling all these, this puts revenues at: $4.6-$5.7 billion, well above the $3.7 billion number the mayor claimed not long ago. Is the mayor responsible for this billion dollar gap? If not, who is?

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010 RT10/09-336951

Mr. Bryan Mick
bmick@honolulu.gov

Dear Mr. Mick:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

The total cost of the Project, including finance charges, is $4.6 billion in 2009 dollars and $5.5 in inflated dollars. Please refer to Chapter 6 of the Final EIS. Table 6-1 of the Final EIS provides information about the Project's cost. The capital plan that analyzes capital expenditures for the Project is presented in Section 6.3 of the Final EIS, including a description of the amount of funding anticipated from various sources. Section 6.6 of the Final EIS describes risks and uncertainties associated with these funding assumptions.

In addressing your question regarding the funding for the Project:

- *The General Excise and Use Tax (GET) surcharge will raise $3.524 billion through 2022. This represents a reduction in GET revenue as a result of the economic downturn.*

- *The Federal New Starts program will contribute $1.55 billion and is subject to Congressional approval. Indications from the FTA have been very supportive.*
- *The $15.5 million and $20 million FTA allocations are provided to support the planning and engineering efforts and reflect the support of the Project.*
- *The $250 million is a reference to the funding already collected from the GET surcharge since January 2007. As of August 2009, over $400 million has been collected from the GET surcharge.*

The total from all sources is $5.5 billion in inflated dollars, the amount needed to build the Project.

The FTA and DTS appreciate your interest in the Project. The Final EIS has been issued in conjunction with the distribution of this letter. You may view the Final EIS on the Project website at www.honolulutransit.org. You may request a DVD of the Final EIS and additional content through the "Contact Us" tab on the website or by calling the Project hotline at 566-2299. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Status :	Initial Action Needed
Creation Date :	12/29/2008
Creator Affiliation :	
First Name :	Thomes
Last Name :	Miguel
Business/Organization :	PHNSY & IMF
Address :	667 Safeguard St.
Alternative Preference :	
Apt./Suite No. :	
City :	Pearl Harbor
State :	HI
Zip Code :	96782
Email :	thomas.miguel@navy.mil
Telephone :	4738000
Telephone Extension :	6137
Add to Mailing List :	Email
Submission Method :	Website
Other Submission Method :	
Submission Date :	12/29/2008
Submission Content/Notes :	To whom it may concern, I was a IBEW steward in PHNSY and approximately four years ago I was part of a team to negotiate for all Shipyard workers to obtain a free Bus pass. Originally shipyards were required to pay $17 to be able to get a monthly Bus pass, but today we receive a free Bus pass due to the Union negotiation and the DOT paying for Federal workers public transportation. Today we have 800+ Bus riders and 800+ Van Pool users all paid by DOT. Unfortunately our numbers would increase if we had a system like the Rapid Transit that comes to Pearl Harbor at various times through out the day. Presently we only have buses running at the start of our work day (0630 hours) and at the end (1500 hours) and they only service six areas. We feel that if the Rapid Transit does come close to Pearl Harbor the ridership will go up and many more workers at Pearl would take advantage of the free passes. This must happen to help make Rapid Transit become a success. Mahalo Tommy Miguel

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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HONOLULU, HAWAII 96813
Phone: (808) 768-8305 • Fax: (808) 768-4730 • Internet: www.honolulu.gov

MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-332338

Mr. Thomas Miguel
667 Safeguard Street
Honolulu, Hawaii 96818

Dear Mr. Miguel:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraph addresses your comments regarding the above-referenced submittal:

Your preference for the Airport Alternative has been noted. While each of the alternatives discussed in the Draft EIS includes trade-offs between benefits and impacts, the Airport Alternative from East Kapolei to Ala Moana has been selected as the Preferred Alternative as described above. As compared to the alternatives discussed in the Draft EIS, the Airport Alternative will carry the most passengers, provide the greatest transit-user benefits, and result in the fewest vehicle hours of delay. It will provide access to employment centers at Pearl Harbor Naval Base and Honolulu International Airport and will serve the Salt Lake neighborhood with connecting bus service. Of the three Build Alternatives addressed in the Draft EIS, the Airport Alternative will have slightly less impacts to the natural and built environment analyzed in the Draft EIS. During the public comment period on the Draft EIS, the public overwhelmingly supported the Airport Alternative. Of the comments that specifically supported one of the

alternatives, more than 75 percent were in support of the Airport Alternative. For more information this selection is discussed in Section 2.4 of the Final EIS. Since publication of the Draft EIS, design has been advanced, further analysis has been completed, and information has been added in response to comments on the Draft EIS and agency coordination. The Final EIS discusses the process that was used to select the Preferred Alternative, how comments were considered in the decision-making process, impacts and mitigation commitments. Also, the Project will provide a station at the Pearl Harbor Naval Base.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Action Completed
Creation Date :	11/2/2008
Creator Affiliation :	
First Name :	Jane
Last Name :	Miho
Business/Organization :	
Address :	P.O. Box 1719
Apt./Suite No. :	
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State :	HI
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Email :	janemiho@yahoo.com
Telephone :	
Telephone Extension :	
Add to Mailing List :	Both
Submission Method :	Website
Other Submission Method :	
Submission Date :	11/02/2008
Submission Content/Notes :	I am for the Rail. You must show the public the BIG PICTURE. World & National economy is down turning. Good or Bad: 1) If we don't get it now, future price tag will be over $10B. 2) Rail will curb & help Oahu economy for the next recessionary 5-years. 3) This will create jobs here for the people. This Has to be Advertised Heavily & Promoted. Simiple Thought will Sell!!

DEPARTMENT OF TRANSPORTATION SERVICES

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT8/09-320326

Ms. Jane Miho
P.O. Box 1719
Pearl City, Hawaii 96782

Dear Ms. Miho:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 C.F.R. § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraph addresses your comments regarding the above-referenced submittal:

Your comment regarding rail has been noted. The cost of building a rail system would more than likely increase in the future. This Project is estimated to create an average of about 10,000 per year during the nine-year construction period, as described in Section 4.18.1 of the Final EIS.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
Creation Oate :	11/5/2008
Creator Affiliation :	
First Name :	RALPH
Last Name :	MIRANDA
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Address :	98-135 KANUKU ST.
Alternative Preference :	
Apt./Suite No. :	G
City :	AIEA
State :	HI
Zip Code :	96701
Email :	apache007@yahoo.com
Telephone :	808-429-9718
Telephone Extension :	
Add to Mailing List :	Email
Submission Method :	Website
Other Submission Method :	
Submission Date :	11/05/2008
Submission Content/Notes :	What is the exact plans/location for the rail in Waimalu area... what areas will be affected... I'm renting right now and if I have to move, don't know where I need to move to... Is there a map that shows exactly where the rail will be placed.. and how much of the zoning will be affected?

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT8/09-330348

Mr. Ralph Miranda
98-135 Kanuku Street
Apartment G
Aiea, Hawaii 96701

Dear Mr. Miranda:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraph addresses your comments regarding the above-referenced submittal.

Appendix C (Right-of-Way Plans) of the Final EIS contains specific right-of-way information for the Project, including the Waimalu area. Section 4.19.2 of the Final EIS discusses the potential influence the Project could have on future development. The station areas are where the greatest changes may occur. In March 2009, the City Council approved and the Mayor of Honolulu signed Bill 10 (09-4), which defines the City's approach to transit-oriented development (TOD) around fixed guideway stations. Zoning regulations, which will be developed in late 2009, will address parking standards, new density provisions, open space, and affordable housing. While the Project is coordinating with City and State agencies to encourage development of enhanced pedestrian and bicycle facilities and other land use changes near the stations, the actual construction of such facilities and zoning changes are beyond the scope of the Project. A map of the Project alignment is included in Chapter 2 of the

Final EIS.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Honolulu High-Capacity Transit Corridor Project

Welcome to the Honolulu High-Capacity Transit Corridor Project's Public Hearing for the Draft Environmental Impact Statement/Section 4(f) Evaluation.

This public meeting and hearing has been designed to inform the public about the transit project, explain materials contained in the Draft EIS, answer questions from the public, and collect public input on project issues related to the Draft EIS, Section 106 of the National Historic Preservation Act, Section 4(f) of the U.S. Department of Transportation Act, and floodplains affected by the project.

Please review the project information and ask project staff any questions about the project that you might have. The Draft EIS is available on the project website at www.honolulutransit.org.

You may provide official comments in several ways. Here at this Public Hearing you may provide oral comments to a court reporter who will record them for the record or use this form to provide written comments. After the meeting, you may provide an on-line comment at www.honolulutransit.org or use this form to send a written comment to the Department of Transportation Services. All comments must be postmarked or received by January 7, 2009 in order for them to be included in the Final EIS.

Name: Sally Mist Address: 2747 Puuhonua

Phone: 988-4567 HNL 96822

E-mail: sallymmist@aol.com

Comment(s):

I feel that the initial plan should be from Pearl City to Waikiki via the airport. Many hotel employees live in the ~~Aiea~~ Leeward area, the maintenance facility + parking are at the Pearl City end + it would provide for the needs of many residents since Waikiki has many bus feeder routes.

DEPARTMENT OF TRANSPORTATION SERVICES

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-331977

Ms. Sally Mist
2747 Puuhonua Street
Honolulu, Hawaii 96822

Dear Ms. Mist:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall indentify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

Your preference for the Airport Alternative has been noted. While each of the alternatives discussed in the Draft EIS includes trade-offs between benefits and impacts, the Airport Alternative from East Kapolei to Ala Moana has been identified as the Preferred Alternative as described above. As compared to the other alternatives discussed in the Draft EIS, the Airport Alternative will carry the most passengers, provide the greatest transit-user benefits, and result in the fewest vehicle hours of delay. It will provide access to employment centers at Pearl Harbor Naval Base and Honolulu International Airport and will serve the Salt Lake neighborhood with connecting bus service. Of the three Build Alternatives addressed in the Draft EIS, the Airport Alternative will have slightly lower impacts to the natural and built environment. During the public comment period on the Draft EIS, the public overwhelmingly supported the Airport Alternative. Of the comments that specifically supported one of the alternatives, more than 75 percent were in support of the Airport Alternative.

The Alternatives Analysis phase, which preceded the EIS process, is documented in Chapter 2 of the Final EIS. It evaluated a range of modal and general alignment alternatives, in terms of their costs, benefits, and impacts. The scoping process for the Alternatives Analysis involved a presentation of the viable alternatives to the public and interested public agencies and officials to receive comments on the Purpose and Need, alternatives, and scope of the analysis. Scoping for the EIS followed the FTA process that provides for a culling of alternatives studied in the EIS through an Alternatives Analysis. The scoping process initiated for the Alternatives Analysis included a variety of highway, bus and fixed guideway options for consideration. During the later scoping effort for the EIS, the public was requested to propose alternatives that would satisfy the purpose and need at less cost or with greater effectiveness, less environmental or community impact and to propose alternatives that were not previously studied and eliminated for good cause. The only alternative that emerged that met these criteria was a fixed-guideway alternative following several alternative alignments. All reasonable alternatives that emerged from these processes were ultimately evaluated in the Draft and Final EISs.

Since publication of the Draft EIS, design has been advanced, further analysis has been completed, and information has been added in response to comments on the Draft EIS and agency coordination. The Final EIS discusses the process that was used to select the Preferred Alternative, how comments were considered in the decision-making process, impacts, and mitigation commitments.

As described in Section 2.5.10, Project Phasing, and further in Section 8.6.9, Construction Phasing, in the Final EIS, to support phased opening, the first construction phase must be connected to a maintenance and storage facility, which requires considerable space. No location has been identified closer to Downtown with sufficient available space to construct a maintenance and storage facility. Therefore, construction will begin between East Kapolei and Leeward Community College. The Project will be constructed in phases to accomplish the following:

- *Match the anticipated schedule for right-of-way acquisition and utility relocations.*
- *Reduce the time that each area will experience traffic and community disturbances.*
- *Allow for multiple construction contracts with smaller contract size to promote more competitive bidding.*
- *Match the rate of construction to what can be maintained with local workforce and available financial resources.*
- *Balance expenditure of funds to minimize borrowing.*

The portion of the corridor in the Ewa direction of Pearl Highlands is less developed than the areas in the Koko Head direction. Right-of-way can be obtained more quickly at the west end of the Project; therefore, overall project construction can begin earlier, resulting in lower total construction costs. Construction is planned to continue uninterrupted in the Koko Head direction from Pearl Highlands to Aloha Stadium, Kalihi, and finally to Ala Moana Center.

As portions of the Project are completed, each will be opened incrementally so that system benefits, even if limited during the initial phases, will be realized prior to completion of construction of the entire Project. Bus routes that feed the Waikiki area from the Leeward side of the island will continue to operate during construction to facilitate the transportation of hotel employees to Waikiki.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
Creation Date :	2/6/2009
Creator Affiliation :	
First Name :	J
Last Name :	Mitchell
Business/Organization :	none
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Alternative Preference :	
Apt./Suite No. :	
City :	
State :	HI
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Telephone Extension :	
Add to Mailing List :	None
Submission Method :	Website
Other Submission Method :	
Submission Date :	02/06/2009

Submission Content/Notes : I do not support this rail project as it stands, for several reasons.

It costs too much for what we are getting.
Steel on steel is especially not good for Hawaii due to high maintenance.
At-grade light rail would be infinitely better than elevated steel on steel rail - cheaper and safer, especially due to our earthquake and hurricane prone islands.
I am afraid what it will do to the areas that are developed around it (increased crime, noise, and depression; visual blight)
Again, it is too expensive. 6 billion dollars (or more) for something that will not alleviate traffic; this is billed simply as an 'alternative' - we can do better. Even a BRT/light rail system would be better - and more flexible.
Now that it is supposed to go through the airport, I suppose you think tourists are going to take it half-way to Waikiki? Think again. They'd have to catch it with luggage, perhaps children, elderly, etc. in tow, stop 19 times, get to Ala Moana, grab all the luggage, etc. & then what - call a cab?
This is insanity... please consider how to better spend our tax dollars. You're planning to give the bulk of the money to a mainland company who is going to bring in mainland employees. Yes, they'll spend money, but the bulk of it won't stay here. You can build cheap (that's an oxymoron if I every heard one) housing in the areas surrounding the stations, but who is going to rent there with the train screaming through every 2 minutes (so they say) from 4 am to midnight? People who can't afford to live anywhere else, that's who. The same low-income, mostly low class people who get subsidized fares, housing, & food - bus riders. Would YOU live in housing next to a train, especially with neighbors like that? I have my doubts...

Anyway, I hope this project doesn't go through as it's sort of planned - we can do better. WAY better.

Sincerely yours,

JMitchell

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, 3RD FLOOR
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Phone: (808) 768-8305 • Fax: (808) 768-4730 • Internet: www.honolulu.gov

MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

May 21, 2010

RT10/09-335530

J. Mitchell
(No address or e-mail provided)

Dear J. Mitchell:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address comments regarding the above-referenced submittal:

Your comments regarding the Project are noted. Section 6.3 of the Final EIS describes the financial resources anticipated to pay for the capital costs of the Project. Capital costs, including finance charges, are expected to be fully paid for by a combination of FTA Section 5309 New Starts and FTA Section 5307 Funds from the Federal government and revenues from the County General Excise and Use Tax surcharge levied from 2007 through 2022 on Oahu.

To answer your question about the maintenance of the system, steel-wheel systems have lower long-term maintenance costs than other high-capacity, fixed guideway technologies. The steel that will be used for the Project will be compatible for use in a marine environment. Steel rail is capable of long-term operation in such an environment. For example, excursion service is still provided in Ewa using rails that are over 100 years old.

The Alternatives Screening Memorandum (DTS 2006a) recognized the visually sensitive areas in Kakaako and Downtown Honolulu, including the Chinatown, Hawaii Capital, and Thomas Square/Academy of Arts Special Design Districts. To minimize impacts on historic resources, visual aesthetics, and surface traffic, the screening process considered 15 different combinations of tunnel, at-grade, or elevated alignments between Iwilei and Ward Avenue. Five different alignments through Downtown Honolulu were advanced for further analysis in the Alternatives Analysis, including an at-grade portion along Hotel Street, a tunnel under King Street, and elevated guideways along Nimitz Highway and Queen Street.

The Alternatives Analysis Report (DTS 2006b) evaluated the alignment alternatives based on transportation and overall benefits, environmental and social impacts, and cost considerations. The report found that an at-grade alignment along Hotel Street would require the acquisition of more parcels and affect more burials than any of the other alternatives considered. The alignment with at-grade operation Downtown and a tunnel through the Capital Historic District, in addition to the environmental effects such as impacts to cultural resources, reduction of street capacity, and property acquisition requirements of the at-grade and tunnel sections, would cost more than $300 million more than the least expensive alternative.

The Project's purpose is "to provide high-capacity rapid transit" in the congested east-west travel corridor. The need for the Project includes improving corridor mobility and reliability. The at-grade alignment would not meet the Project's Purpose and Need because it could not satisfy the mobility and reliability objectives of the Project. Some of the technical considerations associated with an at-grade versus elevated alignment through Downtown Honolulu include the following:

- ***System Capacity, Speed, and Reliability**: The short, 200-foot blocks (or less) in Downtown Honolulu would permanently limit the system to two-car trains to prevent stopped trains from blocking vehicular traffic on cross-streets. Even with transit signal priority, the at-grade speeds would be slower and less reliable than an elevated guideway. Under ideal circumstances, the capacity of an at-grade system could reach 6,000 passengers per hour per direction. Based on travel forecasts, the Project will need to carry more than 9,000 passengers by the early 2020s. Moreover, the system can be readily expanded to carry over 25,000 in each direction by reducing the interval between trains (headway) to 90 seconds during the peak period. To preserve a comparable system capacity, speed, and reliability, an at-grade alignment would require a fenced, segregated right-of-way that would eliminate all obstacles to the train's passage, such as vehicular, pedestrian, or bicycle crossings.*

- ***Mixed-Traffic Conflicts**: With the planned three-minute headways, the short cycle of traffic lights would affect traffic flow and capacity of cross-streets. Furthermore, there would be no option to increase the capacity of the system by reducing the headway to 90 seconds.*

- ***Construction Impacts**: An at-grade system would consume two or more lanes of existing roadway, resulting in increased congestion or requiring that additional businesses or homes be taken to widen the roadway through Downtown. This*

would also have greater construction impacts and potentially affect cultural practices and burials to a greater extent than the placement of discrete column foundations for an elevated structure.

Because it is not feasible for an at-grade system through Downtown to move passengers rapidly and reliably without significant detrimental effects on other transportation system elements (e.g., the highway and pedestrian systems, safety, reliability, etc.), an at-grade system would have a negative system-wide impact that would reduce ridership throughout the system. The at-grade system would not meet the Project's Purpose and Need and therefore does not require additional analysis.

The City passed a transit-oriented development (TOD) Ordinance 09-4 in March 2009 in anticipation of the Project. Development in the study corridor, whether highway-oriented or TOD, will be based on market demands. Pursuant to the policy, TOD may occur in project station areas as an indirect effect of the Project. The increased mobility and accessibility that the Project will provide may also increase the desirability and value of land near stations, attracting new real estate investment nearby. Therefore, an indirect effect of the Project will be to alter development near stations by attracting higher densities than presently planned or could otherwise be developed near transit stations. If development occurs around stations, it is anticipated that City infrastructure would be improved in these areas. There is no noise impact associated with transit station locations.

As discussed in Chapter 2 of the Final EIS, the design of stations and public areas will apply Crime Prevention through Environmental Design (CPTED) principles to minimize the incidence of crime. These measures have proven effective with other systems.

As discussed previously, the financial resources anticipated to pay for the capital costs of the Project are described in Section 6.3 of the Final EIS. As shown in Table 6-1, the Project will cost about $4.6 billion in 2009 dollars and $5.5 billion in inflated dollars. Please refer to Chapter 6 of the Final EIS. As shown in Chapter 3 of the Final EIS, roadway congestion, as measured by vehicle hours of delay, will decrease 18 percent with the Project.

A Bus Rapid Transit Alternative is a variation on the Transportation System Management (TSM) Alternative that was evaluated in the Alternatives Analysis. As summarized in the Draft EIS, while the alternative has merit for cost-effectiveness, its overall system benefit would be low compared to fixed guideway transit. Light rail technology was not eliminated; however, at-grade light rail would not meet project speed and reliability requirements. Additional clarification has been included in the Final EIS.

The connection to Honolulu International Airport will benefit visitors, but the primary reason for the connection is the large concentration of employees in the area. Of the 116,000 daily fixed guideway trips, 9,900 trips are by visitors, of which 1,800 are to or from the Airport. The Airport Alternative serves major employment destinations at and near the Airport and at Pearl Harbor. As shown in Table 3-13 of the Final EIS, about 50 percent of daily transit trips either originate or end at work. In addition, there are only 10 stops between the Airport and Ala Moana Center.

Most construction workers will be local, although some specialized expertise will be brought in. The bulk of the money will be paid to people on the island. Regarding housing, as seen in other cities, the value of properties with access to transit stations is higher than for properties that are distant from the system. In addition, other development, including retail, businesses, schools, etc., could occur near transit stations. There is no anticipation that housing will be subsidized.

As stated in Section 4.10.3 of the Final EIS, the Project will cause no severe noise impacts. Moderate impacts will occur at upper floors of a few high-rise buildings (as shown in Table 4-18 in the Final EIS). With the recommended mitigation in place (sound absorbing material and wheel skirts), the noise analysis indicates that the new noise generated by the Project will be lower than the existing noise levels in most places.

The project design includes an integrated noise-blocking parapet wall at the edge of the guideway structure that extends 3 feet above the top of the rail. The parapet wall will substantially reduce ground-level noise.

Wheel skirts will increase the benefit from the parapet wall at locations above the elevation of the track. The use of sound-absorptive materials below the tracks in the areas that will experience moderate noise impacts will reduce the Project noise levels from the upper floors to below the impact level. Once the Project is operating, noise levels will be re-measured to confirm that there are no noise impacts from the Project.

The FTA and DTS appreciate your interest in the Project. The Final EIS has been issued in conjunction with the distribution of this letter. You may view the Final EIS on the Project website at www.honolulutransit.org. You may request a DVD of the Final EIS and additional content through the "Contact Us" tab on the website or by calling the Project hotline at 566-2299. Issuance of the Record of Decision under NEPA and acceptance of the Final EIS by the Governor of the State of Hawaii are the next anticipated actions and will conclude the environmental review process for this Project.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Status :	Initial Action Needed
Creation Date :	11/5/2008
Creator Affiliation :	
First Name :	Jimbo
Last Name :	Miura
Business/Organization :	
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City :	Mililani
State :	HI
Zip Code :	96789
Email :	jimbo777q@hawaii.rr.com
Telephone :	808-2237717
Telephone Extension :	
Add to Mailing List :	Both
Submission Method :	Website
Other Submission Method :	
Submission Date :	11/05/2008
Submission Content/Notes :	Pass to Mayor Hannemann, please reconsider the start of rail construction locations based on this message: The rail construction should start from the Aloha Stadium to Aloha Tower first so that people can start using this rail system as soon as possible while the rest of the system from the stadium to Kapolei is being completed. Second phase should be from Pearl City to the stadium, then from Kapolei to Pearl City. First phase, people can park at the stadium and ride the rails from there. Second phase, provide express bus to Pearl City since parking will be a problem. Being age 70, I sure would like to be alive for a portion of it to be completed and running. Mahalo, Jimbo Miura

DEPARTMENT OF TRANSPORTATION SERVICES

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT8/09-330350

Mr. Jimbo Miura
95-060 Kaulua Street
Mililani, Hawaii 96789

Dear Mr. Miura:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

As described in Section 2.5.10, Project Phasing, and further in Section 8.6.9, Construction Phasing, in the Final EIS, to support phased opening, the first construction phase must be connected to a maintenance and storage facility, which requires considerable space. No location has been identified closer to Downtown with sufficient available space to construct a maintenance and storage facility. Therefore, construction will begin between East Kapolei and Leeward Community College. The Project will be constructed in phases to accomplish the following:

- *Match the anticipated schedule for right-of-way acquisition and utility relocations.*
- *Reduce the time that each area will experience traffic and community disturbances.*

- *Allow for multiple construction contracts with smaller contract size to promote more competitive bidding.*

- *Match the rate of construction to what can be maintained with local workforce and available financial resources.*

- *Balance expenditure of funds to minimize borrowing.*

The portion of the corridor in the Ewa direction of Pearl Highlands is less developed than the areas in the Koko Head direction. Right-of-way can be obtained more quickly at the west end of the Project; therefore, overall project construction can begin earlier, resulting in lower total construction costs. Construction is planned to continue uninterrupted in the Koko Head direction from Pearl Highlands to Aloha Stadium, Kalihi, and finally to Ala Moana Center.

As portions of the Project are completed, each will be opened incrementally so that system benefits, even if limited during the initial phases, will be realized prior to completion of construction of the entire Project.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

298752

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February 6, 2009

Department of Transportation Services
City and County of Honolulu
650 South King Street, 3rd Floor
Honolulu, Hawaii, 96813

Feb 6 3 54 PM '09

Re: Honolulu High-Capacity Transit Corridor

Aloha kakou,

As a graduate student at the University of Hawai'i at Manoa, I have avidly awaited the Draft EIS for this project. As I have a B.S. in Civil Engineering, specializing in Transportation Engineering (U. Minnesota '86), along with several years of work in transportation noise analysis, I have been asked to study and comment upon this project on many occasions, and I have studied it extensively, including through field research.

I think the Draft EIS is substantially adequate and should be approved without amendments. Regarding routing, I think the Salt Lake Boulevard alternative should be chosen, with a branch line to the Honolulu airport leaving the mainline near Middle Street and Dillingham Boulevard.

The first segment constructed should be between Kapolei and Pearl City to 1) provide two potential option for the necessary vehicle maintenance and storage facility, and 2) relieve station and parking capacity problems resulting if the Pearl Highlands transit center were the 'Ewa-side terminus. Although the existing Kalihi bus garage might be an adequate place for a temporary/secondary facility, that facility would have to replaced elsewhere at considerable cost. Moreover, terminating major routes like 40 (Makaha), 42 ('Ewa Beach), and 52 (North Shore) at Middle Street and Dillingham Boulevard would inconvenience a large fraction of the rail system riders, since that location is not a major activity center or residential area. Incidentally, one major transit system that made a similar decision is Bay Area Rapid Transit (BART); its first segment was between Concord and Walnut Creek, California near a major maintenance center, and it did not extend across the Bay to San Francisco until ten years later (BART 2008, p. 1-4).

Having dispensed with these preliminaries, I would like to share research I have developed on the principal build alternative to the fixed-guideway transit line: A multi-lane elevated roadway. This was embodied by the "Managed Lane" alternative in the 2006 Alternatives Analysis, and the "EZ-Way" HOV/BRT (High-Occupancy Vehicle/Bus Rapid Transit) project proposed by Dr. Panos Prevedourous and Councilmember Ann Kobayashi in 2008, as well as the "HOT Lane" ("High-Occupancy Toll") proposal originally proposed by Dr.

Prevedourous several years ago. In addition to the disadvantages and impacts listed in the Alternatives Analysis, with which I concur, I found several serious problems which I think make a "Managed Lane" facility, whether or not including a major BRT (Bus Rapid Transit) component through urban Honolulu, Waipahu, and 'Ewa plain, impractical in this application:

- Congestion at the *Ewa* (main entrance during the a.m. peak period) end of the "EZ-Way" would determine that the overall capacity of the facility is too low to meet predicted travel demand.
- Noise impacts from a "Managed Lane" facility would be much greater than the proposed fixed-guideway transit line.
- Grade separation (i.e., "overpasses" and "underpasses") at "major intersections," as Kobayashi and Prevedourous proposed, would be costly and impractical.
- Operation of double-articulated Phileas buses is largely impractical on the proposed route, given the amount of conflicting traffic and surrounding land uses.
- Signal interconnection and synchronization would not significantly mitigate the problems with operating BRT on an at-grade alignment.
- Lack of park-and-ride facilities in the Kobayashi/Prevedourous proposal would make the proposed BRT facility much less attractive to riders than the proposed fixed-guideway transit alternative.

As the Alternatives Analysis did not address these issues, presumably because other data was deemed sufficient to support rejection of the Managed Lanes alternative, I am sharing my findings as "new information" that supports the decisions made thus far by the City and County of Honolulu. This research was conducted last year during the campaign for the rail transit charter amendment (i.e., "Amendment 4"), although much of it was not extensively publicized. In anticipation of challenges to the approval of the Final EIS on the grounds that the Managed Lanes alternative was improperly rejected during the Alternatives Analysis stage, I hereby present a summary of my findings, in brief. If you would like to examine my research more closely, I will be happy to supply whatever I can.

Entrance ramp congestion

In his original proposal, expressed in the document he released entitled "Effective Traffic Relief for Oahu: HOT Expressway and Underpasses," Dr. Prevedourous proposed funneling traffic from four roads: H-1, H-2, Farrington Hwy., and Kamehameha Hwy. (from Mililani) into three HOV/HOT lanes, all merging within scarcely 1,000 feet. Given this short spacing of merge points, I calculate that the actual capacity at this point would be 4,180 PCE (Passenger Car-Equivalent)/hr. at LOS C or 2,890 PCE/hr. at LOS B. At LOS E—the absolute maximum—the capacity would be 6,150 PCE/hr. This table describes conditions at the facility entrance:

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	LOS B (60 mph+)	LOS C (approx. 55 mph)	LOS E/F (30 mph to zero)
Buses (PCE)	186	186	186
HOV users	2,444	2,444	2,444
HOT users (%SOV users)	260 (1.2%)	1,550 (6.9%)	3,520 (15.6%)
Total	2,890 PCE/hr. (47% capacity)	4,180 PCE/hr. (68% capacity)	6,150 PCE/hr. (max. capacity)

The capacity of three lanes at LOS E/F would be the same regardless of interchange spacing because traffic would no longer be moving freely. Therefore:

- At the service quality promised by Prevedourous, only 1-7% of all motorists driving alone on H-1 could enjoy the HOT facility—at any price! A true "Lexus Lane."
- If operated at the speed promised by Prevedourous ("60 mph"), traffic on the HOV/HOT facility would constantly exceed 55 mph, since the maximum LOS C volume at the entrance junction is LOS B volume on the mainline! Therefore, accidents would be frequent and often severe at the terminus, and at sharper curves. While operation at LOS E would be relatively safe, that would erase the speed/time advantage that Prevedourous promises.
- Finally, entry delays to the HOV/HOT facility would consume much of the time advantage of using the facility; delays due to accidents and breakdowns would often erase all time savings.

Although the intermediate exits (in the a.m. direction) that Dr. Prevedourous proposes would help relieve exit-end congestion, they would do nothing to relieve congestion at the entrance to the HOV/HOT facility. Intermediate entrances would only create additional merge points, adding more traffic to a roadway that would regularly operate at high capacity. Finally, these additional ramps would increase the cost of HOV/HOT facility to equal or more than a fixed-guideway transit line.

The "EZ-Way" plan makes the poor design by Dr. Prevedourous impractical. Kobayashi and Prevedourous proposed to allow anyone driving a car with a "33 mpg" or higher fuel efficiency to use the elevated lanes, even if they are the only vehicle occupant. Second, the "EZ-Way" dedicated one lane to guided buses, evidently leaving only two lanes for all carpool, vanpool, single-occupancy vehicle, motorcycle, and non-guided bus traffic. Since the table above shows that a three-lane HOV facility is inadequate for serving travel demand between Pearl City and Downtown, a two-lane HOV/SOV facility is obviously inadvisable.

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Relative noise impact

For all that has been said about the noise impacts from rail transit, little information has been made available about the noise impacts from an elevated high-speed roadway. Using Federal Transit Administration methods, the adjacent table shows that any elevated high-speed roadway between Waipahu and Downtown would subject adjacent persons to much more noise than the proposed fixed-guideway transit line. The difference would be especially noticeable where the roadway leaves the H-1 alignment: Along Kamehameha Highway through Pearl City and Aiea, and along Nimitz Highway through Kalihi, Kapalama, and Iwilei.

EZ-Way (2008)	Hourly L_{eq} at 50 feet
93 express buses/hr.	69 dBA
2,474 HOV and SOV veh./hr.	76 dBA
TOTAL:	**77 dBA**
Original HOT Lane proposal	Hourly L_{eq} at 50 feet
93 express buses/hr.	69 dBA
3,994 HOV and SOV veh./hr.	78 dBA
TOTAL:	**79 dBA**
Automated Light Rail Transit	Hourly L_{eq} at 50 feet
40 two-car trains/hr.	**65 dBA**
40 three-car trains/hr.	**67 dBA**

In addition, peak noise levels (L_{max}) from passing buses would be noticeably louder than the proposed rail transit trains. For example, the peak noise level from an internal-combustion-powered (e.g., diesel-powered) bus passing by at 60 mph is 91 dBA (decibel, A-weighted) at 50 feet. By comparison, the absolute peak noise level from a rail car passing by at 50 mph is only 82 dBA at the same distance. In regards to the experience of a passenger standing next to a bus or train departing a station, the maximum noise level heard by an adjacent pedestrian (i.e., much closer than 50 feet) from a diesel-powered bus has been measured at 84 dBA, while that for a rail transit passenger was only 75 dBA (Gershon, et al. 6).

Although electrically powered buses would be about 10 dBA quieter (Rossa and Staiano 2007)—i.e., about as loud as an electrically-powered rail car—the cost, visual impact, and route-inflexibility of using *two* overhead wires (one for power, the other for ground) all militate toward simply choosing automated light rail trains. Advanced batteries, fuel cells, flywheels, and other exotic alternatives are relatively expensive and untested.

In addition, since electric buses consume more electricity than electric rail vehicles, largely due to the higher friction of rubber tires compared to steel wheels, resorting to electric buses obviates claims that rail transit will require construction of additional electricity generation capacity. However, I have independently confirmed that this is a canard, and the actual peak power demand will be about 18 megawatts, as stated in the Draft EIS.

Moreover, these predicted noise levels neglect the potential for noise mitigation techniques. As you have amply explained elsewhere, noise mitigation for rail transit is considerably more practical and efficient than when trying to shield noise from diesel-powered buses and automobiles.

Trackless Trains in urban and suburban areas.

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A "Phileas" double-articulated bus is about 85 feet long (Advanced Public Transport Systems 2008). This is longer than most light-rail vehicles, and comparable to the double-articulated light-rail vehicles built for the Seattle light rail line that is now nearly complete. First, because the tires of a guided bus contact the exact same pavement every time it passes a particular point, the pavement along the entire route must be intensively reinforced, as even the manufacturer of the Phileas system admits (Van der Spek and Splint 33). The cost of reinforcing the pavement will be much higher than the cost of installing permanent magnets or other guidance technology into the roadway.

More important operationally, a Phileas "bus" is a "trackless train," and its impacts on traffic are approximate to that of a light rail vehicle on at-grade right-of-way. Providing an exclusive bus lane on Farrington Highway and Fort Weaver Road, as proposed in the "EZ-Way" plan, would require removing parking and/or driving lanes from those roads, which would likely raise opposition from local merchants and residents, who would receive relatively little benefit from express buses making infrequent stops. In addition, conflicts with vehicles turning *across* the BRT lanes, or even *stopping* on the lanes to turn into traffic, would be a serious hindrance to transit operations, given that the Alternatives Analysis predicted a need for up to 93 buses per hour in the a.m. peak-hour direction, or one bus every 39 seconds.

At every station stop, a Phileas bus would block off nearly 90 feet of road to any turning vehicle, even if the station platform was much shorter. Whether in suburban areas like Waipahu, or urban areas like Makiki, maintaining access to businesses near a bus stop—most often a corner business—would be difficult or impossible. Providing safe and convenient pedestrian, bicycle, wheelchair, and other access to a mid-street and even mid-block station poses major engineering and security challenges.

In comparison to the proposed fixed-guideway alternative, the "EZ-Way" plan does not mention including any "park-and-ride" facilities. Without park-and-ride lots, the Kobayashi BRT plan is much *less* accessible to local residents than the rail line would be; if every rider must either walk, bicycle, ride a bus, or be dropped off by a motorist at a station, the guided bus is truly a "trackless train." As explained above, because of their operational requirements, as well as their great length, the Phileas buses can *not* be driven off their prepared route into local neighborhoods.

Lastly, grade-separating intersections, as Kobayashi and Prevedourous proposed, would raise many problems, including:

- Reduced lane width on lanes adjacent to transition points between at-grade and elevated segments, i.e, "ramps."
- Lost access to streets and driveways by motorists *and* pedestrians at all transition points along ramps.
- Increased noise impacts (probably severe), energy demand, and brake dust emissions at all ramps.
- Significantly increased cost, especially for underpasses, at many locations near the ocean or a stream, e.g., along Nimitz Boulevard.

A Phileas bus is 8.4 feet wide, similar to a conventional transit bus. Besides two feet between the two bus lanes (necessary to prevent the side-mounted rear-view mirrors from

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colliding, at minimum), two feet should be provided at the base of the wall for reaction space and a drainage gutter along the conventional driving lanes. Since the width of two retaining walls must be much greater than eight inches each, about three 10-12 foot lanes must be removed or narrowed from the street below wherever the Phileas bus route climbs over an intersecting street. Kobayashi's claim that her solution will have "ZERO" impact on downtown streets (p. 9) is unsupportable.

Furthermore, these ramps will run over 500 feet on either side of the intersecting street. An underpass must drop about 16 feet below grade (a transit bus is 11 feet high); descending at 3% will require 533 feet on either side of the street. Although as steeper grade is feasible—albeit leading to greater noise and other impacts—the Phileas double-articulated design requires that the vertical curve must be limited, so 3% is a good planning figure. Moreover, at least 20 feet of rise must be achieved at overpasses; 667 feet will be required for a 3% grade. Thus allowing for the width of intersecting street being bypassed, the total combination of ramps and bridges will be 1200 to 1500 feet in length.

Signal synchronization

From my experience studying the extensive interconnected signal system in St. Paul, Minnesota for the Minnesota Department of Transportation (Mn/DOT), I have found that signal interconnection works best on one-way streets with minimum turning onto and off the road. Two way roads are only amenable to signal interconnection if cross streets are evenly-spaced.

In comparison to the St. Paul city street system, Honolulu is not a grid or even rectangular. Moreover, all any signal-controlling computer can do is optimize traffic flow. With heavy traffic, especially left-turning traffic and mid-block entries, along with heavy pedestrian traffic, severe congestion will develop.

Conclusion: No at-grade solution will provide sufficiently reliable service to attract as many drivers from their cars as grade-separated rail transit in the Honolulu-Kapolei corridor. Consequently, the Draft EIS should be approved immediately, and the proposed fixed guideway transit system should be constructed as soon as funds and other resources allow.

Sincerely,

Hannah Miyamoto

Hannah Miyamoto, B.S.C.E., J.D., M.S.

AR00002584

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DEPUTY DIRECTOR

June 11, 2010

RT2/09-298752R

Ms. Hannah S. Miyamoto
2424 Maile Way, Saunders Hall 247
Honolulu, Hawaii 96822

Dear Ms. Miyamoto:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

Your preference for the Salt Lake Alternative has been noted. While each of the alternatives discussed in the Draft EIS includes trade-offs between benefits and impacts, the Airport Alternative from East Kapolei to Ala Moana has been identified as the Preferred Alternative as described above. As compared to the other alternatives discussed in the Draft EIS, the Airport Alternative will carry the most passengers, provide the greatest transit-user benefits, and result in the fewest vehicle hours of delay. It will provide access to employment centers at Pearl Harbor Naval Base and Honolulu International Airport and will serve the Salt Lake neighborhood with connecting bus service. Of the three Build Alternatives addressed in the Draft EIS, the Airport Alternative will have slightly lower impacts to the natural and built environment. During the public comment period on the Draft EIS, the public overwhelmingly supported the Airport Alternative. Of the comments that specifically supported one of the

alternatives, more than 75 percent were in support of the Airport Alternative.

The Alternatives Analysis phase, which preceded the EIS process, is documented in Chapter 2 of the Final EIS. It evaluated a range of modal and general alignment alternatives, in terms of their costs, benefits, and impacts. The scoping process for the Alternatives Analysis involved a presentation of the viable alternatives to the public and interested public agencies and officials to receive comments on the Purpose and Need, alternatives, and scope of the analysis. Scoping for the EIS followed the FTA process that provides for a culling of alternatives studied in the EIS through an Alternatives Analysis. The scoping process initiated for the Alternatives Analysis included a variety of highway, bus and fixed guideway options for consideration. During the later scoping effort for the EIS, the public was requested to propose alternatives that would satisfy the purpose and need at less cost or with greater effectiveness, less environmental or community impact and to propose alternatives that were not previously studied and eliminated for good cause. The only alternative that emerged that met these criteria was a fixed-guideway alternative following several alternative alignments. All reasonable alternatives that emerged from these processes were ultimately evaluated in the Draft and Final EISs.

Since publication of the Draft EIS, design has been advanced, further analysis has been completed, and information has been added in response to comments on the Draft EIS and agency coordination. The Final EIS discusses the process that was used to select the Preferred Alternative, how comments were considered in the decision-making process, impacts, and mitigation commitments.

As described in Section 2.5.10, Project Phasing, and further in Section 8.6.9, Construction Phasing, in the Final EIS, to support phased opening, the first construction phase must be connected to a maintenance and storage facility, which requires considerable space. No location has been identified closer to Downtown with sufficient available space to construct a maintenance and storage facility. Therefore, construction will begin between East Kapolei and Leeward Community College. The Project will be constructed in phases to accomplish the following:

- *Match the anticipated schedule for right-of-way acquisition and utility relocations.*
- *Reduce the time that each area will experience traffic and community disturbances.*
- *Allow for multiple construction contracts with smaller contract size to promote more competitive bidding.*
- *Match the rate of construction to what can be maintained with local workforce and available financial resources.*
- *Balance expenditure of funds to minimize borrowing.*

The portion of the corridor in the Ewa direction of Pearl Highlands is less developed than the areas in the Koko Head direction. Right-of-way can be obtained more quickly at the west

end of the Project; therefore, overall project construction can begin earlier, resulting in lower total construction costs. Construction is planned to continue uninterrupted in the Koko Head direction from Pearl Highlands to Aloha Stadium, Kalihi, and finally to Ala Moana Center.

As portions of the Project are completed, each will be opened incrementally so that system benefits, even if limited during the initial phases, will be realized prior to completion of construction of the entire Project.

Your comments about the Managed Lane Alternative have been noted.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Status :	In Process
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Submission Method :	Website
Other Submission Method :	
Submission Date :	11/03/2008
Submission Content/Notes :	Suggestion: To help pay for the maintenance of the rail..Sell advertisement..billboard type that can be put on the outside of the trains also at the train stations. Also, put in flat screen monitors inside ot the train and sell commercial time and also Public announcements such as "Sunset at the beach, Taste of Honolulu, Blood Drive, Toys for Tots, UH Football information". Also, private industry can place their commerical time. You have the consumer's complete attention on the train for 30 to 45 minutes. Maybe even free wi-fi. Lot of potential this TRAIN system!! Lot of new businesses will be good around the train station! Aloha

DEPARTMENT OF TRANSPORTATION SERVICES

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MUFI HANNEMANN
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DEPUTY DIRECTOR

June 11, 2010

RT8/09-330316

Mr. Darin Miyashiro
mdarin@gmail.com

Dear Mr. Miyashiro:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraph addresses your comments regarding the above-referenced submittal:

The idea of using advertisements and billboards to help pay for the maintenance of the rail system has been discussed as possibilities to supplement operating revenue. As noted in Section 6.6.4 of the Final EIS, the City currently receives a small amount of transit-related advertising revenues annually. These ideas to supplement operating revenue will be considered. It will then be the City Council's decision to review current policy toward advertising once it is weighed against other considerations.

The FTA and DTS appreciate your interest in the Project. The Final EIS has been issued in conjunction with the distribution of this letter. You may view the Final EIS on the Project website at www.honolulutransit.org. You may request a DVD of the Final EIS and additional content through the "Contact Us" tab on the website or by calling the Project hotline at 566-2299. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Status :	Initial Action Needed
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State :	HI
Zip Code :	96817
Email :	mongold@hawaii.edu
Telephone :	524-1104
Telephone Extension :	
Add to Mailing List :	Standard
Submission Method :	Website
Other Submission Method :	
Submission Date :	12/15/2008
Submission Content/Notes :	I support the project. I prefer the airport route.

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, 3RD FLOOR
HONOLULU, HAWAII 96813
Phone: (808) 768-8305 • Fax: (808) 768-4730 • Internet: www.honolulu.gov

MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010 RT9/09-331969

Mr. David Mongold
60 North Beretania Street
Apartment 1502
Honolulu, Hawaii 96817

Dear Mr. Mongold:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall indentify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraph addresses your comments regarding the above-referenced submittal:

Your preference for the Airport Alternative has been noted. While each of the alternatives discussed in the Draft EIS includes trade-offs between benefits and impacts, the Airport Alternative from East Kapolei to Ala Moana has been selected as the Preferred Alternative as described above. As compared to the alternatives discussed in the Draft EIS, the Airport Alternative will carry the most passengers, provide the greatest transit-user benefits, and result in the fewest vehicle hours of delay. It will provide access to employment centers at Pearl Harbor Naval Base and Honolulu International Airport and will serve the Salt Lake neighborhood with connecting bus service. Of the three Build Alternatives addressed in the Draft EIS, the Airport Alternative will have slightly less impacts to the natural and built environment analyzed in the Draft EIS. During the public comment period on the Draft EIS, the public overwhelmingly

supported the Airport Alternative. Of the comments that specifically supported one of the alternatives, more than 75 percent were in support of the Airport Alternative. For more information this selection is discussed in Section 2.4 of the Final EIS. Since publication of the Draft EIS, design has been advanced, further analysis has been completed, and information has been added in response to comments on the Draft EIS and agency coordination. The Final EIS discusses the process that was used to select the Preferred Alternative, how comments were considered in the decision-making process, impacts and mitigation commitments.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
Creation Date :	12/8/2008
Creator Affiliation :	
First Name :	Kathleen
Last Name :	Moore
Business/Organization :	
Address :	45-556 Mahinui Raod
Alternative Preference :	
Apt./Suite No. :	
City :	Kaneohe
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Zip Code :	96744
Email :	moorej011@hawaii.rr.com
Telephone :	235-8041
Telephone Extension :	
Add to Mailing List :	Both
Submission Method :	Website
Other Submission Method :	
Submission Date :	12/08/2008
Submission Content/Notes :	Honolulu Transit,

I would like to support building the first segment from Pearl City to Downtown. If an elevated base yard could be put over the lower Aloha Stadium parking lot, maybe the proposal could work and we could get significant traffic relief much earlier. It could be a temporary base yard till the build out is completed and then a park and ride.

With the economy in the tank, businesses and property owners may be more inclined to cooperate. The right of way would be cheaper in a down economy. Businesses would recover faster with the rail going by earlier.

Please think about this option seriously. I believe this option provides the best benefit to the citizens of Honolulu. If the economy goes into a depression, this may be the only segment completed for many years.

Kathleen Moore
Urban Planner

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010 RT9/09-331312

Ms. Kathleen Moore
45-556 Mahinui Road
Kaneohe, Hawaii 96744

Dear Ms. Moore:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall indentify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

As described in Section 2.5.10, Project Phasing, and further in Section 8.6.9, Construction Phasing, in the Final EIS, to support phased opening, the first construction phase must be connected to a maintenance and storage facility, which requires considerable space. No location has been identified closer to Downtown with sufficient available space to construct a maintenance and storage facility. Therefore, construction will begin between East Kapolei and Leeward Community College. The Project will be constructed in phases to accomplish the following:

- *Match the anticipated schedule for right-of-way acquisition and utility relocations.*
- *Reduce the time that each area will experience traffic and community disturbances.*
- *Allow for multiple construction contracts with smaller contract size to promote more competitive bidding.*

- *Match the rate of construction to what can be maintained with local workforce and available financial resources.*

- *Balance expenditure of funds to minimize borrowing.*

The portion of the corridor in the Ewa direction of Pearl Highlands is less developed than the areas in the Koko Head direction. Right-of-way can be obtained more quickly at the west end of the Project; therefore, overall project construction can begin earlier, resulting in lower total construction costs. Construction is planned to continue uninterrupted in the Koko Head direction from Pearl Highlands to Aloha Stadium, Kalihi, and finally to Ala Moana Center.

As portions of the Project are completed, each will be opened incrementally so that system benefits, even if limited during the initial phases, will be realized prior to completion of construction of the entire Project.

Section 2.5.8 of the Final EIS addresses the maintenance and storage facility. The two potential locations for the maintenance and storage facility are detailed in Figures 2-38 and 2-39. Either of these sites will require less relocation and will have fewer property impacts then a maintenance facility in a developed urban area such as Downtown Honolulu. Construction methodologies in these less-developed areas can be refined more easily to reduce impacts to the natural and built environments. As also discussed in Chapter 2 of the Final EIS, park-and-ride lots are planned at East Kapolei, UH West Oahu, Pearl Highlands, and Aloha Stadium. These stations have been identified as having the highest demand for drive-to-transit access.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
Creation Date :	11/20/2008
Creator Affiliation :	
First Name :	Richard
Last Name :	Mori
Business/Organization :	
Address :	94 742 Kaaka Street
Apt./Suite No. :	
City :	Waipahu
State :	HI
Zip Code :	96797
Email :	supa8hi@gmail.com
Telephone :	
Telephone Extension :	
Add to Mailing List :	Both
Submission Method :	Website
Other Submission Method :	
Submission Date :	11/20/2008
Submission Content/Notes :	In the DEIS it indicates that the rail will have drivers in the trains. They should be fully automated to save on Operations and Maintenance. This will only cost more in overall operations and the City will have to find new funding sources if you keep adding more overhead to the project.

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

RT9/09-330578

May 21, 2010

Mr. Richard Mori
94-742 Kaaka Street
Waipahu, Hawaii 96797

Dear Mr. Mori:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraph addresses comments regarding the above-referenced submittal:

As discussed in Section 2.5 of the Final EIS, the system is designed so vehicles could either be manually operated by a driver or fully automated (driverless). Your comment regarding having fully automated trains is noted.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Issuance of the Record of Decision under NEPA and acceptance of the Final EIS by the Governor of the State of Hawaii are the next anticipated actions and will conclude the environmental review process for this Project.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
Creation Date :	12/9/2008
Creator Affiliation :	
First Name :	Richard
Last Name :	Mori
Business/Organization :	
Address :	94-742 Kaaka Street
Alternative Preference :	
Apt./Suite No. :	
City :	Waipahu
State :	HI
Zip Code :	96797
Email :	
Telephone :	
Telephone Extension :	
Add to Mailing List :	Standard
Submission Method :	Website
Other Submission Method :	
Submission Date :	12/09/2008
Submission Content/Notes :	The Rail stations at a minimum should be prewired for video surveillance, emergency pull boxes and future solar panels to seve on installation costs later. Preplanning ahead of time will save the taxpayers money in the long run.

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/090-331584

Mr. Richard Mori
94-742 Kaaka Street
Waipahu, Hawaii 96797

Dear Mr. Mori:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall indentify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

As discussed in the Final EIS Section 2.5.4 Safety and Security Measures, a project-specific Safety and Security Management Plan has been developed in accordance with FTA requirements to define the safety and security activities and methods for identifying, evaluating, and resolving potential safety hazards and security vulnerabilities of the system. It establishes responsibility and accountability for safety and security during the Preliminary Engineering, Final Design, construction, testing, and start-up phases of the Project. The Honolulu Police Department, the Honolulu Fire Department, the Honolulu Department of Emergency Management, and the Honolulu Emergency Services Department have been involved in preparing and will be part of implementing the plan. The plan addresses public safety and security concerns, including threats and hazards associated with the Project, specific issues that were identified through community outreach efforts, and design and architectural details to

enhance safety.

The integration of solar panels is still being evaluated.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
Creation Date :	2/3/2009
Creator Affiliation :	
First Name :	Richard
Last Name :	Mori
Business/Organization :	
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Alternative Preference :	
Apt./Suite No. :	
City :	Waipahu
State :	HI
Zip Code :	96797
Email :	morir00@hawaii.rr.com
Telephone :	
Telephone Extension :	
Add to Mailing List :	None
Submission Method :	Website
Other Submission Method :	
Submission Date :	02/03/2009

Submission Content/Notes : The so called "experts" who dismissed Maglev by stating: ("none of the proprietary technologies offered substantial proven performance, cost, and reliability benefits compared to steel wheel operating on steel rail.") are dooming the people of HAWAII to an inferior more expensive system. Allowed to compete and bid the MAGLEV would offer: 1. Less construction costs due to the concrete work being approximately 25% less and construction time would be sped up. The smaller guideway (21 feet versus 31 feet wide for steel) would result in a savings of over HALF A BILLION DOLLARS. 2. As shown in the DEIS O&M costs the MAGLEV also excels as there is nothing to wear out compared to steel. With the steel (YOE) dollars for O & M costs of $133 Million/year, assuming a 25% savings; over 30 years the cost saving in O & M is approximately 1 BILLION DOLLARS!!!. All the cost savings could be used to complete the whole system from Kapolei to UH Manoa. 3. The noise level for MAGLEV is also 3.5 times less (62 dba versus 80 DBA for steel), This would have less impact on the adjacent residents to the rail line and would preclude the need of additional costs for noise walls along the route. The steel system would have to be in compliance with the HRS. This would be an eyesore and would be a magnet for grafitti. With successful commercial operation in Nagoya Japan with no accidents which compare to the 6 steel accidents on the mainland in the past 8 months. 4. Safety is of upmost importance; due to the wrap around design there is no chance for derailment as oppossed to steel. Steel would require drivers further adding to the costs to our taxpayers that are already paying the highest in the nation. MAGLEV would be completely automated. Finally the superior hill climbing ability of MAGLEV is vastly superior to steel. I WANT THE BEST RAIL SYSTEM FOR THIS SPECIAL PLACE WE CALL HAWAII. I JUST HOPE THAT YOU DO TOO!!!

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-334432

Mr. Richard Mori
94-742 Kaaka Street
Waipahu, Hawaii 96797

Dear Mr. Mori:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

Your comments have been noted. As stated in Section 2.2.3 of this Final EIS, the NEPA Notice of Intent requested input on five transit technologies. A technical review process included the opportunity for public comment and was used in parallel with the alternatives analysis to select a transit technology. The process included a broad request for information that was publicized to the transit industry. Transit vehicle manufacturers submitted 12 responses covering all of the technologies listed in the Notice of Intent. An independent five-member technology panel composed of four transit experts and a transportation academic appointed by the City Council evaluated guided rubber-tire-on-concrete systems (e.g., Phileas bus system and VAL-type systems), monorail (which is a variation on rubber-tyred technology), steel-wheel-on-steel-rail systems, (e.g., light rail and rapid rail), and magnetic levitation (MAGLEV) . The

panel considered the performance, cost, and reliability of the proposed technologies.

Proprietary technologies, meaning those technologies that would have required all future purchases of vehicles or equipment to be from a single manufacturer, were eliminated because none of the proprietary technologies offered substantial proven performance, cost, and reliability benefits compared to steel wheel operating on steel rail.

The panel accepted public comment twice as part of its review. By a four-to-one vote, the panel chose a steel wheel vehicle operating on steel rail system because it was considered safe, reliable, economical, and non-proprietary. Those results are documented in the panel's report to the City Council dated February 22, 2008 entitled "Independent Technology Selection Panel Report".

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Dear Mr. Matley:

The draft Environmental Impact Statement for the City and County of Honolulu rail transit project is unacceptable because it is written solely for a steel wheel on steel rail system. There are other forms of fixed rail that may be better and more cost-effective than steel wheels. Please have the City rewrite this EIS to cover the other technologies, such as monorail and maglev, to ensure that our taxpayers will obtain the best transit system at the best price.

The so called "experts" who dismissed Maglev by stating: ("none of the proprietary technologies offered substantial proven performance, cost, and reliability benefits compared to steel wheel operating on steel rail.") are dooming the people of HAWAII to an inferior more expensive system. Allowed to compete and bid the MAGLEV would offer:

1. Less construction costs due to the concrete work being approximately 25% less and construction time would be sped up. The smaller guideway (21 feet versus 31 feet wide for steel) would result in a savings of over HALF A BILLION DOLLARS.

2. As shown in the DEIS O&M costs the MAGLEV also excels as there is nothing to wear out compared to steel. With the steel (YOE) dollars for O & M costs of $133 Million/year, assuming a 25% savings; over 30 years the cost saving in O & M is approximately 1 BILLION DOLLARS!!!.

3. The noise level for MAGLEV is also 3.5 times less (62 dba versus 80 DBA for steel), This would have less impact on the adjacent residents to the rail line and would preclude the need of additional costs for noise walls along the route. The steel system would have to be in compliance with the HRS. This would be an eyesore and would be a magnet for grafitti. With successful commercial operation in Nagoya Japan with no accidents which compare to the 6 steel accidents on the mainland in the past 8 months. Just yesterday (2/2/2009) 100 people were injured in the BART steel system on the mainland.

4. Safety is of upmost importance; due to the wrap around design there is no chance for derailment as oppossed to steel. Steel would require drivers further adding to the costs to our taxpayers that are already paying the highest in the nation. MAGLEV would be completely automated. Finally the superior hill climbing ability of MAGLEV is vastly superior to steel. I WANT THE BEST RAIL SYSTEM FOR THIS SPECIAL PLACE WE CALL HAWAII. I JUST HOPE THAT YOU DO TOO!!! Thank you very much for your time.

Sincerely,
Richard Mori
94-742 Kaaka Street
Waipahu, Hawaii 96797

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-334460

Mr. Richard Mori
94-742 Kaaka Street
Waipahu, Hawaii 96797

Dear Mr. Mori:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

As noted in Chapter 2 of the Final EIS, in parallel with the alignment analysis, a five-member panel appointed by the City Council and the Mayor considered the performance, cost, and reliability of the five proposed technologies for the fixed guideway system. The panel twice accepted public comment as part of this review. By a four-to-one vote, the panel selected steel wheel operating on steel rail as the technology for the Project evaluated in the Final EIS. The four panel members selected steel-wheel technology because it is mature, proven, safe, reliable, economical, and non-proprietary. Proprietary technologies, meaning those technologies that would have required all future purchases of vehicles or equipment to be from a single manufacturer, were eliminated because none of the proprietary technologies offered substantial proven performance, cost, and reliability benefits compared to steel wheel operating on steel rail.

Selecting a proprietary technology also would have precluded a competitive bidding process, likely resulting in increased overall project costs.

No comparative Maglev project has ever been built within the U.S. Therefore, there is no data available to support a lower-cost estimate. Some of the savings recognized in other countries for beam-track vehicles would not apply in the U.S. because of requirements to include an emergency egress walkway. In addition, the smaller-width structures proposed in the comment result in shorter span-lengths, which increases the number of columns required and the cost to construct both the additional foundations and the columns.

The HSSTsystem operators have declined to make operating expenses available; therefore, with no comparative data available to support an operating cost estimate, there is no means to verify this statement.

While the system is inherently quieter, other systems may be designed to match the noise level of magnetic levitation when in operation. There is no specific safety improvement from the traction design. The assumed visual benefits for beam-track vehicles would not apply in the U.S. because of requirements to include an emergency egress walkway.

There is no specific safety improvement from the traction design. Loss of levitation force results in the vehicle dropping to the track which results in wear or damage to safety systems. A steel-wheel system would not require an operator any more than a magnetic levitation system would. The Project does not include any grades too steep for steel wheel systems.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
Creation Date :	12/9/2008
Creator Affiliation :	
First Name :	Maurice
Last Name :	Morita
Business/Organization :	Neighborhood Board #18
Address :	1142 Ala Aloalo Street
Alternative Preference :	
Apt./Suite No. :	
City :	Honolulu
State :	HI
Zip Code :	96818
Email :	mmorita@hsta.org
Telephone :	808-225-0326
Telephone Extension :	
Add to Mailing List :	Both
Submission Method :	Website
Other Submission Method :	
Submission Date :	12/09/2008
Submission Content/Notes :	I am in favor of the Salt Lake rail route instead of the airport route. Keeping the Salt Lake route will cost less rather than going to the airport. The spur to the airport from Salt Lake will cost less than if there was a spur from the airport to Salt Lake. The airport route should be considered when the decision to spur to Waikiki is made. If the purpose is to help relief traffic from Leeward and Central Oahu, there is more population density in the Salt Lake area vs. the airport which is mostly commercial and military which would help with the traffic congestion we have now. With the economy in recession, the cost should be considered when making the final decision as to the rail route. This is why I am in favor of keeping the Salt Lake rail route.

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-331588

Mr. Maurice Morita
1142 Ala Aloalo Street
Honolulu, Hawaii 96818

Dear Mr. Morita:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

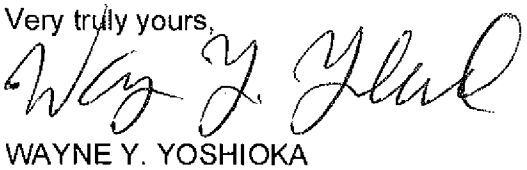
The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall indentify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraph addresses your comments regarding the above-referenced submittal:

Your preference for the Salt Lake Alternative has been noted. While each of the alternatives discussed in the Draft EIS includes trade-offs between benefits and impacts, the Airport Alternative from East Kapolei to Ala Moana has been selected as the Preferred Alternative as described above. As compared to the alternatives discussed in the Draft EIS, the Airport Alternative will carry the most passengers, provide the greatest transit-user benefits, and result in the fewest vehicle hours of delay. It will provide access to employment centers at Pearl Harbor Naval Base and Honolulu International Airport and will serve the Salt Lake neighborhood with connecting bus service. Of the three Build Alternatives addressed in the Draft EIS, the Airport Alternative will have slightly less impacts to the natural and built environment analyzed in the Draft EIS. During the public comment period on the Draft EIS, the public overwhelmingly supported the Airport Alternative. Of the comments that specifically supported one of the

alternatives, more than 75 percent were in support of the Airport Alternative. For more information this selection is discussed in Section 2.4 of the Final EIS. Since publication of the Draft EIS, design has been advanced, further analysis has been completed, and information has been added in response to comments on the Draft EIS and agency coordination. The Final EIS discusses the process that was used to select the Preferred Alternative, how comments were considered in the decision-making process, impacts and mitigation commitments.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,



WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	In Process
Record Date :	11/2/2008
First Name :	Dale
Last Name :	Moyen
Business/Organization :	
Address :	
Apt./Suite No. :	
City :	
State :	HI
Zip Code :	96707
Email :	moyen@hawaii.rr.com
Telephone :	
Telephone Extension :	
Add to Mailing List :	Email
Submission Method :	Website
Submission Content/Notes :	One of the things we should emphasize if the Hot Lanes / EZ-Way will have a much bigger overhead visual impact, be a larger / wider structure, be much nosier with constant noise (not just when a train goes by), and be much more polluting. The toll road will also put more cars on the roads and those cars have to go back onto to surface streets at the end of the toll road, thus INCREASING traffic downtown. Also, the proposed "variable toll" for the Hot Lanes is ridiculous. The worse the traffic, the higher the toll? And a private company will set the tolls - hmmm, now what will their motivation be? To charge the highest price the traffic will bear - BAD PLAN! This needs to be brought to the public's attention ASAP. The Hot Lane's representative during the last debate said that "there will always be someone to pay a price to beat the traffic". To maintain the 3,000 vehicles per hour flow on the Hot Lanes, they will raise the toll depending on how bad the traffic is on H-1. So on heavy traffic days or when there is an accident on H-1 they can raise the toll from $3 each way to $5 or even $7. Predatory pricing for the Hot Lanes. GO RAIL GO!

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, 3RD FLOOR
HONOLULU, HAWAII 96813
Phone: (808) 768-8305 • Fax: (808) 768-4730 • Internet: www.honolulu.gov

MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

May 21, 2010

RT8/09-330339

Mr. Dale Moyen
moyen@hawaii.rr.com

Dear Mr. Moyen:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following statement addresses comments regarding the above-referenced submittal:

Your comments regarding HOT lanes and the EZ Way proposal are noted.

The FTA and DTS appreciate your interest in the Project. The Final EIS has been issued in conjunction with the distribution of this letter. You may view the Final EIS on the Project website at www.honolulutransit.org. You may request a DVD of the Final EIS and additional content through the "Contact Us" tab on the website or by calling the Project hotline at 566-2299. Issuance of the Record of Decision under NEPA and acceptance of the Final EIS by the Governor of the State of Hawaii are the next anticipated actions and will conclude the environmental review process for this Project.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Honolulu High-Capacity Transit Corridor Project

Welcome to the Honolulu High-Capacity Transit Corridor Project's Public Hearing for the Draft Environmental Impact Statement/Section 4(f) Evaluation.

This public meeting and hearing has been designed to inform the public about the transit project, explain materials contained in the Draft EIS, answer questions from the public, and collect public input on project issues related to the Draft EIS, Section 106 of the National Historic Preservation Act, Section 4(f) of the U.S. Department of Transportation Act, and floodplains affected by the project.

Please review the project information and ask project staff any questions about the project that you might have. The Draft EIS is available on the project website at www.honolulutransit.org.

You may provide official comments in several ways. Here at this Public Hearing you may provide oral comments to a court reporter who will record them for the record or use this form to provide written comments. After the meeting, you may provide an on-line comment at www.honolulutransit.org or use this form to send a written comment to the Department of Transportation Services. All comments must be postmarked or received by January 7, 2009 in order for them to be included in the Final EIS.

Name: DAISY MURAY Address: 3034 Kaunaoa PL

Honolulu HI 96815

Phone: _____

E-mail: _____

Comment(s):

An elevated (30-120 feet) RAIL TRANSIT system for Oahu will be difficult + board + exit for passengers with difficulty in walking - the senior citizens/handicapped/wheelchaired. It will also be very difficult for passengers who are deadly afraid of heights. I know 2 persons who have this phobia, and have seen them go through a very nerve wrecking experience of hugging the wall walk very slowly with their eyes closed. Imagine if passengers with this phobia need to ride the RAIL TRANSIT at 30 - 80 - 120 feet high. It will be very difficult to get this passenger on board so others may board + to be on time.

OVER (2 pages)

to increase passenger - these factors should be addressed.

AR00002614

STAPLE HERE

Department of Transportation Services
Attn: Honolulu High-Capacity Transit Corridor Project
City and County of Honolulu
650 South King Street, 3rd Floor
Honolulu, HI, 96813

Return Address

Patsy Mucahi
3039 Kaumaaa Pl
Honolulu, Hi 96822

Place Postage Here

FOLD

#2 - Population shift. In 2020-2030 many Baby Boomers will have retired from active work ~~days~~ children and grand children would be driving to work & other destinations the question to address is will they use the public RAIL TRANSIT or use their computers from their homes rather than ~~go~~ to work in Town - so they may be less commuters using public mass Transit such as the RAIL - Steel on Steel System proposed for Oahu

AR00002615

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

KENNETH TORU HAMAYASU
DEPUTY DIRECTOR

June 11, 2010

RT10/09-336954

Ms. Daisy Murai
3039 Kaunaoa Street
Honolulu, Hawaii 96815

Dear Ms. Murai:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

As stated in Section 2.5 of the Final EIS (and reproduced below), the transit system will comply with regulations of the Americans with Disabilities Act (ADA). Elevators and escalators will be provided at all stations. In addition, level boarding will be provided to trains; therefore, stairs or lifts, as used on buses, will not be required.

All buildings, facilities, and vehicles will conform to applicable Federal, State, and County accessibility guidelines and standards. HRS Section 103-50 requires that all State or County government buildings, facilities, and sites be designed and constructed to conform to the Architectural Barriers Act/Americans with Disabilities Act Accessibility Guidelines (36 CFR 1190 and 1191), issued by the U.S. Access Board, and other

applicable design standards as adopted and amended by the Disability and Communication Access Board. The law further requires all plans and specifications prepared for construction of State or County government buildings, facilities, and sites be reviewed by the Disability and Communication Access Board for conformance to those guidelines and standards.

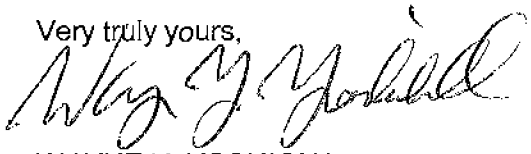
Station platforms will be of similar height to the third or fourth floor of buildings. Individuals who are uncomfortable above ground level may choose to take local bus transit that avoids elevated freeway sections.

Projections of future transit ridership consider projected demographics for Oahu in 2030. Ridership projections are presented in Section 3.4.2 of the Final EIS. As shown in this section, transit ridership will increase 44 percent with the Project as opposed to not building it.

Tele-working is becoming increasingly acceptable as a work-place alternative. Specific decisions about workforce management would be made by individual employers. It is possible that local and state government could create policy incentives to employers to encourage alternative workplace arrangements to better accommodate a tech-savvy generation of workers.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,



WAYNE Y. YOSHIOKA
Director

Enclosure

298709

RECEIVED
09 FEB 6 P12:33
DIRECTOR'S OFFICE
CITY & COUNTY OF HONOLULU
TRANSPORTATION SERVICES

Mr. Wayne Yoshioka, Director
Dept. of Transportation Services
City & County of Honolulu
650 S. King Street, 3rd Floor
Honolulu, HI 96813

RE: Oahu's High Capacity Mass Transit Environmental Impact Statement (EIS)
NOT IN SUPPORT of a STEEL ON STEEL RAIL TRANSIT SYSTEM

Director Yoshioka:

My name is Daisy Murai, a resident of Kapahulu, which is next neighborhood to Waikiki, in the Primary Urban Center (PUC). My main mode of my transportation needs is serviced by the City's Public Bus System on a daily bases, unless I car pool, walk, take a taxi or trolley. I am fortunate that the buses in the Primary Urban Center come quite frequently within minutes of each other and very near to my home or destination(s), unlike other areas of the Island, where the bus stop is about ½ mile or farther away from homes and the service is 30 minutes to once an hour.

I enjoy and have had the experience of riding the Public Mass Transit Systems/Network in other Cities I have traveled, such as buses in New York City, St. John (New Brunswick), Japan and Las Vegas. I have also ridden the Staten Island Ferry in New York City (going to the Statue of Liberty), St. Charles Street Car in New Orleans and the Metro System in Washington D.C. The St. Charles Street Car (rail tracks are at street level) and Metro System of Washington D.C. (rail tracks are mostly underground -except for areas such as Arlington Station which is above ground), both of these systems use a steel on steel technology, which require huge areas of land for the tracks, transit trams and stations. I have found this system of steel wheels running on steel tracks also generates lots of noise, each time the trams starts up and stops on the steel tracks – and even making screeching noises when it stops.

The traffic congestion and gridlock facing Oahu drivers during the morning and afternoon Rush Hours from the West side to Downtown, is the reason for a High Capacity Mass Transportation System or some other Transportation Network System, which should alleviate traffic congestion and keep the traffic flow during these few hours of the day from Monday through Friday. The population base continues to grow on the West side of Oahu, as the City's Department of Planning and Permitting continue to issue Building Permits for future Residential and Commercial Development Projects, without increasing transportation infrastructural projects to meet population density increases.

The City's High Capacity Mass Transit or better known as "RAIL TRANSIT" Project is an elevated fixed guideway with a Steel on Steel Technology Transit System, of which the surface of the tracks will not be able to be utilized by any rubbernized vehicles, even emergency vehicles. The height of the fixed guideway with an elevation between 30 to 120 feet tall and support columns with a diameter of 6 feet wide and wider. It will be built in places with open lands of Kapolei as well as farm lands (Aloun Farms) and continue through the Primary Urban Center of Honolulu (building between existing buildings – including Historical areas), forcing the City to purchase private properties or even obtain the properties via eminent domain condemnation for the project, since Oahu is not as large as other places on the Mainland or the world.

The City's EIS does not address the complete Locally Preferred Alternative (LPA) route selected and approved by the City Councilmembers, which should also address the University of Hawaii at Manoa and Waikiki segments. The current route chosen to end at Ala Moana Center's Nordstrom's Department Store is actually Mayor Hannemann's Minimum Operational Segment (MOS) route, which is only a portion of the entire LPA approved by the City Council. I feel the entire LPA approved by the Councilmembers should be in the EIS. The route has just been changed and approved by the City Councilmembers on January 28, 2009 with a portion going to the Airport rather than through the Residential Community of Salt Lake.

AR00002618

The planning, design, land acquisition and constructing of Oahu's largest public works project will certainly require years to complete and will exhaust the Rail Transit funds collected by the State of Hawaii through a ½% General Excise tax to the year 2022. Even if the Federal Government somehow manages to release $ 1 Billion dollars for this ambitious public works project on such a small land mass area and small population base (with comparable Cities) on the island of Oahu, the amount collected on the ½% general excise tax alone is not enough. In fact, Mayor Hannemann's wish list from the State of Hawaii is the State's 10% administration fee for collecting the ½% G.E. tax for Oahu and money collected for Traffic Violations by the City. (Refer to the articles in our 2 daily Newspapers dated January 14, 2009).

There are portions of the Rail Line (Nimitz Highway) which is several feet away from the ocean. Halekauwila, Queen and Kona Streets are also close to the Ocean. The project developers, when digging the properties for the Rail Transit will at times stumble upon human bones, which is a common occurrence in Hawaii. There were several projects, such as the Super Center Wal-Mart/Sam's Club on Keeaumoku Street, H-3 Tunnel/Freeway and Whole Foods Structure at Ward Centre are just a few examples, where workers have uncovered human bones from old and unmarked burial sites. In the 1800's, the people of Hawaii would bury their loved ones close to the ocean or in the mountains in unmarked gravesites.

This project will require roughly 9 years for the first phrase as mentioned at the City's Dept. of Transportation Services, presentation of October 29, 2009 at the State Capitol. By that time most of the current Baby Boomers will have retired, such as myself. If I were to utilize this Rail Transit System to get to Aloha Tower Station from my home in Kapahulu for example, I would need to catch a circulator bus from my home to Ala Moana Center, get off at Ala Moana Boulevard, walk across the Center to Nordstrom Department Store (10 minute walk), go up 30-80 feet (another 5 minutes) to ride the tram, get off at the Aloha Tower Station Transit Station, go down to street level and walk across to Aloha Tower Marketplace. If I caught the circulator bus, I would get off at the Aloha Tower Stop on Ala Moana Boulevard, (which is 5 - 7 minutes away from Ala Moana Center) and walk 2 – 3 blocks, which is a more direct route and get there much faster than the Rail Transit System.

The Rail Transit trams will be in operation 3-10 minutes apart and from 4 in the early morning to 12 midnight every single day. The 3 – 6 minute intervals between trams will make it extremely difficult for passengers with walking difficulties and wheelchair bound to board the ADA compliant trams during "RUSH HOURS"– even if the platform and boarding passageway are of the same level. The reason is due to the relatively short time of 3 – 6 minutes to board, settle and be secured in their seats. Not all handicapped & wheelchair bound passengers will be able to settle safely into their seats within 3 – 6 minutes. I have observed some of these passengers who use the current buses, require much more than 3 minutes to maneuver their wheelchair and be properly secured, once they have boarded the buses, Some of them require several minutes of back & forth movement of their wheelchair to be in the correct position for the drivers to secure their wheelchair. I also understand that bicyclists will not be able to board the trams with their bicycles during "RUSH HOURS", since they will slow down other passengers from boarding the trams, as mentioned by Outreach Coordinator Pat Lee. I did not witness any wheelchair bounded passengers ride the METRO System in Washington D.C. It could be due to the limited time required to board the trams since the trams run on a tight schedule, even if these passengers were able to get below street level to the platforms.

I have 2 friends who live on the Westside of Oahu and drive to work. They both are deadly afraid of heights to the point where they will, close their eyes, break out in a cold sweat and inch their way slowly while they hug the building walls without looking downward whenever they know they are several feet above the ground. These 2 will continue to drive to work, further adding to the traffic congestion. There are other drivers who are also deadly afraid of heights and probably continue to drive during "RUSH HOUR" than ride the Rail Transit.

The State's Director of Transportation (DOT) nor Governor Lingle at this time, have NOT approved the City using the State's Highways, Freeways and surface streets (H1, H2, Farrington Highway, Kamehameha Highway, Nimitz Highway, parts of Ala Moana Boulevard and other State owned roadways) for the City's Fixed Guideway Rail Transit project. These are crucial Right-of-Way roadways needed for the City's RAIL Project to reach Downtown and beyond. State's DOT Director Brennon Morioka and Governor Lingle announced 2 State High-way projects to

help relieve traffic congestion for motorists traveling to and from West Oahu. The Federal Government and the Governor have both released funds to start these 2 projects. Project No. 1 will replace the current morning zipper lane on the H1 Freeway with 2 contra-flow (East bound in the morning and Westbound in the afternoon between Keehi & Waiawa Interchanges) lanes during Rush Hours. The 2nd project is to widen the Middle Street merge going eastbound to relieve bottlenecking from Ola Lane to Vineyard Boulevard. Please refer to the State of Hawaii's web site (www.hawaii.gov) dated January 23, 2009 under Governor Lingle's press releases.

These are the reasons, why I feel other Transportation Alternatives needs to be re-visited for a better solution, than to totally rely on the "Steel on Steel RAIL TRANSIT" as the only source for traffic congestion relief. I would suggest:

1) Build an elevated EXPRESS Way for High Occupancy Vehicles (3 or more per vehicle) without charge, and charge other motorists with less than 3 in the vehicle. An electronic eye could monitor if payment is due. The payments collected would help pay for the operation and maintenance of this project.

2) The City's Dept. of Transportation Services mentions additional buses on the roadway will further compound traffic, causing gridlock on the roadways. The solution could be, keep the bus fleet at 525 buses, but change some of the routes to go into areas with new Residential Developments (not just keep it on the Main roadways), change 1 bus on the current route to an Express Bus, and change more routes to connect to other communities on Oahu. The Express Buses are well used by bus passengers, once they understand the route it travels. I usually take the Express Buses A, B, C and E unless I need to get off at a bus stop the Express Bus does not stop at. The Express buses on the whole are well utilized by the number of passengers I see riding them daily during Rush Hour. These buses are not as crowded at other times, but very convenient and a fast way to get to your destinations.

3) The power source to fuel the steel tracks & trams for the Rail Transit is electricity, generated by Hawaiian Electric Company (HECO) on the island of Oahu. Recently, HECO's system has been tested with an Island-wide (Island of Oahu) Black-Out situation – the October 6, 2006 earthquake and the December 26, 2008 lightening storm incidents (please refer to our 2 daily newspapers regarding information to the Island-wide black-outs at www.honoluluadvertiser.com or www.honolulustarbulletin.com for articles dated the following day of each instance). In both cases, the generators at the relay stations turned off automatically to prevent major damage to the system. In both instances, it took HECO several hours – even lasting into the following day to be back to full capacity. Even though HECO is looking into alternative energy sources for the future and is to be the sole provider of electricity, based upon it's performance of restoring power to the 2 island-wide power black-out incidents, it will be several hours or days before the Rail Transit will be back in full operation. HECO needs to restore power to it's customers – especially the Health-Care providers, Schools, Safety and other Emergency facilities, before restoring full power to the other customers and the Rail Transit System.

Upon completion of the project, the residents traveling during "RUSH HOUR" to Downtown and back to the West side will be the current younger generation of which many continue to travel via their own private vehicle rather than use the City's Mass Transportation System, further compounding traffic gridlock. I feel it would make more sense to build an elevated roadway for smoother traffic flow, charge for vehicles carrying less than 3 using the Express Roadway, and improve the current Bus routes would be a better system. This would not be as costly as the "Elevated Fixed RAIL TRANSIT". The businesses in the near future may even have their employees work from home to reduce traffic congestion. My cousin & his wife, who live in California, both are salespersons of major Corporations and both work from home, but will commute to their work place only when needed –which means 2 few cars on the roadway.

Thank you for the Opportunity to Speak. **I DO NOT SUPPORT a $ 5 – 6 plus Billion Elevated Fixed Guideway with a RAIL STEEL ON STEEL Transit project for the Island of Oahu. I would appreciate the City and County of Honolulu to revisit other alternatives in the EIS, especially since the State of Hawaii auditor's report clearly shows grave over-sight on problems with of our Superferry,** (a State of Hawaii project) **which is showing up now – several months after the Superferry started operating between the islands of Oahu and Maui. The State did not do an EIS prior to the start of this interisland transportation system, which is clearly showing that impact problems should have been addressed in the EIS.** (Please refer to Honolulu Advertiser and Honolulu Star Bulletin articles dated from December 18, 2008). I was told by a testifier at the Public Meeting, that the City will allow only 1 testimony per person at any public hearing -even if there might be new information presented after the testimony, which I feel that the City is clearly inhibiting the general public's imput – especially when the Impact of this project is so enormous and Most people on Oahu will be affected.

Daisy Murai
3039 Kaunaoa Street
Honolulu, Hi 96815
Dated: February 1, 2009

cc: Mr. Ted Matley
Federal Transit Authority, Region IX
201 Mission Street, Suite 1650
San Francisco, CA 94105

cc: Governor Linda Lingle
Hawaii State Capitol
415 S. Beretania Street, 5th Floor
Honolulu, HI 96813

cc: Councilmember Duke Bainum, District 5
City & County of Honolulu
530 S. King Street, 2nd Floor
Honolulu, HI 96813

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

KENNETH TORU HAMAYASU
DEPUTY DIRECTOR

June 11, 2010

RT10/09-298709R

Ms. Daisy Murai
3039 Kaunaoa Street
Honolulu, Hawaii 96815

Dear Ms. Murai:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

Initial Comments

Concern about land acquisition

Land acquisition requirements for the system will be limited because the elevated system will not be interspersed with traffic. The elevated system takes advantage of vertical space over existing roadways eliminating the need to accommodate transit-dedicated space at-grade alongside mixed traffic.

Section 4.4 of the Final EIS and Appendix C address acquisitions, displacements, and relocations. Table 4-4 indicates that the Project will require 40 full and 159 partial acquisitions. Where acquisition of property will occur, compensation will be provided to affected property owners, businesses, or residents in compliance with all applicable Federal and State laws and will follow the Federal Uniform Relocation Assistance and Real Property Acquisition Policies Act.

The guideway will have a maximum track height of approximately 110 feet and will accommodate only steel-wheeled vehicles.

The discussion of farmland, including that in use by Aloun Farms takes place in the Final EIS Section 4.2.3. The analysis concludes that the Project's effect will not be substantial and no mitigation will be required.

Concern about noise mitigation

Final EIS Section 4.10 addresses strategies to mitigate for noise impacts through materials and design, including the use of wheel skirts. With mitigation, the Project will not have noise impacts per FTA criteria.

The Project will provide transit infrastructure designed to meet the mobility needs of an increasing, and increasingly densely situated population.

Concern about operating in a dense urban environment

Final EIS Section 4.16 addresses impacts and mitigation to Archaeological, Cultural, and Historic Resources. The Project is subject to compliance with the National Historic Preservation Act (NHPA) of 1966, as amended (16 USC 470 et seq.). The Project will have adverse effects to historic properties; those effects and required mitigation to address them is addressed in the Programmatic Agreement in Appendix H.

Concern about alignment

Chapter 1 of the Final EIS describes the entire proposed action of construction and operation of a fixed guideway transit system between logical termini in East Kapolei and Ala Moana Center. Since selection of the First Project by City Council Resolution 07-039, project information has detailed the limits of the Project and illustrated other areas that were included in the Long-Range Plan as future or planned extensions. The Project has logical termini at East Kapolei and Ala Moana Center and independent utility from any extensions that may be constructed in the future.

Concern about future extensions

The proposed future extensions to West Kapolei, Salt Lake Boulevard, Waikiki, and UH Manoa are discussed in the cumulative impacts sections of Chapters 3 and 4 of the Final EIS. Future extensions may have additional stops in Waikiki or the Diamond Head area. The future extensions are not part of this Project; thus, they are not required to be evaluated under Chapter 343 of the Hawaii Revised Statutes and NEPA. Under NEPA, environmental analysis is only required when there is a proposed action by a Federal agency. Because the future extensions are not proposed for implementation at this time, they are not part of the Project studied in this Final EIS. If the future extensions are proposed for implementation in the future, environmental analysis of the extensions and appropriate alternatives will be undertaken at that time.

Concern about financial resources

Section 6.3 of the Final EIS describes the financial resources anticipated to be needed to pay for the capital costs of the Project. Capital costs of the Project, including finance charges, are expected to be fully paid for by a combination of FTA Section 5309 New Starts and

FTA Section 5307 Funds from the Federal government and revenue from the County General Excise and Use (GET) Tax surcharge levied from 2007 through 2022 on Oahu.

Chapter 2 of the Draft EIS, as well as in Chapter 2 of the Alternative Analysis, show the total capital costs for the Managed Lane Alternative would range between $3.6 and $4.7 billion, of which $2.6 to $3.8 billion would be for construction of the managed lanes. The transit operating costs for the managed lane would range between approximately $251 and $261 million as a result of additional buses that would be put in service under that alternative. These costs do not include the cost of maintaining the managed lane facility. In Chapter 6 of the Final EIS, the capital costs of the Fixed Guideway Alternative, including bus system costs, will be $4.6 billion, including finance charges, in 2009 dollars. Total operating costs for the Fixed Guideway Alternative, including bus, TheHandi-Van, and fixed guideway, will be approximately $298 million in 2009 dollars.

The Fixed Guideway will be more cost-effective over the long-term. As stated in Section 6.3 of the Final EIS, funding sources for the capital investments include FTA Section 5309 New Starts and FTA Section 5307 funds from the Federal government and the GET surcharge. Only the Fixed Guideway Alternative could be funded with the GET surcharge. The GET is expected to generate $3.5 billion through 2022 and the FTA's agreement to consider at least $1.55 billion for Federal contribution to the Project the New Starts program for the Fixed Guideway. No funding sources were identified for the Managed Lane Alternative. Toll revenues from the Managed Lane Alternative would pay for ongoing operating and maintenance while remaining revenues would be used to repay debt incurred to construct the system.

The taxes used to fund the Project will provide a system that will serve the vast majority (70 percent) of the population and employment within the corridor. It also furthers the policy guidance of the City Council regarding alternatives modes and support of the development of Kapolei as Oahu's "second city." The capacity of the proposed system is sufficient to accommodate very large increases in demand over time. While the present design identifies approximately 8,000 passengers in the peak hour peak direction and provides the vehicles to handle that demand, the system can handle over 50,000 people an hour by adding cars to each train and reducing the time between trains.

Concern about archaeology and management of unmarked graves

Final EIS chapter 4.16 Archaeological, Cultural, and Historic Resources describes the Programmatic Agreement (PA) developed in consultation with the State Historic Preservation Division (SHPD), the Advisory Council on Historic Preservation, Native Hawaiian organizations, and other stakeholders to address management of inadvertent archaeological, cultural, or historic finds during construction.

The Project may be subject to compliance with the Native American Graves Protection and Repatriation Act (NAGPRA) (25 USC 3001) where it crosses lands controlled or owned by the Federal Government. Any human remains found on lands owned or controlled by the Federal government will be addressed in accordance with NAGPRA and 43 CFR 10—the regulations that define the process and procedures of NAGPRA.

During the archaeological sampling, Native Hawaiian burials will be identified and managed in compliance with applicable laws. This will include consultation with project proponents, the Oahu Island Burial Council, SHPD, and recognized lineal and/or cultural descendants to develop burial treatment plans. Although the goal of the archaeological sampling will be to identify all burials and treat them appropriately prior to the start of construction in a particular area, the possibility exists that additional previously undiscovered burials will be encountered during construction. In addition, protection zones would be created around resources that are identified prior to construction. The PA outlines the treatment of burials discovered during construction.

Concern about travel times

Travel times with the fixed guideway system will be faster than bus travel. The rail station is immediately adjacent to the bus terminal at Ala Moana Center. Trip time via fixed guideway from Ala Moana Center to Downtown would only take four minutes (as shown in Table 3-16 in the Final EIS). There will be a mezzanine level at the Downtown Station, thus allowing an individual to access Aloha Tower without crossing Nimitz Highway at street level. Traffic congestion on roadways is expected to worsen by 2030 and this will cause an increase in bus or car trip times. In addition, all fixed guideway stations will be equipped with escalators and elevators.

The dwell time at each station will be approximately 30 seconds. This is sufficient time for passengers, even those using wheelchairs, or individuals with strollers, carts, or rolling luggage to enter or exit the vehicle. Because of the smooth automated train operation, driver securement will not be required for wheelchairs. Bicycles will be allowed on the system as regulated by a bicycle policy. As stated in Section 2.5.1 of the Final EIS: "Bicycles, luggage, and surfboards will be allowed on trains and regulated by policy to address high demand periods or special conditions."

Concern for those with height phobias

The station platforms will be of similar height to the third or fourth floor of buildings. Individuals who are uncomfortable above ground level may choose to take local bus transit that avoids elevated freeway sections. Projections of future transit users consider projected demographics for Oahu in 2030.

Concern about right of way acquisition

The Hawaii Department of Transportation (HDOT) is a cooperating agency on the Project. There is continuous coordination between DTS and HDOT. Easement agreements and permits to use State right-of-way can only be finalized after acceptance of the Final EIS.

Under the No Build and Airport Alternative, the travel forecasting model has assumed that several transportation projects, including congestion-relief items for Oahu streets and highways, would be in place in 2030. These projects are detailed in Table 2-4 of the Final EIS and include the p.m. zipper lane and widening of the H-1 Freeway. As identified in Table 3-14 of the Final EIS, the Project will reduce vehicle delay by 18 percent compared to the No Build Alternative. This reduction in delay is attributable to shifts in travel demand from the automobile to transit.

In Chapter 2 of the Alternatives Analysis Report (DTS 2006b), which is available on the project website (www.honolulutransit.org), and Chapter 2 of the Final EIS, two options were considered for the Managed Lane Alternative (Two-direction Option and Reversible Option). This alternative would have provided a two-lane elevated toll facility between Waipahu and Downtown Honolulu, with variable pricing strategies to maintain free-flow speeds for transit and high-occupancy vehicles (HOVs). The Two-direction Option would have served express buses operating in both directions during the entire day. To maintain free-flow speeds in the Two-direction Option, it may be necessary to charge tolls to manage the number of HOVs using the facility. For the Reversible Option, three-person HOVs would be allowed to use the facility for free, while single-occupant and two-person HOVs would have to pay a toll. The Reversible Option was found to be optimal.

Proposal of an Express Way

The proposal for an elevated "EXPRESS Way" has been evaluated previously as the Managed Lane Alternative in the Alternatives Analysis Report. The findings are summarized in Chapter 2 of the Final EIS as follows: "The Managed Lane Alternative was evaluated for its ability to meet project goals and objectives related to mobility and accessibility, supporting planned growth and economic development, constructability and cost, community and environmental quality, and planning consistency. Transit reliability would not have been improved except for express bus service operation in the managed lanes. While this alternative would have reduced congestion on parallel highways, system-wide traffic congestion would have been similar to the No Build Alternative as a result of increased traffic on arterials trying to access the facility. Total islandwide vehicle hours of delay would have increased with the Managed Lane Alternative compared to the No Build Alternative, indicating an increase in system-wide congestion (Table 2-2, Final EIS)."

The Managed Lane Alternative would not have supported planned concentrated future population and employment growth because it would not provide concentrations of transit service that would serve as a nucleus for transit-oriented development. The Managed Lane Alternative would have provided little transit benefit at a high cost. The cost-per-hour of transit-user benefits for the Managed Lane Alternative would have been two to three times higher than that for the Fixed Guideway Alternative. Similar to the TSM Alternative, the Managed Lane Alternative would not have substantially improved service or access to transit for transit-dependent communities. No funding sources were identified for the Managed Lane Alternative. Toll revenues from the Managed Lane Alternative would pay for ongoing operating and maintenance while remaining revenues would be used to repay debt incurred to construct the system.

The Managed Lane Alternative would have generated the greatest amount of air pollution, required the greatest amount of energy for transportation use, and would have resulted in the largest number of transportation noise impacts of all the alternatives evaluated. Because the Managed Lane Alternative would have served a shorter portion of the study corridor (approximately 16 miles compared to the 20 miles served by the fixed guideway), it would have resulted in fewer displacements and would have impacted fewer archaeological, cultural, and historic resources than the Fixed Guideway Alternative. The Managed Lane Alternative would not have affected any farmlands. Visually, the elevated structure would have extended a shorter distance, but it would have been more visually intrusive because its elevated

structure, with a typical width of between 36 and 46 feet, would have been much wider than the Fixed Guideway Alternative.

After the Alternatives Analysis was completed, several scoping comments were received requesting reconsideration of the Managed Lane Alternative that was considered and rejected during the Alternatives Analysis. Because no new information was provided that would have changed the findings of the Alternatives Analysis regarding the Managed Lane Alternative, it was not included in the Draft EIS for further consideration.

Proposal to limit future bus fleet size

The proposal to limit the future bus fleet to the size of the existing fleet of 525 buses would result in a fleet that is insufficient to handle ridership demand in 2030 without the Project. As stated in Section 3.4.2 of the Final EIS, "Although some increases in bus services would occur under the No Build Alternative, a review of route-specific demand and service levels for 2030 indicates that bus capacity would be exceeded for several routes. In some cases the demand per bus trip would be more than twice the seating capacity. In these instances, passengers would be unable to board the bus."

Figure 3-1 of the Final EIS offers the primary explanation why the transit ridership achieved in 1984 has not been surpassed even though the bus fleet has increased. Due to increasing traffic congestion, bus operating speeds deteriorated between 1984 and 1992. During this period, no other comparably sized bus system in the United States moved more riders per bus hour than the Honolulu service. This is according to annual reports filed by the transit operators with the Federal government.

Buses were added in Honolulu to maintain service levels. In 1989, there were 475 buses available for service as reported in The State of Hawaii Data Book 2000. The number of available buses increased to 495 in 1993 and 525 in 1995. In 2007, the total number of available buses was 531. However, increasing congestion required more buses to provide the same level of service along the same route because the total trip time for one bus to serve the entire route was increasing. For example, Figure 1-11 of the Final EIS shows how afternoon scheduled trip times for selected routes have increased from 1992 to 2008 (Source: TheBus public timetables). The time for Route 52 (Circle Isle) to complete a trip has increased over 30 minutes, and the trip time for Ewa Beach has increased almost 60 minutes. The result has been that a bus can no longer make as many trips as it did in the past. This has required the need to add buses to routes to maintain the same interval between buses.

Over the past 10 years, the system operating speed has continued to decline. Even though the annual number of miles operated in revenue service has increased 11 percent from 1997 to 2007 per the National Transit Database, it took a 16 percent increase in the annual number of hours to operate those additional miles. This has contributed to higher operating costs.

Careful examination of Figure 3-1 of the Final EIS depicts two times when bus operating speeds slightly and temporarily increased. Both of these occasions were the result of concerted efforts to enact systematic and comprehensive improvements to TheBus system. The most recent of these was from 1999 to 2001. New service design substantially improved bus services in the Ewa and Waianae areas with the introduction of a wide array of new community circulators, local, and CountryExpress! bus routes.

The benefits of these improvements have been temporary. Increasing system usage and traffic congestion have combined to negatively impact the overall system operating speed as shown in Figure 3-1 of the Final EIS.

Since the early 1990s, the number of TheBus trips to and from Waikiki has decreased from over 1,050 trips to 994 trips today. For example, Route 8 had 189 trips to and from Waikiki in 1992; today the route has 143 trips. Similarly, Route 19 has experienced a decrease in trips to and from Waikiki from 125 to 71 trips today. The number of trips on Route 20 has decreased from 78 to 39 trips.

Figure 1-2 of the Final EIS presents population, vehicle ownership, and vehicle miles trends for Oahu. The significant relationship in this graphic is the disproportionate increase in vehicle miles traveled compared to population and vehicle registrations. The consequence of the increase in vehicle miles traveled is congestion, causing slower operating speeds for all vehicles, including transit. This impact is depicted in Figure 3-1 of the Final EIS.

The fleet size has not stagnated. However, to operate the same number of miles of service in 2007 at 13.2 miles per hour requires about 50 more buses than in 1984 when the operating speed was 14.7 miles per hour.

The purpose of Figures 1-5 and 1-6 of the Final EIS is to show population and employment distribution and growth for Oahu. Appendix D of the Final EIS includes existing and future bus routes, including route numbers and frequencies.

The Project is designed with 240-foot station platforms that can accommodate trains with up to four 60-foot cars. Each car can hold over 160 passengers, so a four-car train can carry more than 600 passengers. The train control system is being designed to accommodate 90-second headway service, or 40 trains per hour. Forty 4-car trains in an hour could accommodate at least 24,000 passengers per hour per direction. This demand is larger than is forecast to occur in 2030. 2030 peak hour demand for the Project is expected to be about 8,100 passengers per hour in the peak direction. This demand can be accommodated by operating 3-minute headway service with a mixture of two-car and three-car trains. A fleet of approximately 150 vehicles to accommodate this demand is budgeted for purchase as part of the Project. However, as noted above, more than three times as many passengers per hour can be accommodated at some future date merely by expanding the fleet size.

Concern related to electrical generation and delivery

Since trains and rail stations will be electrically powered, the system's infrastructure is being designed to handle service disruptions. For example, trains will draw power from many points along the route, so an outage in a few areas should not disrupt service. If electrical power is lost system-wide, then train brakes are designed to stop the rail cars even without power. Lights will stay on in trains and stations; backup batteries will provide lighting for several hours. The train operations center will communicate with passengers via the public address system and intercom to provide guidance.

If power is restored within a short time, service will resume. With a prolonged outage, the operations center will direct passengers to exit the trains and walk along a lighted emergency walkway on the guideway to the nearest station. For those unable to exit rail cars,

help will be provided by emergency responders and transit staff. Passengers will be met at the train station by a coordinated response from emergency responders and city transportation workers.

As stated previously, the Managed Lane Alternative was examined during the Alternatives Analysis and was found to provide little community benefit, as it would not have resulted in substantially improved transit access in the corridor.

Final Comments

Tele-working is becoming increasingly acceptable as a work-place alternative. Specific decisions about workforce management would be made by individual employers. It is possible that local and state government could create policy incentives to employers to encourage alternative workplace arrangements to better accommodate a tech-savvy generation of workers.

Comparison with the super ferry project

The NEPA process is a federal requirement only for federally funded projects. If the Super ferry project did not involve a federal agency, then the level of environmental review would have been determined by State and local jurisdictions only.

Testimony at local hearings

In response to your concern that "the City will allow only one testimony per person at any public hearing – even if there might be new information presented after the testimony." Under NEPA, FTA encourages ongoing dialogue with members of the public about its federally funded transit projects. It is possible that in order to provide all participants with an opportunity to speak, the City may suggest time limits for verbal comments. This is not intended to stifle public response; rather it is intended to provide an opportunity for everyone who would like to speak.

Multiple forms of testimony were supported at each hearing, including a hearing examiner, provision of a separate court reporter to record testimony, and comment forms to provide written testimony. Individuals could come to as many or few hearings as desired and testify at each hearing. The public was also able to provide comment via the project website (www.honolulutransit.org), or could provide written comment directly to DTS.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
Creation Date :	12/9/2008
Creator Affiliation :	
First Name :	Byron
Last Name :	Muramatsu
Business/Organization :	
Address :	
Alternative Preference :	
Apt./Suite No. :	
City :	
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Email :	bmuramatsu@hotmail.com
Telephone :	
Telephone Extension :	
Add to Mailing List :	Email
Submission Method :	Website
Other Submission Method :	
Submission Date :	12/09/2008
Submission Content/Notes :	I agree with Charles Djou that the rail system should start in town and build out to Kapolei. The reason being income generating and ridership. There would be more people using the rail system starting from town because of the population base. Secondly with more people riding the rail there will be more revenues generated to off set the cost of building the rail. Another point I would like to make is the Airport route is more favorable vice the Salt Lake route. Every major city has a rail system that incorporates the airport as a significant stop because of the people traffic. No one other than the Salt Lake residence would want to drop off or get on at a Salt Lake rail stop. On the other hand all of the people of Hawaii from the neighboring islands as well as the windward side of Oahu would consider using an airport rail stop sometime in their life. The airport rail stop could be a means of transportation to get to an overnight stay at any hotel. The rail stop could be a means of avoiding the Middle street and Punahou Street road traffic bottleneck. The Rail System has been approved by the State of Hawaii now lets build it in the most practical way possible where all the people of Hawaii can get to see and use the system as soon as possible. No more studies, no more discussions, let's start breaking ground and get to work.

DEPARTMENT OF TRANSPORTATION SERVICES

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-331589

Mr. Byron Muramatsu
bmuramatsu@hotmail.com

Dear Mr. Muramatsu:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall indentify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

As described in Section 2.5.10, Project Phasing, and further in Section 8.6.9, Construction Phasing, in the Final EIS, to support phased opening, the first construction phase must be connected to a maintenance and storage facility, which requires considerable space. No location has been identified closer to Downtown with sufficient available space to construct a maintenance and storage facility. Therefore, construction will begin between East Kapolei and Leeward Community College. The Project will be constructed in phases to accomplish the following:

- *Match the anticipated schedule for right-of-way acquisition and utility relocations.*
- *Reduce the time that each area will experience traffic and community disturbances.*
- *Allow for multiple construction contracts with smaller contract size to promote more competitive bidding.*

- *Match the rate of construction to what can be maintained with local workforce and available financial resources.*

- *Balance expenditure of funds to minimize borrowing.*

The portion of the corridor in the Ewa direction of Pearl Highlands is less developed than the areas in the Koko Head direction. Right-of-way can be obtained more quickly at the west end of the Project; therefore, overall project construction can begin earlier, resulting in lower total construction costs. Construction is planned to continue uninterrupted in the Koko Head direction from Pearl Highlands to Aloha Stadium, Kalihi, and finally to Ala Moana Center.

As portions of the Project are completed, each will be opened incrementally so that system benefits, even if limited during the initial phases, will be realized prior to completion of construction of the entire Project.

Your preference for the Airport Alternative has been noted. While each of the alternatives discussed in the Draft EIS includes trade-offs between benefits and impacts, the Airport Alternative from East Kapolei to Ala Moana has been identified as the Preferred Alternative as described above. As compared to the other alternatives discussed in the Draft EIS, the Airport Alternative will carry the most passengers, provide the greatest transit-user benefits, and result in the fewest vehicle hours of delay. It will provide access to employment centers at Pearl Harbor Naval Base and Honolulu International Airport and will serve the Salt Lake neighborhood with connecting bus service. Of the three Build Alternatives addressed in the Draft EIS, the Airport Alternative will have slightly lower impacts to the natural and built environment. During the public comment period on the Draft EIS, the public overwhelmingly supported the Airport Alternative. Of the comments that specifically supported one of the alternatives, more than 75 percent were in support of the Airport Alternative.

The Alternatives Analysis phase, which preceded the EIS process, is documented in Chapter 2 of the Final EIS. It evaluated a range of modal and general alignment alternatives, in terms of their costs, benefits, and impacts. The scoping process for the Alternatives Analysis involved a presentation of the viable alternatives to the public and interested public agencies and officials to receive comments on the Purpose and Need, alternatives, and scope of the analysis. Scoping for the EIS followed the FTA process that provides for a culling of alternatives studied in the EIS through an Alternatives Analysis. The scoping process initiated for the Alternatives Analysis included a variety of highway, bus and fixed guideway options for consideration. During the later scoping effort for the EIS, the public was requested to propose alternatives that would satisfy the purpose and need at less cost or with greater effectiveness, less environmental or community impact and to propose alternatives that were not previously studied and eliminated for good cause. The only alternative that emerged that met these criteria was a fixed-guideway alternative following several alternative alignments. All reasonable alternatives that emerged from these processes were ultimately evaluated in the Draft and Final EISs.

Since publication of the Draft EIS, design has been advanced, further analysis has been completed, and information has been added in response to comments on the Draft EIS and agency coordination. The Final EIS discusses the process that was used to select the Preferred Alternative, how comments were considered in the decision-making process, impacts, and mitigation commitments.

Lastly, it should be noted that Project construction will be paid for with the local General Excise and Use Tax (GET) surcharge and Federal funding as stated in Chapter 6, Section 6.4.2 of the Final EIS. Revenue generated from ridership will be used to fund operating and maintenance costs.

The FTA and DTS appreciate your interest in the Project. The Final EIS has been issued in conjunction with the distribution of this letter. You may view the Final EIS on the Project website at www.honolulutransit.org. You may request a DVD of the Final EIS and additional content through the "Contact Us" tab on the website or by calling the Project hotline at 566-2299. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

February 3, 2009

Mr. Ted Matley
FTA Region IX
201 Mission St., Ste. 1650
San Francisco, CA 94105

Mr. Wayne Yoshioka
Department of Transportation Services
City and County of Honolulu
650 So. King St., 3rd Floor
Honolulu, HI 96813

Subject: Honolulu High Capacity Transit Corridor Project
City and County of Honolulu
Draft Environmental Impact Statement/4(f) Evaluation
November 2008

Dear Messrs. Matley and Yoshioka:

As long time residents of the Ala Moana-Sheridan neighborhood, we read with interest the Draft EIS for Honolulu's High Capacity Transit project dated November 2008.

We participated in the City and County of Honolulu's preparation of the draft Sheridan community plan in 2006, and appreciated how the vision is consistent with the City and County of Honolulu's Primary Urban Center Development Plan's designation of the Sheridan and Kaheka neighborhoods as In-Town Residential Neighborhoods. In Ala Moana-Sheridan, over 20% of the population is over 65 years old, and the proportion of elderly is steadily increasing (Draft Ala Moana-Sheridan Community Plan, 2006)." In light of this fact, the 2006 draft Plan discusses how public roads and facilities in and around our neighborhood need to be more pedestrian friendly to the elderly, general pedestrians and bicyclists. Therefore, we reviewed the Transit DEIS for a description and analysis of how access to the Transit Corridor Project would be pedestrian friendly for the Ala-Moana-Sheridan neighborhoods.

Instead, we found the Transit Corridor Project DEIS to be heading in the opposite direction making the area more congested with traffic and in turn creating a more rushed environment. The DEIS directly comments that the proposed TOD in the area will change the feel of the area, presumably making it more urban, "Because Kaka`ako has been designated a redevelopment area, changes in land uses to TOD is likely, which may result in a change in character along the alignment, especially near stations...(DEIS, p. 4-45). While we understand change is inevitable, the Transit DEIS does not even discuss basic project features such as access to the Ala Moana transit station for the affected neighborhood. Since safe and secure pedestrian access to and from the Ala Moana transit station is not discussed or analyzed in the Transit DEIS, we assume no design studies or even serious consideration has been devoted to this, the City and County of Honolulu's major public infrastructure project.

Please revise and expand the Transit DEIS to include detailed descriptions and analyses of the range of pedestrian and bicycle access ways to and from the Ala Moana station. If no consideration has yet been devoted to this project element for the Ala Moana-Sheridan community, we submit the DEIS is deficient and is not yet a complete Draft EIS.

AR00002634

Sincerely, Doris Nakamura

Doris Nakamura, 650 Sheridan Street PH, Honolulu, HI 96814

Y. Murata, 1224 (address) KAMAI LP ST. 96814

_____, _____(address) 705 Pikoi St 96814

_____, _____(address) 740 Sheridan St 96814

_____, _____(address) 650 Sheridan #107 96814

cc: Councilmember Duke Bainum, District 5
Senator Carol Fukunaga, District 11
Representative Tom Brower, District 23
Congressmember Neil Abercrombie
Rep. Karl Rhoads, District 28

AR00002635

DEPARTMENT OF TRANSPORTATION SERVICES

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MUFI HANNEMANN
MAYOR

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DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT2/09-299053R

Y. Murata
1224 Kamaile Street
Honolulu, Hawaii 96814

Dear Y. Murata:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

Many pedestrians currently use the network of sidewalks in the Ala Moana-Sheridan neighborhood. The pedestrian volume in the neighborhood will continue to grow with or without the Project. Those walking to the station from surrounding areas will use the existing network of sidewalks. As stated in Section 2.5.5 of the Final EIS, design criteria developed for stations place highest emphasis on walk and bicycle access. Pedestrian access to stations, including accessible routes, shall be given first priority for reasons of safety.

It is estimated that most passengers using this station will transfer to or from buses directly on Kona Street. Those walking to the station from surrounding areas will use the existing network of sidewalks. Bicyclists will access the station via existing streets and/or

sidewalks in the area. The station will be designed to accommodate the expected volume of pedestrians and will provide parking for bicycles.

As indicated in Section 4.6.3 of the Final EIS, ongoing coordination efforts with the public will help develop design measures to enhance the interface between the transit system and the surrounding community. The extent, nature, and location of these design measures will be determined in Final Design through these coordination efforts.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
Creation Date :	1/7/2009
Creator Affiliation :	
First Name :	Samoa
Last Name :	Naea
Business/Organization :	Good Samaritan Church
Address :	P.O Box 31029
Alternative Preference :	
Apt./Suite No. :	
City :	Honolulu
State :	HI
Zip Code :	96820
Email :	
Telephone :	
Telephone Extension :	
Add to Mailing List :	Standard
Submission Method :	Website
Other Submission Method :	
Submission Date :	01/07/2009
Submission Content/Notes :	I want the rail transit to start rolling

DEPARTMENT OF TRANSPORTATION SERVICES

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

May 21, 2010

RT9/09-333535

Samoa Naea
P.O. Box 31029
Honolulu, Hawaii 96820

Dear Samoa Naea:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraph addresses comments regarding the above-referenced submittal:

While each of the alternatives includes trade-offs between benefits and impacts, the Airport Alternative from East Kapolei to Ala Moana Center has been selected as the Preferred Alternative. The identification of the Airport Alternative as the Preferred Alternative was made by the City to comply with FTA's NEPA regulations that state that the Final EIS should focus on the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative, public input on the Draft EIS, and City Council Resolution 08-261 identifying the Airport Alternative as the Project. The selection of the Airport Alternative is described in Chapter 2 of this Final EIS. The discussion of the alternatives considered is included in Chapter 2 of this Final EIS and the Alternatives Analysis. As discussed in Section 3.4.2 of this Final EIS, the Airport Alternative will carry the most passengers with 116,000 daily passengers and 282,500 daily trips in 2030, thereby resulting in the greatest transit-user

benefits. The Airport Alternative will also result in the fewest vehicle miles traveled and vehicle hours of delay, as well as provide access to major employment areas, including Honolulu International Airport, that will have substantially greater ridership than the other alternatives considered. The Project is proceeding as quickly as practical, as illustrated in the schedule presented in Chapter 2 of the Final EIS.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Issuance of the Record of Decision under NEPA and acceptance of the Final EIS by the Governor of the State of Hawaii are the next anticipated actions and will conclude the environmental review process for this Project.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
Creation Date :	1/7/2009
Creator Affiliation :	
First Name :	Tulima
Last Name :	Naea
Business/Organization :	Good Samaritan Church
Address :	P.O Box 31029
Alternative Preference :	
Apt./Suite No. :	
City :	Honolulu
State :	HI
Zip Code :	96820
Email :	gsc_hawaii@yahoo.com
Telephone :	
Telephone Extension :	
Add to Mailing List :	Standard
Submission Method :	Website
Other Submission Method :	
Submission Date :	01/07/2009
Submission Content/Notes :	I support the Rail Transit

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
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WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-333472

Tulima Naea
P.O. Box 31029
Honolulu, Hawaii 96820

Dear Tulima Naea:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraph addresses your comments regarding the above-referenced submittal:

Your preference for a Fixed Guideway Transit Alternative has been noted. While each of the alternatives discussed in the Draft EIS includes trade-offs between benefits and impacts, the Airport Alternative from East Kapolei to Ala Moana has been selected as the Preferred Alternative as described above. As compared to the alternatives discussed in the Draft EIS, the Airport Alternative will carry the most passengers, provide the greatest transit-user benefits, and result in the fewest vehicle hours of delay. It will provide access to employment centers at Pearl Harbor Naval Base and Honolulu International Airport and will serve the Salt Lake neighborhood with connecting bus service. Of the three Build Alternatives addressed in the Draft EIS, the Airport Alternative will have slightly less impacts to the natural and built environment analyzed in the Draft EIS. During the public comment period on the Draft EIS, the public overwhelmingly supported the Airport Alternative. Of the comments that specifically supported one of the

alternatives, more than 75 percent were in support of the Airport Alternative. For more information this selection is discussed in Section 2.4 of the Final EIS. Since publication of the Draft EIS, design has been advanced, further analysis has been completed, and information has been added in response to comments on the Draft EIS and agency coordination. The Final EIS discusses the process that was used to select the Preferred Alternative, how comments were considered in the decision-making process, impacts and mitigation commitments.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

From: Nancy Nagamine [mailto:alohanan@hawaii.rr.com]
Sent: Tuesday, February 03, 2009 10:22 PM
To: Yoshioka, Wayne
Subject: Honolulu Transit Project DEIS comments

Feb. 1, 2009

Mr. Wayne Yoshioka

Department of Transportation Services

2/4/2009

City and County of Honolulu

650 S. King St. 3rd Floor

Honolulu, HI 96813

Dear Sir,

Regarding the Honolulu High Capacity Transit Project, I have concerns that are not adequately addressed in the DEIS. I will refer to this project in this correspondence as "the train". I am requesting a response as I feel these issues need further clarification. My concerns specifically relate to power outages that occur regularly in Hawaii, caused by storms as well as for unexplained reasons. Our power grid is not tied in to a neighboring state and we have little alternate power available. Our electricity system is not as modern as most other states in the US as this island chain is almost 2500 miles away from the nearest land mass. We experience unique tropical weather patterns causing regular major power outages that we are used to just dealing with.

During the recent power outage on December 26, 2008 on Oahu a representative from the City and County of Honolulu was on the radio and several people called in expressing concern about what would happen to the train during a massive power outage such as the one we were experiencing at that time. That official assured listeners there would be backup power for the train, however I feel this issue has not been adequately addressed in the DEIS.

In reviewing the table of contents I cannot locate anything about alternate generators that will take over in the event of a power outage. Could you please provide me with the location in the DEIS of the specific electricity plan for the train should a power outage such as the one that occurred on December 26, 2008 occur once the train is up and running?

I would like information on the cost of such a system, the planned operating expenses, the planned maintenance of this system, the manpower needed to operate such a system, the location of these alternate generators, and how exactly this backup plan would be implemented. I would like to see the entire backup power system described in full detail along with supporting financial estimates.

Could you please address how it would be justified as well to use the generator for the purpose of the train when hospitals, schools, and homes would need this alternate power source during this time? Please also address the affect of the loss of power on emergency vehicles who may need to get to point a to point b with no alternate route as they would not be able to use the train tracks.

2/4/2009

Another issue that has not been adequately addressed in the DEIS is the affect of a hurricane or earthquake on the train. I understand that during the recent hurricane in Houston Texas (Ike) their train was shut down for several days and I would anticipate the same here. I would like to know how loss of power for this system would be mitigated, and how the effects of tropical weather would be mitigated.

It is hard to imagine that if in Houston Texas it took several days to get their train up and running it would take any less time here. Everything takes longer in Hawaii. Please provide the comparison of our system vs. Houston's system as it relates to a hurricane or earthquake.

Thank you in advance for your detailed response.

Nancy Nagamine

42 Namala Place

Kailua, HI 96734

cc. Mr. Ted Matley, FTA

Governor Linda Lingle

2/4/2009

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DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-334436

Ms. Nancy Nagamine
42 Namala Place
Kailua, Hawaii 96734

Dear Ms. Nagamine:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

Since trains and rail stations will be electrically powered, the system's infrastructure is being designed to handle service disruptions. For example, trains will draw power from many points along the route, so an outage in a few areas should not disrupt service. The location of traction power substations are shown in Appendix B of the Final EIS.

If electrical power is lost system-wide, then train brakes are designed to stop the rail cars even without power. Lights will stay on in trains and stations; backup batteries will provide lighting for several hours. The train operations center will communicate with passengers via the public address system and intercom to provide guidance.

If power is restored within a short time, service will resume. With a prolonged outage, the operations center will direct passengers to exit the trains and walk along a lighted emergency walkway on the guideway to the nearest station. For those unable to exit rail cars, help will be provided by emergency responders and transit staff. Passengers will be met at the train station by a coordinated response from emergency responders and city transportation workers. In

response to your comment, we have added text about train operation during power outages to Section 2.5.2 of the Final EIS.

Section 6.3 of the Final EIS describes the financial resources anticipated to be needed to pay for the capital cost of the Project and the City's overall public transportation system. Capital costs of the Project, including finance charges, are expected to be fully paid for by a combination of FTA Section 5307 and FTA Section 5309 New Starts Funds from the Federal government and revenues from the County General Excise and Use Tax Surcharge levied from 2007 through 2022 on Oahu. The analysis takes the current economic downturn into account. Section 6.4 of the Final EIS describes the funding sources to pay for ongoing operating and maintenance costs associated with maintaining the transit system in a state of good repair. Operating and maintenance costs will be paid for from the same sources currently used for TheBus: Federal funding, fare revenues, and subsidies from the City's General and Highway Funds. Costs include construction and maintenance of elements of the power system. The manpower needed to operate the system cannot be determined until the final operating plan is completed. This plan will be completed prior to service.

There will be an uninterruptible power supply at each station, with capability to energize critical systems, such as lighting and communications, for a few hours in the case of a temporary power outage. There will also be a UPS backup for the Operations Control Center (OCC) and a backup diesel generator for long-term backup of the OCC. There will also be a special connection at each station to allow for a portable generator to be used in case of a longer-term outage affecting a single station.

As stated in Section 4.5.3 of the Final EIS, the Project will improve the operation of the roadway network compared to the No Build Alternative by reducing congestion and will improve emergency response times. The Project will not affect police, fire, or emergency medical facilities adjacent to the alignment.

As discussed in the Honolulu High-Capacity Transit Corridor Project Geology, Soils, Farmlands, and Natural Hazards Technical Report, the guideway and other structures will be designed and constructed to withstand earthquakes and wind forces from tropical storms. Some piers and stations will be located on floodplains, but no increased hazards are anticipated because the guideway and stations will be elevated. This technical report is available at libraries, from the DTS, and on the Project website at www.honolulutransit.org.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

-----Original Message-----
From: Ted.Matley@dot.gov [mailto:Ted.Matley@dot.gov]
Sent: Wednesday, February 04, 2009 4:56 AM
To: Miyamoto, Faith
Subject: FW: Honolulu Rail Project DEIS

and another

From: Nancy Nagamine [mailto:alohanan@hawaii.rr.com]
Sent: Wed 2/4/2009 12:31 AM
To: Matley, Ted <FTA>
Cc: wyoshioka@honolulu.gov
Subject: Honolulu Rail Project DEIS

Mr. Ted Matley
FTA Region IX
201 Mission St. Suite 1650
San Francisco, CA 94105

Dear Sir,

Regarding the proposed rail transit system in Honolulu, and the DEIS that is currently being reviewed, I would like to point out some flaws in the process of determining the locally preferred alternative, thus flaws in the DEIS, and the outcome of the recent election.

I do not feel there was fair public input in determining the locally

preferred alternative. Thus, alternatives were not evaluated in the DEIS, rather 3 different rail routes or a no build alternative.

I also feel the public was swayed using tax money to influence the vote in favor of rail.

I also feel the city council of Honolulu ignored public input on the issue and did not answer questions raised by voters.

Review the following personal experiences with this process:

Sometime during 2006: I attended a city council meeting on the issue. Hundreds of people testified, I waited for several hours and had to leave to go back to work. It was difficult to even get in the room because of all the union members who were there.

Sometime during 2006: The city asked for input as they were determining the "locally preferred alternative". I provided my input, which was against rail and in favor of improving the bus system. I got no response other than an acknowledgment and I was put on the city mailing list so I would get their slick shiny brochures promoting their rail project every month.

November 2006: I attended a meeting at Windward Community College and testified against rail. My estimate is there were 40 people who testified, 5 in favor of rail and 35 against rail. Several city council members were there, and there was little dialog. There was no further response to any testimony.

August 28, 2007 I sent a letter to the City Council asking questions regarding what was going on (letter below) and I DID NOT EVER GET A RESPONSE.

From 2007 through June 2008 2.6 million dollars of tax money was spent on advertising and "public outreach" to promote the rail project.

July 2008 through mid October 2008 unknown amounts of additional taxpayer money was spent on massive advertising blitz including print media and radio and public outreach meetings, which promoted this project and influenced the vote. These meetings were all held during October, and an 8 page, full color glossy brochure was inserted in the 3 major newspapers two weeks before the election, all paid for with tax dollars.

November 2008 outcome of the vote:
The vote was clearly influenced. 50.6% of the voters voted n favor or rail, the balance voted against or didn't vote on the issue. Had both sides had equal access to resources, then the vote would have been fair, however the City had TAXPAYER money to spend, thus the election was unfairly influenced.

Although the mayor and city powers claimed they listened to public input, from personal experience that was not at all the case. Rather, people attended meetings and provided feedback to city council members and heard nothing back. The city had no interest in listening to what

people had to say.

Where is the public testimony, and where is the city's response to that testimony? What happened to everything people said? Was it totally dismissed? Where are the spending records, how much money was really spent influencing the vote?

Why did I not get my questions of city council members from August 28, 2007 answered?

This project has been handled in an underhanded fashion from day one and I feel it is my civic duty that you should be aware of the kind of manipulation that went on during the entire process. I urge you to dismiss this DEIS, it is seriously flawed.

Yours very truly,

Nancy Nagamine
42 Namala Place
Kailua, HI 96734

CC Wane Yoshioka, City and County of Honolulu
Governor Linda Lingle, Governor of the State of Hawaii

LETTER REFERENCED ABOVE SENT TO CITY COUNCIL:
August 28, 2007
What is going on at Honolulu Hale?
Since August 7 I have read every editorial regarding the 5 billion dollar fixed rail project that has been printed in the Honolulu Advertiser. Results as follows:
In favor of the project: 4
Against the project/ see better alternatives: 12

Pro arguments are quite weak with the predominant ones being that we need rail because people are tired of sitting in traffic and that we have talked about it long enough, let's just go ahead with it. (It has been proven that the rail project will not help with traffic congestion.)
Opposing arguments:

The cost/ value relationship is not justifiable.
The bus is flexible, it is easy to add buses and subsidize them, costing far less than rail.
Busses go to where the people are, throughout the island. (Flexible, not fixed. And serve more people.)
Many busses can be running during crunch time before 8 AM which will help people more.
Toll roads will cost far less, be self-supporting, AND relieve traffic as proven in Tampa.
The rail system will not help traffic congestion.
Hanneman is leading the city in to fiscal abyss. Homeowners BEWARE.
The federal money we hope to get will be nothing relative to the overall cost.
Fixed rail goes from point A to B and back, what about C, D, and E and so on?

There will be low rider ship on rail as in other cities.
It is inconvenient, need too many transfers, total travel time far too long.
Honolulu is too small to afford this system.
The system will be outdated by the time it is completed.
15 years is too long to wait, other solutions would offer more immediate relief.
Any government run project is plagued with maintenance problems and the system will likely fall in to disrepair.
Dismal record of similar public works projects including calamitous cost over runs, misleading cost-benefit calculations, exaggerated development effects, overlooked and ignored environmental problems, and violation of established practices of good governance, transparency, and public participation in decision making.

City council members, are you paying attention to what your constituents want?
Everyone agrees traffic is a problem, but we want solutions, not government works projects that will not help the problem.
Why will you not at least do what Ann Kobayashi suggests and look at what appears to be a better system? This is starting to smell like a skunk, and you know what they say "if it smells like a skunk there probably is one". We need to find the skunk! (Follow the money.)
Speaking of smells, why did the city run an ad in the Advertiser on 8/22 asking people to protest the possible EPA requirement to add secondary treatment facilities at Sand Island for 1.2 billion dollars? It is OK for you to spend 5 billion of TAXPAYERS money on something that will not fix the traffic problem, yet ask people to protest spending 1.2 billion to fix the treatment facilities? I don't like you spending my money to run this ad!
You have now agreed to pay 86 million to PB Americas (formerly Parsons Brinckerhoff) for an environmental impact study for the train? I don't like you spending my money for this either.
Please, can someone explain to me what is going on at Honolulu Hale?

Nancy Nagamine
42 Namala Place
Kailua, HI 96734
808-263-7853

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-334438

Ms. Nancy Nagamine
42 Namala Place
Kailua, Hawaii 96734

Dear Ms. Nagamine:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

The overall public information program has been continuous since the beginning of the Project in 2005. The Alternatives Analysis phase evaluated a range of transit mode and general alignment alternatives in terms of their costs, benefits, and impacts. An initial screening process considered alternatives identified through previous transit studies, a field review of the study corridor, an analysis of current population and employment data for the study corridor, a literature review of technology modes, work completed for the Oahu Regional Transportation Plan 2030 (ORTP) prepared by the Oahu Metropolitan Planning Organization (OahuMPO) (OahuMPO 2007), and public and agency comments received during the formal Alternatives Analysis scoping process.

During the fall of 2005 and winter of 2006, the City and County of Honolulu (City) completed the alternatives screening process that is documented in the Honolulu High-Capacity Transit Corridor Project Alternatives Screening Memorandum (DTS 2006a). Scoping meetings were held, which included a presentation of alternatives to the public and interested agencies and officials to receive comments on the Purpose and Need, alternatives, and scope of the analysis for the Alternatives Analysis. Refinements were made to the alternatives. In total, 75 fixed guideway alignment options were screened.

The following alternatives were studied in the Alternatives Analysis: No Build Alternative, Transportation System Management (TSM) Alternative, Managed Lane Alternative, and the Fixed Guideway Alternative. After review of the Alternatives Analysis Report and consideration of public comments, the City Council selected a fixed guideway transit system extending from Kapolei to UH Manoa with a connection to Waikiki as the Locally Preferred Alternative. The selection, which eliminated the TSM and Managed Lane Alternatives, became Ordinance 07-001 on January 6, 2007.

Project funds paid for the public involvement activities listed in Chapter 8 of the Final EIS as required by NEPA; however, no funds were spent on "influencing" the voting process. The Project disseminated information pertaining to the Project that you may not have agreed with; however, we feel this information was accurate and relevant to properly engage the public.

Guidelines set forth by NEPA, as amended, and Chapter 343 of the Hawaii Revised Statutes stipulate that public involvement be carried out on large-scale projects such as this one. As a large infrastructure project, the City felt it was important to disseminate information to as many people as possible. Thus, a broad range of print and visual media was necessary to reach different population segments. In addition, all testimony and comments received during the public hearings will be answered and a written or electronic letter will be sent when the Final EIS is issued. However, your comments regarding your experiences with the Project have been noted.

The City held five public hearings in December 2008 throughout the study corridor. Both City employees and the City's consultants were available to answer questions. Attendees were allowed to make official comments on the Project by giving testimony to the Public Hearing Officer (which was recorded by a court reporter), providing a private statement to a court reporter, or submitting their comments in writing. More information concerning the public hearing process can be found in Chapter 8 of the Final EIS.

Your opinion of the process has been noted. The following responses address comments in your letter dated August 28, 2007:

As discussed in Section 7.4 of the Final EIS, the cost-effectiveness analysis considers whether the Project's benefit would justify its capital and operating costs. The cost-effectiveness indices for the Project compared to the baseline is within the "medium" range established by FTA for its New Starts ratings, which, along with other considerations, is currently required to qualify for New Starts funding.

Chapter 3 states that adding substantial passenger capacity in 2030 with more buses is not feasible in some key locations along the system because of roadway capacity constraints. Increasing frequency would require headways at five minutes or less. Further, the Downtown street network cannot support the number of buses that would be required to meet projected demand. As a result of growth in traffic congestion and the lack of exclusive right-of-way for transit vehicles, bus speeds have gradually declined over the past several years and would continue to decline under the No Build Alternative.

In addition, the TSM Alternative studied during the Alternatives Analysis increased bus service. The alternative included express bus service that operated as bus rapid transit in existing facilities. Bus frequencies would have been increased during peak periods to improve service for work-related trips, particularly from developing areas. The bus fleet was assumed to increase from 525 to 765 buses, and park-and-ride lots were assumed at West Kapolei, UH West Oahu, Waipio, and Aloha Stadium. The TSM Alternative would have improved transit travel times, but it would have done little to improve corridor mobility and travel reliability. Roadway congestion also would not have been alleviated.

With the Project, bus service will be enhanced and the bus network will be modified to coordinate with the fixed guideway system. Some existing bus routes, including peak-period express buses, will be altered or eliminated to reduce duplication of services provided by the fixed guideway system. Buses removed from service in the study corridor will be shifted to service in other parts of Oahu, resulting in improved transit service islandwide. Certain local routes will be rerouted or reclassified as feeder buses to provide frequent and reliable connections to the nearest fixed guideway station. Bus routes and frequencies with the Project are shown in Appendix D of the Final EIS.

Regarding toll roads, the analysis of the HOT facility in Honolulu from the Alternatives Analysis shows the cost to be $2.6 billion in 2006 dollars (higher today). This estimate was reviewed by HDOT and others familiar with HOT facilities. It is the only estimate to date that addresses Honolulu conditions. There is no substantiation of the estimate from the Tampa Bay toll facility being applicable in Honolulu. The designer of the Tampa Bay facility stated that to apply such an estimate without detailed consideration of the many differences between the two locations is not reasonable. Regarding the comparison of the Tampa Bay facility, the Transit Task Force report states that "the committee concluded that the projects are sufficiently different (actual costs versus projected costs with contingencies; available, accessible ROW vs. construction in actively used highways; no utilities relocation vs. extensive relocations) as to make the comparison unreasonable."

Regarding traffic congestion with the Project, rail will take approximately 40,000 cars off the roads and reduce congestion by 18 percent (as measured by vehicle hours of delay (VHD)). These forecasts are from a travel demand model that has been reviewed by FTA and proven effective in cities across the United States.

Your comment regarding the level of Federal funds is noted. Chapter 6 of the Final EIS describes the financial resources anticipated to pay for the capital cost of the Project and for ongoing operating and maintenance costs. Federal grants will amount to about 30 percent of the total cost of the Project.

As discussed previously, the bus network will be restructured to provide frequent and reliable connections to fixed guideway stations. As shown in Table 3-20 in the Final EIS, 90 percent of fixed guideway riders will access the system via walking, biking, or bus. In addition, four park-and-ride facilities will be provided for those wishing to drive to access the system. Lastly, the fixed guideway system could encourage new development within walking and biking distance of stations.

Regarding your comment on ridership, ridership projections for the forecast year of 2030 have been developed using the travel demand model, which was calibrated against collected traffic and transit ridership information and then validated against recent counts to be sure it properly represents travel activity in the transportation system (Section 3.2.1 of the Final EIS). An on-board transit survey was completed in December 2005 and January 2006, and the latest socioeconomic information available as of October 2008 was incorporated. Traffic counts were collected in 2005, 2007, and 2008. The model is based upon a set of realistic input assumptions regarding land use and demographic changes between now and 2030 and expected transportation levels-of-service on both the highway and public transit system. Based upon the model and these key input assumptions, approximately 116,300 trips per day are expected to use the rapid transit system on an average weekday in 2030. Since the Draft EIS was published, the travel demand model has been refined by adding an updated air passenger model (which forecasts travel in the corridor related to passengers arriving or departing at Honolulu International Airport), defining more realistic drive access modes (driving alone or car pooling) to project stations and recognizing a more robust off-peak non-home-based direct demand element (trips that do not originate at home) based on travel surveys in Honolulu.

As stated in Chapter 3 of the Final EIS, with the Project, the rate of transfers will be higher than under the No Build Alternative because of changes in local bus service to maximize access to the fixed guideway system. However, because of the high frequency of the fixed guideway service (three-minute headways between trains during peak periods), riders transferring from buses to the fixed guideway will experience minimal wait times. Riders transferring from the guideway service to buses will benefit from improved frequencies on existing bus routes serving stations. Also, several new routes with high frequencies will be provided as feeders to the guideway system. Since these routes will primarily operate in residential areas, they will provide greater reliability versus routes operating along congested arterials. The travel demand forecasting model includes a time penalty for transfers. With these characteristics in place, the transit system with the Project would still have ridership levels 44 percent higher than the No Build Alternative. While people typically try to minimize transfers on any trip, the more fundamental criterion for making a trip decision is how long the trip takes. Rail will offer people a shorter overall trip time compared to other options, even with the transfers as noted in Figure 3-7 in the Final EIS.

The funding plan is based on revenue sources already in place. Chapter 6 of the Final EIS discusses the funding sources for the Project.

The system to be built in Honolulu is similar to systems being built around the world. As noted in Chapter 2 of the Final EIS, in parallel with the alignment analysis, a five-member panel appointed by the City Council and the Mayor considered the performance, cost, and reliability of the five proposed technologies for the fixed guideway system. The panel twice accepted public

comment as part of this review. By a four-to-one vote, the panel selected steel wheel operating on steel rail as the technology for the Project evaluated in the Final EIS. The four panel members selected steel-wheel technology because it is mature, proven, safe, reliable, economical, and non-proprietary. Proprietary technologies, meaning those technologies that would have required all future purchases of vehicles or equipment to be from a single manufacturer, were eliminated because none of the proprietary technologies offered substantial proven performance, cost, and reliability benefits compared to steel wheel operating on steel rail. Selecting a proprietary technology also would have precluded a competitive bidding process, likely resulting in increased overall project costs.

Project construction is scheduled to be complete in 2018. Neither construction activities nor construction costs are scheduled to continue beyond 2018. Any other alternative that could be built in a shorter time frame would not be as effective as the fixed guideway system. The Fixed Guideway Alternative performed better at meeting the Project's Purpose and Need than any of the other alternatives evaluated in the Alternatives Analysis. A fixed guideway system will improve transit performance and reliability, be more cost-effective, and will substantially reduce VHD for all travelers, not just transit users.

A version of the system proposed by Ann Kobayashi was studied in the Alternatives Analysis phase and shown to be ineffective compared to rail.

Your other comments have been noted.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

February 3, 2009

Mr. Ted Matley
FTA Region IX
201 Mission St., Ste. 1650
San Francisco, CA 94105

Mr. Wayne Yoshioka
Department of Transportation Services
City and County of Honolulu
650 So. King St., 3rd Floor
Honolulu, HI 96813

Subject: Honolulu High Capacity Transit Corridor Project
City and County of Honolulu
Draft Environmental Impact Statement/4(f) Evaluation
November 2008

Dear Messrs. Matley and Yoshioka:

As long time residents of the Ala Moana-Sheridan neighborhood, we read with interest the Draft EIS for Honolulu's High Capacity Transit project dated November 2008.

We participated in the City and County of Honolulu's preparation of the draft Sheridan community plan in 2006, and appreciated how the vision is consistent with the City and County of Honolulu's Primary Urban Center Development Plan's designation of the Sheridan and Kaheka neighborhoods as In-Town Residential Neighborhoods. In Ala Moana-Sheridan, over 20% of the population is over 65 years old, and the proportion of elderly is steadily increasing (Draft Ala Moana-Sheridan Community Plan, 2006)." In light of this fact, the 2006 draft Plan discusses how public roads and facilities in and around our neighborhood need to be more pedestrian friendly to the elderly, general pedestrians and bicyclists. Therefore, we reviewed the Transit DEIS for a description and analysis of how access to the Transit Corridor Project would be pedestrian friendly for the Ala-Moana-Sheridan neighborhoods.

Instead, we found the Transit Corridor Project DEIS to be heading in the opposite direction making the area more congested with traffic and in turn creating a more rushed environment. The DEIS directly comments that the proposed TOD in the area will change the feel of the area, presumably making it more urban, "Because Kaka'ako has been designated a redevelopment area, changes in land uses to TOD is likely, which may result in a change in character along the alignment, especially near stations...(DEIS, p. 4-45). While we understand change is inevitable, the Transit DEIS does not even discuss basic project features such as access to the Ala Moana transit station for the affected neighborhood. Since safe and secure pedestrian access to and from the Ala Moana transit station is not discussed or analyzed in the Transit DEIS, we assume no design studies or even serious consideration has been devoted to this, the City and County of Honolulu's major public infrastructure project.

Please revise and expand the Transit DEIS to include detailed descriptions and analyses of the range of pedestrian and bicycle access ways to and from the Ala Moana station. If no consideration has yet been devoted to this project element for the Ala Moana-Sheridan community, we submit the DEIS is deficient and is not yet a complete Draft EIS.

Sincerely, Doris Nakamura

Doris Nakamura, 650 Sheridan Street PH, Honolulu, HI 96814

Y. Murata, 1224 KAMAILE ST. 96814 (address)

_____, _____(address) 795 Piikoi St 96814

_____, _____(address) 740 Sheridan St 96814

_____ _____(address) 650 Sheridan #107 96814

cc: Councilmember Duke Bainum, District 5
Senator Carol Fukunaga, District 11
Representative Tom Brower, District 23
Congressmember Neil Abercrombie
Rep. Karl Rhoads, District 28

AR00002659

DEPARTMENT OF TRANSPORTATION SERVICES

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT2/09-299053R

Ms. Doris Nakamura
650 Sheridan Street, PH
Honolulu, Hawaii 96814

Dear Ms. Nakamura:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

Many pedestrians currently use the network of sidewalks in the Ala Moana-Sheridan neighborhood. The pedestrian volume in the neighborhood will continue to grow, with or without the Project. Those walking to the station from surrounding areas will use the existing network of sidewalks. As stated in Section 2.5.5 of the Final EIS, design criteria developed for stations place highest emphasis on walk and bicycle access. Pedestrian access to stations, including accessible routes, shall be given first priority for reasons of safety.

It is estimated that most passengers using this station will transfer to or from buses directly on Kona Street. Those walking to the station from surrounding areas will use the existing network of sidewalks. Bicyclists will access the station via existing streets and/or

sidewalks in the area. The station will be designed to accommodate the expected volume of pedestrians and will provide parking for bicycles.

As indicated in Section 4.6.3 of the Final EIS, ongoing coordination efforts with the public will help develop design measures to enhance the interface between the transit system and the surrounding community. The extent, nature, and location of these design measures will be determined in Final Design through these coordination efforts.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

RT 12/08-29/320

Testimony to Honolulu High-Capacity Transit Corridor Project Public Hearing
Blaisdell Center, Draft EIS, Dec. 8, 2008

I was born and raised in Honolulu and until recently, a 30-year resident of the San Francisco Bay Area.

I feel a great deal of frustration over the rail issue. Having lived in the Bay Area for so long, I understand both the benefits of mass transit and the evils of it. As I rode the BART system to San Francisco from the East Bay suburbs every day, I passed over many decimated neighborhoods, whose vitality and quality of life was destroyed by the BART tracks slicing through communities and businesses.

Like this High-Capacity Transit project, those who pushed for BART did not adequately address serious sociological and economic impacts of the proposed rail system. Instead like Honolulu rail advocates, BART supporters were anxious for federal tax dollars. Or they wanted to rush through the project to make up for year of delay in the past. Then, as now, those motivations are riding roughshod over serious concerns about the rail system's impacts.

One thing is different now, though. We are now faced with billions of dollars of federal deficits, not to mention our own serious economic challenges in the state. There is no way the rail project will NOT meet significant cost overruns and costly delays, even if the federal government meets its promise to provide its share of capital funding – a very iffy promise given the current national economic crisis.

More importantly, Honolulu is not any other city. The potential visual impacts of the rail project have hardly been debated, and the impacts will be substantial. I can point to the tearing down of the Embarcadero Freeway in waterfront San Francisco, referenced in last night's debate, as an example of the city belatedly realizing what a treasure it obstructed in the rush to build a freeway. The same can be said of the rush to build a rail system without forethought to the environmental effects on a city that relies on its physical attraction as part of its uniqueness as both a destination location and a beloved home to its residents.

Lastly, it is apparent the high stakes the city has put on the project just by the veritable horde of consultants and staff at last night's meeting. Reference was made to the money spent on consultants to the rail project. I agree with that criticism, and add to it my anger over taxpayer-funded advertisements run endlessly before the election to PROMOTE the rail project, not provide public education.

Ann F. Nakao
909 Kapiolani Blvd, #703
Honolulu, Hi. 968
808-394-9707

'08 DEC 12 P3:
OTS
RAPID TRANSIT

Honolulu High-Capacity Transit Corridor Project

Welcome to the Honolulu High-Capacity Transit Corridor Project's Public Hearing for the Draft Environmental Impact Statement/Section 4(f) Evaluation.

This public meeting and hearing has been designed to inform the public about the transit project, explain materials contained in the Draft EIS, answer questions from the public, and collect public input on project issues related to the Draft EIS, Section 106 of the National Historic Preservation Act, Section 4(f) of the U.S. Department of Transportation Act, and floodplains affected by the project.

Please review the project information and ask project staff any questions about the project that you might have. The Draft EIS is available on the project website at www.honolulutransit.org.

You may provide official comments in several ways. Here at this Public Hearing you may provide oral comments to a court reporter who will record them for the record or use this form to provide written comments. After the meeting, you may provide an on-line comment at www.honolulutransit.org or use this form to send a written comment to the Department of Transportation Services. All comments must be postmarked or received by January 7, 2009 in order for them to be included in the Final EIS.

Name: Ann Nakao Address: 909 Kapiolani Blvd #703 Honolulu 96814

Phone: 808-394-9707

E-mail: anienakao@yahoo.com

Comment(s):

see attached

DEPARTMENT OF TRANSPORTATION SERVICES

MUFI HANNEMANN
MAYOR

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WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT12/08-291320R

Ms. Ann F. Nakao
909 Kapiolani Boulevard
Honolulu, Hawaii 96814

Dear Ms. Nakao:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

The Final EIS presents the environmental impacts of the Project on the built environment. The following resources of the affected built environment were analyzed in the Final EIS: transportation system (Chapter 3); land use (Section 4.2); economic activity (Section 4.3); acquisitions, displacements, and relocations (Section 4.4); community services and facilities (Section 4.5); neighborhoods (Section 4.6); environmental justice (Section 4.7); visual and aesthetic conditions (Section 4.8); noise and vibration (section 4.10); energy and electric and magnetic fields (section 4.11); and hazardous waste and materials (Section 4.12). In fact, the majority of the environmental analysis presented in the Final EIS pertains to impacts on the built environment versus the natural environment. The potential impacts of the Project on the built environment have been thoroughly analyzed in the environmental process and those results are presented in the Final EIS.

Section 6.3 of the Final EIS describes the anticipated funding sources for the capital cost of the Project. Capital costs of the Project, including finance charges, are expected to be fully paid by a combination of FTA Section 5309 New Starts Funds and FTA Section 5307 Funds from the Federal government and the revenues from the County General Excise Tax Surcharge levied from 2007 through 2022. As a note regarding cost overruns, the capital cost estimate includes over $1 billion in 2009 dollars in contingencies to account for such eventualities. Section 6.6 of the Final EIS describes risks and uncertainties associated with these funding assumptions. FTA has given no indication that they will not fund the Project at the levels requested.

The island's unique visual character and scenic beauty were considered in the visual and aesthetic analysis presented in the Draft and Final EISs. The assessment of visual effect due to the Project as described in Section 4.8.3 of the Final EIS considers changes to the visual landscape and viewer responses to those changes. This includes the existing development along the Project alignment. Within the Project corridor the environment changes from rural at the Wai'anae end of the corridor to dense high-rise development at the Koko Head end.

As part of the design process, the City has developed design principles, which are identified in the Honolulu High-Capacity Transit Corridor Project Compendium of Design Criteria (RTD 2009m) that will be implemented in final design to minimize visual effects of the Project. For example, guideway materials and surface textures will be selected in accordance with generally accepted architectural principles to achieve effective integration between the guideway and its surrounding environment. Landscape and streetscape improvements will mitigate potential visual impacts, primarily for street-level views.

Other measures to address visual impacts of the Project are being developed through the station design and planning process. The initial station area plans and design guidelines were first developed with coordination between DTS and the Department of Planning and Permitting (DPP). The next level of transit station design focuses on integrating individual neighborhood characteristics of the communities served by the stations.

The following mitigation framework will be included in the Project to minimize negative visual effects and enhance the visual and aesthetic opportunities that it creates:

- *Develop and apply design guidelines that will establish a consistent design framework for the Project with consideration of local context.*
- *Coordinate the project design with City TOD planning and DPP.*
- *Consult with the communities surrounding each station for input on station design elements.*
- *Consider specific sites for landscaping and trees during the final design phase when plans for new plantings will be prepared by a landscape architect. Landscape and streetscape improvements will serve to mitigate potential visual impacts.*

Section 4.8.3 of the Final EIS, Design Principles and Mitigation includes information related to the mitigation framework described above. Specifically architecture and landscape design criteria include guidelines regarding site design, materials and finishes, and lighting, which apply to stations, station areas, and the guideway.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

January 6, 2009

Mr. Wayne Y. Yoshioka
Department of Transportation Services
City and County of Honolulu
650 South King Street, 3rd Floor
Honolulu, HI 96813

Dear Mr. Yoshioka:

My comments for the EIS report.

I do have to drive around our city streets every day and almost everywhere I go bumpity bump and it bothers me that our road maintenance is so poor. It bothers me because you think it is nothing to spend these billions of dollars on the train and let our roads go to pot. It also tells me that in the future, our train and stations will not be maintained properly, too. Do you know that San Francisco's Bart is not reliable and that there is millions of dollars maintenance backlog on the BART? Bet this is the scenario for Honolulu too.

We need a billion + dollars for our sewer system to meet EPA standards. I stopped buying locally caught akule for my mother because the skin felt very slimy and the gut was huge, fat, wormy looking. (Returned fish to the store) I dare say that it was caught near the sewer outfall area. Fixing the sewer system is a MUST.

We also must have aging water pipes because we have so many water main breaks. We lose a lot of our good precious water; therefore, we must have a system of replacing these aging pipes.

To maintain our sewer and water system is a PRIORITY. People's health and welfare depends on it.

What I don't like about the train too is that is to be elevated. Plus steel on steel is very much old fashioned. Heavy steel train on elevated tracks is just ugly and very un-Hawaiian.

Most of all it is too big a cost burden for the people of Oahu – even if you get some Federal monies for building it; where is the money for the operating and maintaining coming from? Also where is the money for the acquisition of property coming from? It does not appear that the finances justify this huge, unrealistic expenditure for the City. Your projections for rider ship and finances are skewed like it was on all the huge projects elsewhere.

You know that there are other ways of solving the traffic problem without spending so much money but you are not looking at them. Where is your creativity?

Mahalo and Aloha,
Ruth Nakasone
Pearl City, HI 96782

RECEIVED
09 JAN 8 P12:24
DEPT OF TRANSPORTATION SERVICES

Cc::
Mr. Ted Matley
FTA Region IX
201 Mission Street, Suite 1650
San Francisco, CA 94105

Governor Linda Lingle
Exectuive Chambers
Hawaii State Capitol
Honolulu, HI 96813

City Council Members

RECEIVED

09 JAN 8 P12 : 24

DIRECTOR'S OFFICE
DEPT OF
TRANSPORTATION SERVICES

R T Nakasone
2216 Apoepoe St
Pearl City, HI 96782-1239

Mr. Wayne Yoshioka
Department of Transportation Services
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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT1/09-294734R

Ms. Ruth Nakasone
2216 Apoepoe Street
Pearl City, Hawaii 96782-1239

Dear Ms. Nakasone

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

As noted in Chapter 6 of the Final EIS, the funding for the Project is a dedicated source that was authorized by the State Legislature and approved by the City Council for this single use. It does not take funding from other purposes such as road repair, sewers, or other needs. The enabling legislation for the General Excise and Use Tax (GET) surcharge precludes the use of the collected funds for purposes other than a fixed guideway transit system.

Your next comments were regarding the selection of an elevated system. The Alternatives Screening Memorandum (DTS 2006a) recognized the visually sensitive areas in Kakaako and Downtown Honolulu, including the Chinatown, Hawaii Capital, and Thomas Square/Honolulu Academy of Arts Special District. To minimize impacts on historic resources, visual aesthetics, and surface traffic, the screening process considered 15 combinations of

tunnel, at-grade, or elevated alignments between Iwilei and Ward Avenue. Five different alignments through Downtown Honolulu were advanced for further analysis in the Alternatives Analysis, including an at-grade portion along Hotel Street, a tunnel under King Street, and elevated guideways along Nimitz Highway and Queen Street (Figure 2-4).

The Alternatives Analysis Report (DTS 2006b) evaluated the alignment alternatives based on transportation and overall benefits, environmental and social impacts, and cost considerations. The report found that an at-grade alignment along Hotel Street would require the acquisition of more parcels and could potentially affect more burial sites than any of the other alternatives considered. The alignment with at-grade operation Downtown and a tunnel under King Street, was not selected because of the environmental effects, such as impacts to cultural resources, reduction of street capacity, and property acquisition requirements of the at-grade and tunnel sections, which would cost an additional $300 million.

The Project's purpose is "to provide high-capacity rapid transit" in the congested east-west travel corridor (see Section 1.7 of the Final EIS). The need for the Project includes improving corridor transit mobility and reliability. The at-grade alignment would not meet the Project's Purpose and Need because it could not satisfy the mobility and reliability objectives of the Project (see bullets below). Some of the technical considerations associated with an at-grade versus elevated alignment through Downtown Honolulu include the following:

- ***System Capacity, Speed, and Reliability**—The short, 200-foot (or less) blocks in Downtown Honolulu would permanently limit the system to two-car trains to prevent stopped trains from blocking vehicular traffic on cross-streets. Under ideal operational circumstances, the capacity of an at-grade system could reach 4,000 passengers per hour per direction, assuming optimistic five minute headways. Based on travel forecasts, the Project should support approximately 8,000 passengers in the peak hour by 2030. Moreover, the Project can be readily expanded to carry over 25,000 in each direction by reducing the interval between trains (headway) to 90 seconds during the peak period. To reach a comparable system capacity, speed, and reliability, an at-grade alignment would require a fenced, segregated right-of-way that would eliminate all obstacles to the train's passage, such as vehicular, pedestrian, or bicycle crossings. Even with transit signal priority, the at-grade speeds would be slower and less reliable than an elevated guideway. An at-grade system would travel at slower speeds due to the shorter blocks, tight and short radius curves in places within the constrained and congested Downtown street network, the need to obey traffic regulations (e.g., traffic signals), and potential conflicts with other at-grade activity, including cars, bicyclists, and pedestrians. These effects mean longer travel times and far less reliability than a fully grade-separated system. None of these factors affects an elevated rail system. The elevated rail can travel at its own speed any time of the day regardless of weather, traffic, or the need to let cross traffic proceed at intersections.*

- ***Mixed-Traffic Conflicts**— The Project will run at three minute headways. However, three-minute headways with an at-grade system would prevent effective coordination of traffic signals in the delicately balanced signal network in*

downtown Honolulu. A disruption of traffic signal cycle coordination every three minutes would severely affect traffic flow and capacity of cross-streets. Furthermore, there would be no option to increase the capacity of the at-grade rail system by reducing the headway to 90 seconds, which would only exacerbate the signalization problem. An at-grade system would require removal of two or more existing traffic lanes on affected streets. This effect is significant and would exacerbate congestion. Congestion would not be isolated to the streets that cross the at-grade alignment but, instead, would spread throughout Downtown. The Final EIS shows that the Project's impact on traffic will be isolated and minimal with the elevated rail, and, in fact will reduce system-wide traffic delay by 18 percent compared to the No Build Alternative (Table 3-14 in the Final EIS). The elevated guideway will require no removal of existing through travel lanes, while providing a reliable travel alternative. When traffic slows, or even stops due to congestion or incidents, the elevated rail transit will continue to operate without delay or interruption.

An at-grade light rail system with continuous tracks in-street would create major impediments to turning movements, many of which would have to be closed to eliminate a crash hazard. Even where turning movements are designed to be accommodated, at-grade systems experience potential collision problems. In addition, mixing at-grade fixed guideway vehicles with cars, bicyclists, and pedestrians presents a much higher potential for conflicts compared to grade-separated conditions. Where pedestrian and automobiles cross the tracks in the street network, particularly in areas of high activity (e.g., station areas or intersections), there is a risk of collisions involving trains that does not exist with an elevated system. There is evidence of crashes between trains and cars and trains and pedestrians on other at-grade systems throughout the country (e.g., Phoenix, Houston, LA). This potential would be high in the Chinatown and Downtown neighborhoods, where the number of pedestrians is high and the aging population presents a particular risk.

- ***Construction Impacts***—*Constructing an at-grade rail system could have more effects than an elevated system in a number of ways. The wider and continuous footprint of an at-grade rail system compared to an elevated rail system (which touches the ground only at discrete column foundations, power substations, and station accessways) increases the potential of utility conflicts and impacts to sensitive cultural resources. In addition, the extra roadway lanes utilized by an at-grade system would result in increased congestion or require that additional businesses or homes be taken to widen the roadway through Downtown. Additionally, the duration of short-term construction impacts to the community and environment with an at-grade system would be considerably greater than with an elevated system. Because of differing construction techniques, more lanes would need to be continuously closed for at-grade construction and the closures would last longer than with elevated construction. This would result in a greater disruption to business and residential access, prolonged exposure to construction noise, and traffic impacts.*

Because it is not feasible for an at-grade system through Downtown to move passengers rapidly and reliably without significant detrimental effects on other transportation system elements (e.g., the highway and pedestrian systems, safety, reliability, etc.), an at-grade system would have a negative system-wide impact that would reduce ridership throughout the system. The at-grade system would not meet the Project's Purpose and Need and, therefore, does not require further analysis.

Lastly, to address your questions regarding the cost of the Project, the Project costs discussed in Chapter 6 of the Final EIS include the cost of property acquisition. This chapter also describes the financial resources anticipated to be needed to pay for the capital cost of the Project and for ongoing operating and maintenance costs. Capital costs (including property acquisitions) of the Project, including finance charges, are expected to be fully paid for by a combination of FTA Section 5307 and FTA Section 5309 New Starts Funds from the Federal government and revenues from the County GET Surcharge levied from 2007 through 2022 on Oahu. Operating and maintenance costs include costs associated with maintaining the transit system in a state of good repair and will be paid for from the same sources currently used for TheBus: Federal funding, fare revenues, and subsidies from the City's General and Highway Funds. Ridership forecasts follow detailed guidance established by the FTA for this type of project.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

24786.

NATIVE HAWAIIAN LEGAL CORPORATION

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January 30, 2009

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TRANSPORTATION SERVICES

I am writing on behalf of Paulette Ka'anohiokalani Kaleikini, who has retained the services of the Native Hawaiian Legal Corporation in order to protect *iwi* along the proposed transit corridor from unnecessary disturbance.

The City has failed to provide adequate information on the risks of encountering ancient Hawaiian burial remains (iwi kūpuna) in the Draft Environmental Impact Statement despite the clear requirements of the National Environmental Policy Act, section 106 of the National Historic Preservation Act, HRS Chapter 343, HRS Chapter 6E and the Hawai'i Constitution Art. XII § 7. Prior to decisionmaking, the City must have sufficient information to objectively evaluate the impacts of the high-capacity transit system on native Hawaiian burials. With this information the City can reach an informed decision on (a) whether to move forward with the project and (b) how the project can be redesigned or re-routed so that burials are <u>not</u> affected.

Services made possible with major funding from the Office of Hawaiian Affairs.

LSC

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The Statutory Scheme for Protecting Iwi Kūpuna. Under the statutory schemes provided by both HEPA, NEPA, and the NHPA, decision-makers must gather the required relevant information that will allow it to *avoid* disturbances of and impacts on preexisting iwi kūpuna, with as much advance information on them so the chances of desecrating them during construction are minimized and ultimately eliminated. A contractor building the rail system should not have to move iwi kūpuna in the midst of construction, if proper investigation and burial identification is completed prior to decisionmaking.

The State Constitution provides that the:

> ... State shall protect all rights, customarily and traditionally exercised for subsistence, cultural and religious purposes and possessed by ahupua`a tenants who are descendants of native Hawaiians who inhabited the Hawaiian Islands prior to 1778, subject to the right of the State to regulate such rights.

Haw. Const. Art. XII § 7. As such, the State and all its agencies are "required under the Hawaii Constitution to preserve and protect customary and traditional practices of native Hawaiians." *Ka Pa'akai O Ka`aina v. Land Use Comm'n*, 94 Hawai`i 31, 45 (2000). This places the State under "an affirmative duty" to "protect these rights and to prevent any interference with the exercise of these rights." Id. In order to fulfill its duty to preserve and protect customary and traditional native Hawaiian rights to the extent feasible, the state and its political subdivisions:

> must -- at a minimum -- make specific findings and conclusions as to the following: (1) the identity and scope of "valued cultural, historical, or natural resources" in the ... area, including the extent to which traditional and customary native Hawaiian rights are exercised in the petition area; (2) the extent to which those resources --including traditional and customary native Hawaiian rights -- will be affected or impaired by the proposed action; and (3) the feasible action, if any, to be taken . . . to reasonably protect native Hawaiian rights if they are found to exist.

Ka Pa`akai 94 Haw. at 47; See also HRS §§ 205A-4(a), 205A-2(b)(2) and 205A-5(b).

Under HRS chapter 6E, the Island Burial Councils, consisting of a majority of cultural practitioners sensitive to burial matters, have primary jurisdiction over the fate of the iwi kūpuna at rest in "previously identified" burial sites. HRS § 6E-43; HAR § 13-300-33. On the other hand, if those same burials are "inadvertently discovered" because no archaeological inventory survey identified and located them beforehand, the staff of the SHPD must determine the treatment disposition of these burials. HRS § 6E-43.5; HAR § 13-300-40. The only rational reading of this statute is that the island burial council should be given as much information as early as possible in order to assure the proper treatment of any burial remains which could be impacted by development. Accordingly, the State Historic Preservation Division (SHPD) must assure that the councils get as much timely and complete information on the presence and location of iwi kūpuna as possible, so the council may properly exercise its role.

Moreover, the environmental review process requires in part the completion of a "cultural impact assessment" that is designed to shed light on a full range of issues, including the presence of iwi kūpuna which could be impacted by any development. HRS chapter 343. *The Sierra Club v. State Department of Transportation* , 115 Haw. 299, 319; 167 P.3d 292, 326 (2007), citing *Sierra Club v. Hawai'i Tourism Auth.*, 100 Hawai'i 242, 266, 251, 59 P.3d 877, 886, 901 (2002) (declaring that the main thrust of HEPA is to require agencies to consider the environmental effects of projects before action is taken.) This information should be provided at the earliest practicable time in the development review process. *Id.* at 320, 167 P.3d at 327 (mandating an environmental assessment for such action at the earliest practicable time to determine whether an environmental impact statement is required).

Furthermore, Section 106 of the National Historic Preservation Act of 1966 (Public Law 102-575) mandates, in part:

> The head of any Federal agency having direct or indirect jurisdiction over a proposed Federal or federally assisted undertaking in any State and the head of any Federal department or independent agency having authority to license any undertaking shall, prior to the approval of the expenditure of any Federal funds on the undertaking or prior to the issuance of any license, as the case may be, take into account the effect of the undertaking on any district, site, building, structure, or object that is included in or eligible for inclusion in the National Register. ...

(Emphasis added). 16 U.S.C. 470f.

The implementation of Section 106 therefore mandates that any federal agency providing financial support for any undertaking engage in *advance* consultation with affected native Hawaiian organizations who attach religious and cultural significance to historic properties which may be affected. That consultation must precede any choice of alternatives. See, http://www.achp.gov/regs-nhos.html for specific official Advisory Council on Historic Preservation guidance in conforming to these consultation requirements.[1]

A History of Desecration. In recent years, hundreds of burials have been disturbed in urban Honolulu – most of them *after* projects have been approved, contrary to legislative intent. Repeatedly, in dozens of construction projects conducted within the Honolulu urban corridor, the SHPD summarily approved commencement of construction without archaeological inventory

---

[1] In particular, the federal guidelines for this process specifies:

> The agency must make a reasonable and good faith effort to identify Native Hawaiian organizations that might attach religious and cultural significance to historic properties in the area of potential effects and invite them to be consulting parties.
>
> . . .
>
> The agency consults with Native Hawaiian organizations to develop and evaluate alternatives to avoid, minimize, or mitigate adverse effects.

surveying in advance. For example, as the SHPD argued in a legal challenge to its handling of the construction of the Keeaumoku Wal Mart store,

> ... Because the probability of historic sites including burials in the area was low, the State did not recommend any further archeological work for the project. ... Because of the history of this area, land use, environmental data, and the low incidence of burials in surrounding and nearby areas, this project was treated the same as numerous other projects in the nearby and surrounding areas. See Declaration of Sara Collins.

Hui Malama I Na Kūpuna O Hawai`i Nei v. Wal-Mart, Civ. No. 03-1-1112-05 (1st Cir. Ct. 2003), Defendants State of Hawaii, Department of Land and Natural Resources, State Historic Preservation Division, Peter Young, and Holly McEldowney's Memorandum in Opposition to Plaintiffs' Motion for Preliminary Injunction filed June 20,2003 (hereafter, "2003 SHPD Memo"). In 2003, the SHPD, and developers in general whose projects it reviewed, repeatedly and systematically allowed minimal archaeological review of areas such as the Keeaumoku Wal Mart site, under the mistaken presumption that no burials were likely to be present in such circumstances. This approach was egregiously wanting in terms of protecting these public trust resources.

Following this time period, officials at the State Historic Preservation Division belatedly recognized that its previous presumption that no further archaeological survey work in the Honolulu urban corridor was necessary due to prior ground disturbances might be false, given a pattern of unexpected disturbances:

> 21. According to SHPD records, between 1986 and 2002, in the areas from River Street to Keaumoku Street, and from Nimitz and King Street, 308 human burials have been found on twenty-six different project sites. Five burials in two projects were preserved in place, and 303 burials were relocated.
>
> 22. The 303 burials that were relocated include all of the remains that could have been considered a concentration such as 116 burials found during archeological monitoring of the Queen Street widening project near Kawaihao Church Cemetery, or the 11 burials (of 25 total relocated) from the Honuakaha Smallpox Cemetery that were found during an inventory survey conducted for the Brewery/Honuakaha development project.

Declaration of Sara Collins, attached to 2003 SHPD Memo. Thus, according to the SHPD, its own data confirmed that hundreds of iwi kūpuna had been systematically disturbed by construction activity within the Honolulu urban corridor for 16 years because of the failure to require advance archaeological inventory surveying. The SHPD allowed the vast majority, 303 of the 308 remains, to be relocated. The mistaken presumption was that prior ground disturbing construction activity within this urban corridor obviated the need to look further.

Simultaneously, the City and County of Honolulu avoided professional reviews of sites targeted for development by failing to submit proposed permits to the SHPD for professional review and comment as required under HRS § 6E-42. These failures to implement that statute are currently on appellate review by the Hawai'i Supreme Court. Appellate review was necessitated by the City's refusal to reasonably interpret its trust obligations to request review and comment from the SHPD under that statute. The City contends that, notwithstanding its total lack of expertise in the area, its own unilateral assessment of the potential impact on iwi kūpuna of pending permit applications is all that is required.

Usurpation of the Role of the Burial Council. Most disturbing, this pattern of relying on prior ground disturbances to relax more rigorous archaeological analysis has sadly resulted in other more serious procedural consequences. Had properly conducted archaeological surveys identified and located burials in advance of construction, the work of the O'ahu Island Burial Council could begin in earnest and with the luxury of time to process all the information, in advance of any pressured environment once construction starts. This would provide iwi kupuna with the dignity and respect they clearly deserve.

Accordingly, the failure to rigorously attempt to identify and locate iwi kūpuna so they are categorized as "previously identified" resulted in the transfer of power and accountability for protecting burials from the island burial council, consisting primarily of cultural practitioners sensitive to burial concerns, to the professional archaeological staff at the SHPD, which is less equipped to deal with the cultural appropriateness of these issues and are saddled with the pressure placed on them by the relationships between state administrative officials and developers. Moreover, when "inadvertently discovered" iwi kūpuna are subject to disposition determination by the SHPD staff, it technically has only 2-3 days to make that determination, typically under the financial pressures facing the developer who must otherwise halt construction. In contrast, the island burial council typically has 90 days to act on a "previously identified" burial site, after it has had a chance to identify cultural and lineal descendants notified of the presence of burials in an area. This extended period and less pressured atmosphere allows for better decisions on often sensitive and contentious matters.

Lessons Learned. This systemic desecration of iwi kūpuna for at least 16 years (and probably longer) apparently caught no one's attention until the Wal Mart litigation, and then subsequently in the legal challenge to the SHPD's handling of the General Growth Properties construction of the future Whole Foods store site and planned condominium complex at its nearby Auahi Street properties. *Kaleikini v. Young*, Civ. No. 07-1-0067-01 RKOL (1st Cir Ct 2006).

During the *Wal Mart* litigation, the SHPD suggested it acknowledged lessons from its past failings in summarizing the data it had been accumulating:

> 8. The nature and extent of prior ground disturbance and development may be a reliable indicator of the probable presence or absence of subsurface historic sites. If

prior buildings or structures have not had deeply excavated foundations or pilings, or if there has been little or no prior installation of such features as underground storage tanks or wastewater systems, it is more likely that historic sites, including human burials, are still present below the ground surface.

9. With regard to underlying soil characteristics, there is generally a higher probability of subsurface historic sites, including human burials, in areas underlain by sand deposits.

10. Historical data - such as, inter alia, early written accounts or records, maps, and Mahele information - can indicate the potential for subsurface historic sites, if the subject parcel has not undergone substantial, subsequent modification.

11. Previous archeological work - including inventory survey, data recovery, and monitoring - provides valuable information on the probable presence or absence of subsurface historic sites. Archeological reports on such work normally contain descriptive data of any historic sites found, and include stratigraphic profiles of the buried cultural layers and underlying soil deposits.

Declaration of Sara Collins, attached to 2003 SHPD Memo. These same lessons bear on the current proposed construction of the Rail Transit system.

There is a growing body of knowledge and information about the presence and location of iwi kūpuna along the contemplated rail transit route. The City needs to conscientiously search for and obtain as much advance information on the location of iwi kūpuna along its entire route as early as possible to effect reasoned decision-making on the routing of the system. It should not be swayed by previous ground disturbances that do not impact subsurface features, like iwi kūpuna. It should be conscious of the presence of sand deposits anywhere developments are proposed. It should review the growing knowledge base from past projects which have unearthed burials and build upon that material and information.

Need for Correction. The failure to follow the law has already disrupted hundreds of what should have been "previously identified" burials in the urban corridor between River and Keaumoku Streets. These are properties which have immense religious and cultural significance to Hawaiians. Had the statutes been followed, subsequent construction activity should never have "inadvertently discovered" these burials and forced their relocation. Repeating these same mistakes with the planned mass transit construction will undermine state and federal statutes designed to protect historic properties of this sort.

Given the high likelihood that burials are located along the route of the proposed transit corridor, clearly past practices must change. The law and the importance of protecting the dignity of these burials require no less.

In short, well in advance of any planning and design decisions, the City should perform an archaeological inventory survey, including subsurface testing, of all areas where (1) stations could be located (b) support pillars could be located and (c) existing underground infrastructure will be moved. It is highly inappropriate and offensive to iwi kupuna and native Hawaiians to delay such testing until after decisionmaking. The information generated AFTER such surveys must and should be included in any DEIS, in order to give the public, interested Hawaiian organizations, and individuals the opportunity to comment on it. Under HEPA, NEPA, and HRS chapter 6E, this information is needed now to ensure that an informed decision is made. Additionally, any delay could jeopardize federal funding because of failure to comply with Section 106 of the NHPA, particularly in developing alternatives to the transit routing.[2] Federal guidelines would restrict taking any action that fails to account for the views of affected native Hawaiian organizations.

In fact, page 4-143 of the DIES states "Native Hawaiian testimonies in Land Commission Award claims indicate that there are documented burials within the study corridor." By acknowledging it has this information, the City is duty-bound to suspend its current approach and comply with the statutory schemes designed to protect these historic properties of religious and cultural significance to so many Hawaiians. Much more advance investigation and surveying is required before any DEIS is made public for comment.

In truth, the contemplated action in the DEIS has it backwards. On page 4-163, the DEIS reads, "Prior to construction, additional archaeological work would be completed to investigate the potential for sub-surface deposits. This additional work would focus on locations of columns, once they are known." Contrary to this proposed approach, the City must first investigate and generate information regarding burial sites so that the City will not locate columns, stations and other underground work where known burial sites are identified and located.

Moreover, the City cannot and should not avoid information that would help locate and identify such historic properties. Instead, it should affirmatively and aggressively attempt to ..

---

[2] Specifically, the Advisory Council on Historic Preservation requires, in part, the development of alternatives in consultation with native Hawaiian organizations:

> Involvement of Native Hawaiian organizations in the development of program alternatives
>
> - The agency must consult with affected Native Hawaiian organizations in the development of program alternatives.
> - If a program alternative may affect historic properties of religious and cultural significance to a Native Hawaiian organization, the agency shall identify those organizations and consult with them.
> - The agency and ACHP must take into account the views of Native Hawaiian organizations in reaching a final decision.

See, Advisory Council on Historic Preservation at: http://www.achp.gov/regs-nhos.html.

gather it so complete information is available to generate alternatives, as contemplated under the Section 106 process. The City should also include all this information in this version of the DEIS. Its omission denies affected native Hawaiian organizations the opportunity to be truly engaged and involved in consulting with the applicable federal agency so that these organizations can have a substantive role in the alternatives developed. If it ignores the omitted information, the City will be proceeding down a treacherous path that can only lead to unnecessary delay and cultural conflict.

Ms. Kaleikini has additional concerns about the completeness of the DEIS and urges the City to address these points as follows:

- The DEIS includes no meaningful information regarding the impact on burial sites or any discussion regarding alternatives to affecting these sites. This information is crucial to any development of alternatives as required by federal law.
- Section 4.1 of the DEIS regarding existing land uses should explicitly recognize that burial sites are an existing land use along this corridor.
- Section 4.3 of the DEIS should discuss whether the City plans to displace and relocate existing burial sites and give details about the timing, location and process related to each of these relocations and displacements.
- Section 4.6 of the DEIS should note that desecration – including the relocation – of existing burial sites – is an issue of environmental injustice. The DEIS should, as such, discuss the impact of continuing the pattern set by previous developments, especially in the Honolulu urban core, as outlined above.
- Section 4.17 should be revised in the same manner sections 4.1, 4.3 and 4.6 should be.

Most importantly, these sections of the DEIS need to be amended to identify where burial sites may be so that stations, pillars and underground infrastructure work can be proposed in areas that will not affect burial sites. The need for developing alternatives is crucial and affording affected native Hawaiian organizations the ability and the opportunity to consult on these alternatives is essential. Without the supporting information to allow for a discussion of alternatives, the DEIS is fatally flawed.

Sincerely,

Camille K. Kalama
Attorney for Ms. Kaleikini

DEPARTMENT OF TRANSPORTATION SERVICES

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June 11, 2010

RT2/09-297862R

Ms. Camille K. Kalama
Native Hawaiian Legal Corporation
1164 Bishop Street, Suite 1205
Honolulu, Hawaii 96813

Dear Ms. Kalama:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

In your letter, you raise various issues specifically and generally. Your overarching concern appears to be related to the possibility that the Project may encounter native Hawaiian burials, the process that DTS followed regarding these resources, and whether sufficient information has been provided to decision makers regarding these resources. The following discussion addresses these concerns and others raised in your letter. In your letter, you also provided a bullet-point list of specific recommendations. Those are addressed on the last page of this letter.

The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The identification of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative. 23 CFR § 771.125 (a)(1). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261,

identifying the Airport Alternative as the Project to be the focus of the Final EIS. Chapter 2 of the Final EIS describes this identification process. The Final EIS also includes additional information and analyses, as well as minor refinements to the Project that were made to address comments received from agencies and the public on the Draft EIS.

The purpose of the Project is to provide high-capacity rapid transit in the highly congested east-west transportation corridor between Kapolei and UH Mānoa, as specified in the O'ahu Regional Transportation Plan (O'ahu MPO 2007). See Sections 1.7 and 1.8 of the Final EIS. The need for the Project is based on the following goals: Improve corridor mobility, Improve corridor travel reliability, Improve access to planned development to support City policy to develop a second urban center, and Improve transportation equity.

As discussed in Section 2.5.10 and shown in Figure 2-41 of the Final EIS, DTS proposes constructing the Project in four phases East Kapolei to Pearl Highlands, Pearl Highlands to Aloha Stadium, Aloha Stadium to Middle Street, and Middle Street to Ala Moana Center. As shown in Figure 2-42 of the Final EIS, each construction phase will start in the following years 2010, 2011, 2012, and 2013, respectively. As discussed below, an archaeological inventory survey (AIS) will be completed for each phase prior to construction, as stipulated in the Project's Programmatic Agreement (PA), prepared pursuant to Section 106 of the National Historic Preservation Act of 1966 (NHPA). See Section 5.4 of the Final EIS. An AIS has already been completed for the first construction phase between East Kapolei and Pearl Highlands in consultation with the State Historic Preservation Division (SHPD) and the Oahu Island Burial Council (OIBC).

The Project is unlike the facts in Hui Malama I Na Kupuna O Nei v. Wal-Mart, 223 P.3d 236 (Haw. Ct. App. 2009), cert. rejected, 2010 WL 1973594, May 17, 2010, which you cited in your letter. In that case, the Intermediate Court of Appeals (ICA) of the State of Hawaii affirmed the trial court's holding. The trial court held that the City Department of Planning and Permitting's (DPP) determination that a property slated for construction of a Wal-Mart and Sam's Club was not likely to affect historic property or burial sites; and therefore, DPP did not need to consult with SHPD prior to issuing grading and grubbing permits under HRS § 6E-42. DPP's determination was based on a review of its comprehensive computer database of historic sites and known burials, and knowledge that the Wal-Mart/Sam's Club property had been extensively developed and used for commercial and industrial purposes for over fifty years. The Project is doing much more than what the ICA allowed in Hui Malama. Unlike Hui Malama, the Project has already conducted archaeological and cultural reports, as discussed below. In addition, the Project will conduct an AIS prior to each construction phase. The City has consulted with, and continues to consult with, SHPD and OIBC. Any native Hawaiian burials discovered during the AIS will be treated as previously identified burial sites. This ensures that OIBC remains intimately involved in any discussion related to the treatment of native Hawaiian burials.

Under HRS § 6E-42, the provision you cite in your letter, the City must consult with SHPD prior to the issuance of state or county land use entitlements if the Project "may affect historic property . . . or a burial site." In addition to the studies already prepared and the consultation with SHPD and OIBC already conducted and ongoing, the City will conduct an AIS for each construction phase of the Project. As discussed herein, this is the best approach for identifying native Hawaiian burials that may be affected by the Project. During the NEPA and Section 106 process, the FTA limits the level of design and engineering that project sponsors

can conduct on their projects so as to not prejudice the consideration of alternatives, including the no action alternative. Consequently, the placement of column foundations is a design activity that requires a level of design that typically takes place after the NEPA and Section 106 processes conclude. To balance the current level of project design, the desire to limit disturbance of native Hawaiian burials and residences in Phase IV of the project area, and the potential transportation benefits that would accrue from the proposed Project, a detailed approach for conducting archaeological investigations for Phase IV for the Project was developed in the PA. As part of the Section 106 consultation process and preparation of the PA, there was extensive consultation with various parties including the following: OIBC, the Office of Hawaiian Affairs, Hui Malama in Na Kupuna O Hawaii Nei, the Royal Order of Kamehameha, the Ahahui Kaahumanu, the Daughters and Sons of the Hawaiian Warriors, the Association of Hawaiian Civic Clubs, the Ahahui Siwila Hawaii O Kapolei, the Alii Pauahi, the Ewa-Puuloa Hawaiian Civic Club, the Honolulu Hawaiian Civic Club, the King Kamehameha Hawaiian Civic Club, the Kalihi-Palama Hawaiian Civic Club, the Pearl Harbor Hawaiian Civic Club, the Merchant Street Hawaiian Civic Club, the Nanaikapono Hawaiian Civic Club, the Princess Kaiulani Hawaiian Civic Club, the Waianae Hawaiian Civic Club, the Wahiawa Hawaiian Civic Club, and the Waikiki Hawaiian Civic Club.

DTS recognizes in Figure 4-73 of the Final EIS that the area of the Project with the highest likelihood of encountering native Hawaiian burials is in Phase IV. The proposed schedule for starting Phase IV construction is 2013. Although the development of more detailed design, and therefore archaeological investigations, for the last construction phase would have typically been delayed until closer to the anticipated construction start date, DTS has committed to starting the process much earlier. As stated in the PA,

> *Within 60 days of execution of this PA, the City shall consult with the OIBC, lineal and cultural descendents, and other interested parties that are identified in discussion with OIBC, about the scope of investigation for the AIS Plan for construction of Phase 4. The City shall provide Preliminary Engineering plans and existing utility maps to assist in the scoping process. The AIS Plan will provide for investigation of the entire Phase 4 area, including from Waiakamilo Road to Ala Moana Center. In the portion of Phase 4 with the greatest potential for resources, the AIS Plan will evaluate all areas that will be disturbed by the Project. The AIS Plan will include a review of historical shoreline location, soil type, and, where indicated by conditions, the survey measures listed in Stipulation III.C, including subsurface testing, for each column location, utility relocation, and major features of each station and traction power substation location based on Preliminary Engineering design data.*

The plan developed through this consultation would need to be submitted to SHPD within four months of execution of the PA. Archaeological investigations would start after SHPD approves the plan within 30 days of receipt. The City would be required to complete the archaeological investigations during a period of time where there is still flexibility in project design. In addition, within six months of the execution of the PA, the City, in coordination of the OIBC, shall complete a draft protocol for consultation regarding treatment of any native Hawaiian burials identified during the AIS. The protocol would also include a workflow of avoidance alternatives, which might include the relocation of columns, change in column design from a center alignment to a straddle bent or other alternatively supported design, modification of span length, and alternate utility locations.

The Final EIS discussion on native Hawaiian burials was compiled in good faith and sets forth sufficient information to enable the decision maker to make an informed decision regarding the significant impacts on the environment, including native Hawaiian burials and cultural resources, as discussed in Section 4.16 of the Final EIS entitled, Archaeological, Cultural, and Historic Resources. The evaluation of impacts to native Hawaiian burials discussed in the Final EIS is supported by various studies including the Honolulu High-Capacity Transit Corridor Project Archaeological Resources Technical Report (RTD 2008n), the Honolulu High-Capacity Transit Corridor Project Historic Resources Technical Report (RTD 2008o), the Honolulu High-Capacity Transit Corridor Project Cultural Resources Technical Report (RTD 2008p), the Honolulu High-Capacity Transit Corridor Project Addendum 01 to the Historic Resources Technical Report (RTD 2010), and the Honolulu High-Capacity Transit Corridor Project Historic Effects Report (RTD 2009d). All technical reports referenced in this letter and in the Final EIS are available from DTS and on the Project website at www.honolulutransit.org.

Identification and protection of native Hawaiian burials was carried out in the Cultural Resources Technical Report, dated August 1, 2008, prepared for and referenced in the Draft and Final EISs. The Cultural Resources Technical Report was prepared by Lani Ma'a Lapilio. Ms. Lapilio earned her juris doctorate and is the former Principal of Ku'iwalu, a Native Hawaiian business specializing in cultural resource compliance, community outreach, and public affairs. Her former positions include executive director of the Judiciary History Center and legal counsel for the Office of Hawaiian Affairs, Native Hawaiian Historic Preservation Council. Ms. Lapilio currently serves as the Hawai'i Advisor to the National Trust for Historic Preservation and is the at-large member on the National Trust's Executive Committee. The Cultural Resources Technical Report was prepared in large part to identify traditional and customary practices of native Hawaiians within the project area. The extensive efforts to identify, contact, and consult with individuals, organizations, and agencies specifically sought to develop data on native Hawaiian burials and native Hawaiian burial concerns. See, e.g., Cultural Resources Technical Report at Sections 4.3.2, 5.2.1, and 5.2.4. Several cultural informants provided information regarding native Hawaiian burials. See, e.g., Cultural Resources Technical Report at F-4, F-8 (comments of Louis Agard, Jr.), F-10 (comments of Claire Pruet); and F-24, F-25 (comments of Shad Kane). Land documents were examined to identify any accounts of native Hawaiian burials. See, e.g., Cultural Resources Technical Report at 5-7, H-5, and H-6.

The Archaeological Resources Technical Report, dated August 15, 2008, prepared for and referenced in the Draft and Final EISs, lists burials as the first category of resources to be identified. See, e.g., Archaeological Resources Technical Report at S-1, Table S-1, and Section 3.4. The Archaeological Resources Technical Report identifies (Section 6.2) a number of steps to protect native Hawaiian burials, including a multi-step approach of: (1) preparation of an Archaeological Inventory Survey Plan, (2) use of Ground Penetrating Radar, (3) completion of an Archaeological Inventory Survey, (4) Archaeological Data Recovery (as appropriate), and (5) an Archaeological Monitoring Program (to begin with an Archaeological Monitoring Plan). Each of these additional archaeological studies is to be reviewed and accepted by SHPD prior to groundbreaking for each construction phase. See Archaeological Resources Technical Report at Section 3.5.2.

Even prior to the preparation of the EIS, efforts to address the possibility of encountering native Hawaiian burials began during the Alternatives Analysis phase of the Project. As discussed in Chapter 2 of the Final EIS, environmental factors that were considered during the Alternatives Analysis phase included land use and economic activity, displacements,

neighborhoods and communities, farmlands, visual and aesthetic resources, air quality and energy, noise and vibration, water resources, natural resources, and cultural, historic, and archaeological resources. During the Alternatives Analysis phase, the City consulted with SHPD regarding historic properties and evaluated the likely effect to historic properties of each alternative. The outcome is documented in the Honolulu High-Capacity Transit Corridor Project Alternatives Analysis Historic and Archaeological Technical Report (DTS 2006e). The Federal undertaking was defined by selection of the Locally Preferred Alternative (LPA). Following the selection of the LPA, the City and FTA initiated consultation under Section 106.

The Archaeological Technical Report, dated August 28, 2006 (see Pages 2 and 3), was prepared to support the Alternatives Analysis and specifically evaluated potential impacts to burials and the potential impact of various proposed alternatives summarizing the available information pertaining to the previous identification of burials. See, e.g., Archaeological Technical Report at 4-1, 4-2, 4-11, 4-13, 4-14, 4-15, 4-25, 4-27, 4-28, 4-41, 4-43, 4-44, 4-51, 4-53, 4-54, 4-56, 4-61, 4-62, and 4-64 to 4-75. The data on the presence of native Hawaiian burials was a specific category of analysis taken into consideration in route and alternative selection. See, e.g., Archaeological Technical Report at 5-94, 5-96, 5-97, 5-99, 5-101, 5-102, 5-104, 5-105, 5-106, 5-108, 5-112, 5-113, 5-114, 5-116, 5-123, and 5-133. This study took into account available data on soil types, previously recorded archaeological resources, historic land records, and previously recorded burial locations.

The City specifically evaluated potential impacts to burials and specifically evaluated the potential impacts of various proposed alternatives in consideration of the data provided in the Archaeological Technical Report dated August 28, 2006. Follow-through with and implementation of the approaches listed in the Archaeological Resources Technical Report and summarized above will provide the City with information on the risks of encountering native Hawaiian burials prior to the beginning of the construction work. The preparation of the Cultural Resources Technical Report for the Draft EIS and the extensive and continuing consultation with native Hawaiian individuals, groups, and agencies has been a good faith effort to assess cultural impacts.

As you have noted, Land Commission Award (LCA) claims associated with the Project corridor indicate the possibility of burials within the project corridor—specifically in two cases. In the case of LCA 247 to Charles Kanaina, this is a vast alii claim involving many lands; and it in fact appears most likely that the burials referred to were in a former alii mausoleum on the grounds of the present Iolani Palace (well away from the project corridor). In the second case, LCA 30 to Kahoowaha, it appears there were two apana located mauka of Nimitz Highway between Kekaulike Street and Maunakea Street. Our studies to date indicate that one of the two LCA 30 apana did indeed have a narrow flaglot extension as far south as the Nimitz Highway right-of-way. This general area has indeed been associated with a number of burial finds. We certainly agree that this specific area of LCA 30 extending to Nimitz Highway merits consideration of avoidance. Certainly, intensive subsurface testing well in advance of construction in the vicinity will be in order to allow for relocation of column foundations away from any sensitive areas.

In addition to the issues raised in your letter, we address your bullet-point suggestions as follows:

- *The Final EIS includes information regarding the impact of the Project on burial sites and a discussion on how to avoid those sites if encountered, as discussed above. Based on the various studies identified above, no cemeteries or known burial sites will be affected by the Project. However, the City does recognize the likelihood of encountering native Hawaiian burials in certain areas of the Project. As discussed above, pre-construction AISs for each construction phase will allow the Project to identify native Hawaiian burials during final design and prior to construction for each construction phase.*

- *Section 4.1 of the Draft EIS, is now Section 4.2 of the Final EIS. This section describes the existing land uses, including farmlands, development trends, and long-term plans for the study corridor. It also evaluates the Project's consistency with the long-term plans for the study corridor. Your concern regarding the identification of native Hawaiian burial sites is addressed in Section 4.16.2 of the Final EIS, which identifies three general categories of archaeological resources that could be affected: burials, pre-contact archaeology, and post-contact archaeology. These resources are shown by area and rated by probability of occurrence in Figure 4-73 of the Final EIS.*

- *Section 4.3 of the Draft EIS is now Section 4.4 of the Final EIS. This section documents the effects on properties from necessary right-of-way acquisition for the Project. Your suggestion that this section should "discuss whether the City plans to displace and relocate existing burial sites and give details about the timing, location and process related to each of these relocations and displacements" is unrelated to property acquisition described in Section 4.4. However, the following language was added to 4.16.1 of the final EIS:*

  "The City will develop an archaeological inventory survey (AIS) plan for the APE for each construction phase in accordance with 36 CFR 800.4, which allows for phased identification of archaeological resources to limit disturbance of potential resources during the investigation. The City will use PE plans to focus the investigation in locations where there is the potential to affect archaeological resources by project construction. The AIS plans will follow the requirements of HAR Chapter 13-276. The City will conduct the archaeological fieldwork as presented in the AIS plan for each construction phase. The archaeological fieldwork will be completed in advance of the completion of final design so that measures to avoid and/or minimize adverse effects to the historic properties can be incorporated into the design. ***The O'ahu Island Burial Council will have jurisdiction to determine the treatment of previously identified Native Hawaiian burial sites in accordance with HAR Chapter 13-300. Any 'iwi kupuna (Native Hawaiian burials) discovered during the AIS shall be treated as previously identified burial sites.****"*

  (Emphasis added.) Under HRS § 6E-43(b), the OIBC has jurisdiction to "determine whether preservation in place or relocation of previously identified native Hawaiian burial sites is warranted[.]"

- *Section 4.6 of the Draft EIS is now Section 4.7 of the Final EIS. While the City is sensitive to the issues related to native Hawaiian burials, it is not an issue of*

environmental injustice. Hawaii's burial laws and federal historic preservation laws (for burials that qualify for the National Register of Historic Places) allow development in areas where native Hawaiian burials are located subject to the procedural requirements of those state and federal regulations. As discussed above and in the Final EIS, the City has made a good faith effort to avoid, minimize, and mitigate impacts to areas where native Hawaii burials may be present throughout the EIS preparation process and will continue to avoid, minimize, and mitigate impacts during final design.

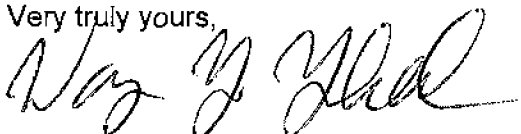
- *In your last bullet-point, you state "Section 4.17 should be revised in the same manner sections 4.1, 4.3 and 4.6 should be." The Draft EIS did not have a Section 4.17, but we assume you mean Section 4.15 of the Draft EIS, entitled, Archaeological, Cultural, and Historic Resources. Section 4.15 of the Draft EIS is now Section 4.16 of the Final EIS. Since you have not specified your concerns regarding Section 4.16, here are some of the general changes we made to that section based on comments and continued consultation:*

  The Area of Potential Effects (APE) was reevaluated following publication of the Draft EIS as a result of ongoing Section 106 consultation. The Historic Effects Report (RTD 2009d) was completed, and the FTA accepted the effect determination recommended by SHPO. The effect determinations of the 81 historic resources are presented; the discussion of Section 106 consultation has been updated; and mitigation was added in accordance with the signed PA. In addition, this section included additional discussion on Act 50, which requires a HRS Chapter 343 EIS to "include the disclosure of the effects of a proposed action on the cultural practices of the community and State." This section also included consideration of the Hawai'i Supreme Court decision in Ka Pa'akai, which you cited in your letter, wherein the Court held that native Hawaiian rights are a subset of culture protected by Act 50. Cultural resource assessment and findings are based in part on the Cultural Resources Technical Report (RTD 2008p).

The extensive and ongoing advance consultation with native Hawaiian individuals, groups, and agencies is in keeping with the letter and spirit of the NHPA and Section 106. As you know, a standing sub-committee of the OIBC has been established with consultation ongoing monthly. In addition, as discussed above, AIS investigations have begun. The AIS program is ongoing and will be taken into account in final plans prior to construction.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,



WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
Creation Date :	12/6/2008
Creator Affiliation :	
First Name :	Stanley
Last Name :	Nelson
Business/Organization :	
Address :	66-080 Waialua Beach Road
Alternative Preference :	
Apt./Suite No. :	
City :	Haleiwa
State :	HI
Zip Code :	96712
Email :	northshorebill@hawaiiantel.net
Telephone :	
Telephone Extension :	
Add to Mailing List :	Both
Submission Method :	Website
Other Submission Method :	
Submission Date :	12/06/2008
Submission Content/Notes :	I believe that construction of the project should start in Honolulu and be built towards the far end terminus. This will permit immediate use by commuters as segments are completed. I believe the Kapolei-Waipahu segment which be largely unused until the system is built out to Honolulu. If the base yard is absolutely critical, then construction should start at both ends and connect at some point. I also support the airport route instead of going through Salt Lake. And the closer the route comes to Pearl Harbor and Hickam, the better. There are too many workers in the Pearl Harbor/Hickam complex to be ignored. And the airport and surrounding industrial area are also major employers. Finally, if there is any way whatever, the link to UH should be included in the initial phase. We all are familiar with the signficant reduction of traffic when UH is not in session. And there are a number of private schools in the area that further contributes to our traffic problems.

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-331301

Mr. Stanley Nelson
66-080 Waialua Beach Road
Haleiwa, Hawaii 96712

Dear Mr. Nelson:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall indentify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

As described in Section 2.5.10, Project Phasing, and further in Section 8.6.9, Construction Phasing, in the Final EIS, to support phased opening, the first construction phase must be connected to a maintenance and storage facility, which requires considerable space. No location has been identified closer to Downtown with sufficient available space to construct a maintenance and storage facility. Therefore, construction will begin between East Kapolei and Leeward Community College. The Project will be constructed in phases to accomplish the following:

- *Match the anticipated schedule for right-of-way acquisition and utility relocations.*

- *Reduce the time that each area will experience traffic and community disturbances.*
- *Allow for multiple construction contracts with smaller contract size to promote more competitive bidding.*
- *Match the rate of construction to what can be maintained with local workforce and available financial resources.*
- *Balance expenditure of funds to minimize borrowing.*

The portion of the corridor in the Ewa direction of Pearl Highlands is less developed than the areas in the Koko Head direction. Right-of-way can be obtained more quickly at the west end of the Project; therefore, overall project construction can begin earlier, resulting in lower total construction costs. Construction is planned to continue uninterrupted in the Koko Head direction from Pearl Highlands to Aloha Stadium, Kalihi, and finally to Ala Moana Center.

As portions of the Project are completed, each will be opened incrementally so that system benefits, even if limited during the initial phases, will be realized prior to completion of construction of the entire Project.

As also discussed in Chapter 2 of the Final EIS, park-and-ride lots are planned at East Kapolei, UH West Oahu, Pearl Highlands, and Aloha Stadium. These stations have been identified as having the highest demand for drive-to-transit access.

Your preference for the Airport Alternative has been noted. While each of the alternatives discussed in the Draft EIS includes trade-offs between benefits and impacts, the Airport Alternative from East Kapolei to Ala Moana has been identified as the Preferred Alternative as described above. As compared to the other alternatives discussed in the Draft EIS, the Airport Alternative will carry the most passengers, provide the greatest transit-user benefits, and result in the fewest vehicle hours of delay. It will provide access to employment centers at Pearl Harbor Naval Base and Honolulu International Airport and will serve the Salt Lake neighborhood with connecting bus service. Of the three Build Alternatives addressed in the Draft EIS, the Airport Alternative will have slightly lower impacts to the natural and built environment. During the public comment period on the Draft EIS, the public overwhelmingly supported the Airport Alternative. Of the comments that specifically supported one of the alternatives, more than 75 percent were in support of the Airport Alternative.

The Alternatives Analysis phase, which preceded the EIS process, is documented in Chapter 2 of the Final EIS. It evaluated a range of modal and general alignment alternatives, in terms of their costs, benefits, and impacts. The scoping process for the Alternatives Analysis involved a presentation of the viable alternatives to the public and interested public agencies and officials to receive comments on the Purpose and Need, alternatives, and scope of the analysis. Scoping for the EIS followed the FTA process that provides for a culling of alternatives studied in the EIS through an Alternatives Analysis. The scoping process initiated for the Alternatives Analysis included a variety of highway, bus and fixed guideway options for consideration. During the later scoping effort for the EIS, the public was requested to propose alternatives that would satisfy the purpose and need at less cost or with greater effectiveness,

less environmental or community impact and to propose alternatives that were not previously studied and eliminated for good cause. The only alternative that emerged that met these criteria was a fixed-guideway alternative following several alternative alignments. All reasonable alternatives that emerged from these processes were ultimately evaluated in the Draft and Final EISs.

Since publication of the Draft EIS, design has been advanced, further analysis has been completed, and information has been added in response to comments on the Draft EIS and agency coordination. The Final EIS discusses the process that was used to select the Preferred Alternative, how comments were considered in the decision-making process, impacts, and mitigation commitments.

At this time, expected funding is not sufficient to complete the extension to UH Manoa. The Project has logical termini at East Kapolei and Ala Moana Center and independent utility from any extensions that may be constructed in the future. The proposed future extensions to West Kapolei, Salt Lake Boulevard, Waikiki, and UH Manoa are discussed in the cumulative impacts sections of Chapters 3 and 4 of this Final EIS. However, the future extensions are not part of this Project, thus they are not required to be evaluated under Chapter 343 of the Hawaii Revised Statutes and the NEPA. Under NEPA, environmental analysis is only required when there is a proposed action by a Federal agency. Here, because the future extensions are not proposed for implementation at this time, they are not part of the Project studied in this Final EIS. It would be premature to undertake an environmental analysis of the extensions (beyond the cumulative impacts analysis) because they are not part of the proposed action to be taken by the City and FTA. If the future extensions are proposed for implementation in the future, environmental analysis of the extensions and appropriate alternatives will be undertaken at that time. Bus service between Ala Moana Center and Waikiki and UH Manoa will be enhanced until those extensions are built.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Action Pending
Creation Date :	11/3/2008
Creator Affiliation :	
First Name :	wolfgang
Last Name :	neumann
Business/Organization :	stop the rail now!!!!
Address :	3222 melemele pl
Apt./Suite No. :	
City :	honolulu
State :	HI
Zip Code :	96822
Email :	wolfneuman@hotmail.com
Telephone :	
Telephone Extension :	
Add to Mailing List :	Both
Submission Method :	Website
Other Submission Method :	
Submission Date :	11/03/2008
Submission Content/Notes :	no.no.no, for rail steel to steel 4-5 billion $$$$, operate in 10 years. it sucks. vote no! vote for bimodal 1.5 billion $$$ operate in 3 -4 years. we need a change for government spending. regards wolfgang neumann

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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Phone: (808) 768-8305 • Fax: (808) 768-4730 • Internet: www.honolulu.gov

MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010 RT8/09-330346

Mr. Wolfgang Neumann
3222 Melemele Place
Honolulu, Hawaii 96822

Dear Mr. Neumann:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraph addresses your comments regarding the above-referenced submittal:

Your comment has been noted. While each of the alternatives discussed in the Draft EIS includes trade-offs between benefits and impacts, the Airport Alternative from East Kapolei to Ala Moana has been selected as the Preferred Alternative as described above. As compared to the alternatives discussed in the Draft EIS, the Airport Alternative will carry the most passengers, provide the greatest transit-user benefits, and result in the fewest vehicle hours of delay. It will provide access to employment centers at Pearl Harbor Naval Base and Honolulu International Airport and will serve the Salt Lake neighborhood with connecting bus service. Of the three Build Alternatives addressed in the Draft EIS, the Airport Alternative will have slightly less impacts to the natural and built environment analyzed in the Draft EIS. During the public comment period on the Draft EIS, the public overwhelmingly supported the Airport Alternative. Of the comments that specifically supported one of the alternatives, more than 75 percent were in support of the Airport Alternative. For more information this selection is discussed in Section

2.4 of the Final EIS. Since publication of the Draft EIS, design has been advanced, further analysis has been completed, and information has been added in response to comments on the Draft EIS and agency coordination. The Final EIS discusses the process that was used to select the Preferred Alternative, how comments were considered in the decision-making process, impacts and mitigation commitments.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
Creation Date :	1/2/2009
Creator Affiliation :	
First Name :	Rachel
Last Name :	Neville
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Alternative Preference :	
Apt./Suite No. :	
City :	Pearl City
State :	HI
Zip Code :	96782
Email :	meville@hawaii.edu
Telephone :	292-6691
Telephone Extension :	
Add to Mailing List :	Email
Submission Method :	Website
Other Submission Method :	
Submission Date :	01/02/2009

Submission Content/Notes : The O'ahu Invasive Species Committee is concerned that the massive amount of construction equipment and materials that will be imported to the island may harbor species that do not currently occur on O'ahu and may become invasive. Dirty construction equipment is a known pathway for plant, animal and invertebrate invasive species. However, there is an easy way that the City and County of Honolulu can protect the island from these threats. The City can include in the Request for Bids specifications, a requirement that the winning bidder ensure any construction equipment or material imported to O'ahu from the mainland, neighbor islands or foreign countries be free of dirt, vegetative matter, insects and animals.

There are precedents for this action. The Hawai'i Department of Transportation has included such specifications in the Request for Bids for North-South Road. Australia and New Zealand, two policy leaders in invasive species prevention, require any equipment imported into their country be free of dirt and vegetative matter. Dirty equipment is sent back to its country of origin at the shipper's expense.

By requiring the chosen construction company to ensure that equipment and materials are clean, the City and County of Honolulu will save money in control efforts later.

Invasive species on construction equipment is a real threat. Seeds, vegetative matter, insects, and even small animals could be accidentally transported to O'ahu on large vehicles and harm our watersheds, local agriculture, environment and way of life. Invasive species such es pampas grass and Red Imported Fire Ant cost mainland taxpayers millions of dollars each year in control efforts. Requiring the companies constructing the light rail system to clean their equipment before they bring it to O'ahu will be a progressive and cost-effective step towards protecting our island from invasive species.

The O'ahu Invasive Species Committee would be happy to assist in any way the crafting of language to insert a clean-vehicle specification into the Request for Bids. Please call me at 292-6691 or email at rneville@hawaii.edu, should you have any questions about this comment. I have also mailed a hard copy to the Department of Transportation Services.

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-332357

Ms. Rachel Neville
Oahu Invasive Species Committee
2551 Waimano Home Road
Pearl City, Hawaii 96782

Dear Ms. Neville:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraph addresses your comments regarding the above-referenced submittal:

The introduction of invasive species to Oahu is a concern and has been addressed in the Final EIS. The Hawaii Department of Transportation (HDOT) developed construction specifications for Invasive Species Management Section 665 for North-South Road. Once adopted by HDOT as a standard specification, the Project will comply with it. Criteria for cleaning, inspecting, and treating plants that are at risk of harboring pests will be part of the landscaping requirements for the Project. Species that can be harmful invaders or contribute to existing problems will not be used for project plantings. Construction specifications will state that construction equipment from other parts of the island or other counties will have to be washed before being brought to the project site.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

RT 12/08-292995

Honolulu High-Capacity Transit Corridor Project

Welcome to the Honolulu High-Capacity Transit Corridor Project's Public Hearing for the Draft Environmental Impact Statement/Section 4(f) Evaluation.

This public meeting and hearing has been designed to inform the public about the transit project, explain materials contained in the Draft EIS, answer questions from the public, and collect public input on project issues related to the Draft EIS, Section 106 of the National Historic Preservation Act, Section 4(f) of the U.S. Department of Transportation Act, and floodplains affected by the project.

Please review the project information and ask project staff any questions about the project that you might have. The Draft EIS is available on the project website at www.honolulutransit.org.

You may provide official comments in several ways. Here at this Public Hearing you may provide oral comments to a court reporter who will record them for the record or use this form to provide written comments. After the meeting, you may provide an on-line comment at www.honolulutransit.org or use this form to send a written comment to the Department of Transportation Services. All comments must be postmarked or received by January 7, 2009 in order for them to be included in the Final EIS.

Name: C. Newman

Address: 860 Halekauwila #1005 Honolulu Hi 96813

Phone: 597-1140

E-mail:

Comment(s): I personally have been opposed to the rail system as planned. I feel it detracts from our Islands natural beauty blocking mountain + ocean views. Perhaps it could utilize our original rail system in the ground of which we have tracks still remaining in some areas plus a train depot still standing right downtown. Then I discovered the system planned to go down the middle of my narrow Street right in the front of my apartment residence. I am already awaken by our city garbage pickups 4:00 AM plus in the morning with their trucks whizzing their backup beeping which I don't understand as there is no other traffic to signal at that hour. Why pray tell was Halekauwila St. chosen to go from downtown Honolulu to Kona St. at the Ala Moana Mall — wouldn't it make more sense + more scenic to go down a wide street as Ala Moana Blvd where it could go down the center of the street not disrupting any residences or businesses, etc or even on the makai

(over)

side of the street with decorating or many businesses make as well as providing the pedestrian a more scenic ride. (Review environment to include in the future.)

Also I'd like to point out the cost projected is not predicted in the present day or the accelerating future. Plus more as cost that transit can be considered as security, so much more.

I pray you will consider these recommendations in future planning.

Mahalo for hearing my concerns,

C/James

FOLD

Return Address

Place Postage Here

Department of Transportation Services
Attn: Honolulu High-Capacity Transit Corridor Project
City and County of Honolulu
650 South King Street, 3rd Floor
Honolulu, HI, 96813

DTS RAPID TRANSIT
'08 DEC 26 P2:07

STAPLE HERE

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, 3RD FLOOR
HONOLULU, HAWAII 96813
Phone: (808) 768-8305 • Fax: (808) 768-4730 • Internet: www.honolulu.gov

MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT12/08-292995R

C. Newman
860 Halekauwila Street, #1005
Honolulu, Hawaii 96813

Dear C. Newman:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

Your preference for the No Build Alternative has been noted. The No Build Alternative does not address the Project's needs or meet its purpose as established in Sections 1.7 and 1.8 of the EIS. While each of the alternatives discussed in the Draft EIS includes trade-offs between benefits and impacts, the Airport Alternative from East Kapolei to Ala Moana has been selected as the Preferred Alternative as described above. As compared to the alternatives discussed in the Draft EIS, the Airport Alternative will carry the most passengers, provide the greatest transit-user benefits, and result in the fewest vehicle hours of delay. It will provide access to employment centers at Pearl Harbor Naval Base and Honolulu International Airport and will serve the Salt Lake neighborhood with connecting bus service. Of the three Build Alternatives addressed in the Draft EIS, the Airport Alternative will have slightly less impacts to the natural and built environment analyzed in the Draft EIS. During the public comment period on the Draft

EIS, the public overwhelmingly supported the Airport Alternative. Of the comments that specifically supported one of the alternatives, more than 75 percent were in support of the Airport Alternative. For more information this selection is discussed in Section 2.4 of the Final EIS. Since publication of the Draft EIS, design has been advanced, further analysis has been completed, and information has been added in response to comments on the Draft EIS and agency coordination. The Final EIS discusses the process that was used to select the Preferred Alternative, how comments were considered in the decision-making process, impacts and mitigation commitments.

The island's unique visual character and scenic beauty were considered in the visual and aesthetic analysis presented in the Draft and Final EISs. As discussed in Section 4.8 of the Final EIS, the Project will be set in an urban context where visual change is expected and differences in scales of structures are typical. The following measures will be included with the Project to minimize negative visual effects and enhance the visual and aesthetic opportunities that it creates:

- *Develop and apply design guidelines that will establish a consistent design framework for the Project with consideration of local context.*
- *Coordinate the project design with the City's transit-oriented development program within the Department of Planning and Permitting.*
- *Consult with the communities surrounding each station for input on station design elements.*
- *Consider specific sites for landscaping and trees during Final Design when plans for new plantings will be prepared by a landscape architect.*

DTS will consult with the communities surrounding each station for input on station design elements. The Project will provide users, including tourists, with expansive views from several portions of the corridor by elevating riders above highway traffic, street trees, and low structures adjacent to the alignment. In Section 4.8.3 of the Final EIS, specific environmental, architectural, and landscape design criteria are listed that will help minimize visual effects of the Project. The Project will also provide residents and tourists with more transportation options.

As described in Chapter 2 of the Final EIS, several alignments were evaluated during the Alternatives Analysis process. One evaluated alignment was the historic OR&L line. A combination of issues, including utilities that have been placed in the right-of-way, poor location in several places, and the previous loss of the right-of-way in several locations, all contributed to the elimination of that option. During the analysis, several streets were evaluated for either elevated or underground alignment and determined to be inferior to Halekauwila Street. An elevated system on either Beretania or King Streets would run in front of either the State Capitol or Iolani Palace and would require removal of traffic lanes. Queen Street is narrower than Halekauwila Street and adjacent to numerous historic resources.

Noise effects from the Project are detailed in Section 4.10 of the Final EIS. The Project will not cause any severe noise impacts. Three receptors will experience moderate impacts that

will occur on the fifth through ninth floors of several buildings. The Project includes several features to reduce noise from the system, including an integrated noise-blocking parapet wall at the edge of the guideway structure that extends three feet above the top of the rail and a system specification for vehicles with wheel skirts. Wheel skirts on trains will also increase the benefit of the parapet wall at locations above the elevation of the track. The use of sound-absorptive materials under the tracks in these three areas will reduce the project noise exposure at upper floors to below the moderate noise impact threshold. With mitigation, the Project will not generate any noise impacts. Although it may be possible to hear the train, the noise it makes will be at a level that is close to what is currently experienced.

Regarding financial concerns, Chapter 6 of the Final EIS describes the financial resources anticipated to be needed to pay for the capital costs of the Project and for ongoing operating and maintenance costs. Capital costs of the Project, including finance charges, are expected to be fully paid for by a combination of FTA Section 5309 New Starts Funds from the Federal government and the General Excise and Use Tax surcharge revenues collected from 2007 through 2022 on Oahu. Operating and maintenance costs will be paid for from the same sources currently used for TheBus: Federal funding, fare revenues, and City revenues from the General and Highway Funds. Security costs are reflected in the operating and maintenance costs shown in the Final EIS.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
Creation Date :	12/6/2008
Creator Affiliation :	
First Name :	karen
Last Name :	nishimura
Business/Organization :	retired
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Zip Code :	96701
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Telephone :	
Telephone Extension :	
Add to Mailing List :	Email
Submission Method :	Website
Other Submission Method :	
Submission Date :	12/06/2008
Submission Content/Notes :	I agree with what Dijou has suggested in the Honolulu Advertiser 12/5/08. If the rail project will be done in segments, starting in Pearl City with parking for the people living beyond the H1/H2 merge makes sense. The people living beyond the H1/H2 merge will be able to park in Pearl City and catch the rail to their destination. Also, the idea of having bicycles to rent or stalls for privately owned bicycles aounds feasible.

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, 3RD FLOOR
HONOLULU, HAWAII 96813
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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-331293

Ms. Karen Nishimura
98-1691 Apala Loop
Aiea, Hawaii 96701

Dear Ms. Nishimura:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall indentify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

While each of the alternatives discussed in the Draft EIS includes trade-offs between benefits and impacts, the Airport Alternative from East Kapolei to Ala Moana has been identified as the Preferred Alternative as described above. As compared to the other alternatives discussed in the Draft EIS, the Airport Alternative will carry the most passengers, provide the greatest transit-user benefits, and result in the fewest vehicle hours of delay. It will provide access to employment centers at Pearl Harbor Naval Base and Honolulu International Airport and will serve the Salt Lake neighborhood with connecting bus service. Of the three Build Alternatives addressed in the Draft EIS, the Airport Alternative will have slightly lower impacts to the natural and built environment. During the public comment period on the Draft EIS, the public overwhelmingly supported the Airport Alternative. Of the comments that specifically

supported one of the alternatives, more than 75 percent were in support of the Airport Alternative.

The Alternatives Analysis phase, which preceded the EIS process, is documented in Chapter 2 of the Final EIS. It evaluated a range of modal and general alignment alternatives, in terms of their costs, benefits, and impacts. The scoping process for the Alternatives Analysis involved a presentation of the viable alternatives to the public and interested public agencies and officials to receive comments on the Purpose and Need, alternatives, and scope of the analysis. Scoping for the EIS followed the FTA process that provides for a culling of alternatives studied in the EIS through an Alternatives Analysis. The scoping process initiated for the Alternatives Analysis included a variety of highway, bus and fixed guideway options for consideration. During the later scoping effort for the EIS, the public was requested to propose alternatives that would satisfy the purpose and need at less cost or with greater effectiveness, less environmental or community impact and to propose alternatives that were not previously studied and eliminated for good cause. The only alternative that emerged that met these criteria was a fixed-guideway alternative following several alternative alignments. All reasonable alternatives that emerged from these processes were ultimately evaluated in the Draft and Final EISs.

Since publication of the Draft EIS, design has been advanced, further analysis has been completed, and information has been added in response to comments on the Draft EIS and agency coordination. The Final EIS discusses the process that was used to select the Preferred Alternative, how comments were considered in the decision-making process, impacts, and mitigation commitments.

Bicycle racks will be available at each transit rail station, and trains will be designed to accommodate bicycles as regulated by a bicycle policy. Bicycle rental programs are outside the scope of this Project; however, this Project does not preclude such a program.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

February 5, 2009

Glenn J. Oamilda
9-1179 Puamae'ole Street, 24V
'Ewa Beach, Hawai'i 96706
Email: imkanaka2@yahoo.com
Cell: (808) 295-4860

Mr. Wayne Y. Yoshioka, Director
Department of Transportation Services (DTS)
City and County of Honolulu
650 South King Street, 3rd Floor
Honolulu, Hawai'i 96813

Reference: THE DRAFT ENVIRONMENTAL IMPACT STATEMENT (EIS), City of Honolulu's Heavy Rail Transit Project

Aloha, Director Yoshioka,

Thank you for allowing me the opportunity to present my opinions and comments on the heavy, massive rail transit project, perhaps the largest capital public works project the City and County of Honolulu will ever undertake at the expense of the taxpaying public, of which I strongly .... *oppose*!

My name is Glenn Oamilda, born and raised in Waipahu on the O'ahu sugar plantation, now residing in nearby 'Ewa Beach, where for the last twenty-five (25) years I have remained active and continue to be involved in community organizations and activities, political, social and cultural, with greater concerns over development issues and problems that have directly impacted my community and the greater 'Ewa region.

Today, many who reside in the region are angry and frustrated with the everyday hassles of meandering through the myriad of traffic and development problems, issues and impacts, just to get to work and back. Some people remain very cynical that positive changes will come soon; while other feel that more on-going and continuous planning is really needed to insure a well maintained, sustainable and balanced growth throughout the region.

I cannot forget the very first meeting ever held, nearly fifteen (15) years ago, when people in the region came together to-talk-story and plan that brought forth a vision for a second city. After the closing of both 'Ewa and Waipahu sugar plantations, people watched and witnessed as sugar lands were slowly being transformed and developed into a city. Although, along with the many positive changes, came all the negative changes as well.

AR00002707

The Second City of Kapolei: The 'Ewa Development Plan vs. Mass Rail Transit

After many years without much government oversight, the public living in the region have come know how to deal and faced the daily complexities that development brings. They have agreed, instead of groping effortlessly in the dark to find solutions and remedies, the 'Ewa Development Plan a planning guide and a public/government document is the alternative that offers a more realistic and pragmatic approach that addresses and deals with all the present mounting impacts and future and predictable issues, and problems related to development and traffic. They understand the EDP serves with much government and public leadership and oversight that outlines the policies, with and guidance, controls and enforcements over development.

There is no doubt in 2005, when the incoming mayor made a serious pitch for mass transit, it became a top priority on his political agenda. And he aggressively challenged anyone who dare to oppose, or even question his motive on how to solve the leeward traffic congestion problems. After his first term in office, the mayor had shown no desire, no interest in the 'Ewa Development Plan. It was only evident by his unwillingness to engage in a concerted effort to partner with people in the region to find solutions and answers to all the present and future development impacts, issues and problems.

Today mind you, the city have shown no interests or hints of wanting to come together in partnership to seriously discuss present and future plans for the second city. I think the city purposely and intentionally side-stepped the public's EDP review process on all the new proposals and on-going projects. This passive inaction and insensitive display only heightened and further increased public tensions with deepening negative feelings. With on-going daily psychological pressures, financial and physical stresses, residents living in the region cannot continue to remain positive and hopeful their vision and goal will ever come to fruition in the planning and the building of the second city. So why then is government dragging its feet on initiating a meeting, a task force or a conference?

And yet, the mayor and the city response to 'Ewa's woes is a-go-at-it-alone mindset, by proposing an elevated mass transit system. I think this proposed project is simply an illusion. At the initial meeting on the Plan, nearly fifteen years ago, rail was never on the agenda, never an agenda item at subsequent meetings, or a topic of conversation by any committee member, nor even a subject of interest at any public community meetings. In the EDP, only an intra-modal transportation system circulating within the second city of Kapolei is mentioned, with no provision for an elevated mass transit. So, I ask: Why hasn't the mayor expressed any real interest or responded with great concern by partnering with residents on the west side to

find answers and solutions to the regional problems? Or is this train project a political game of follow the money, a quid pro quo, "something-for-something" arrangement with private developers, or corporate affiliates to further his political ambitions?

Planning: Less Cost to Taxpayers

My answer to them, based on my own personal experience and years of observation is to repeat the same concerns the general public has about development and that, its simply utilizing the EDP already in place as the main planning tool.

In my opinion, the Plan will eventually lessen the $6 billion dollars estimated projected cost for rail, leading government to consider other cheaper alternatives, by: 1) Aggressively promoting or persuading business employers to relocate to 'Ewa, or by offering tax incentive and tax credits as inducements; 2) Urging business employers to bring with them workers back to the area, that would greatly reduce the traffic congestion by the amount of car from 'Ewa going to town every morning and returning home every evening; and, 3) Lessening the stresses on the environment, the precious resources and retaining the natural beauty of the island.

However, for the last two and a half years, I attended nearly fifteen (15) City and County of Honolulu sponsored public forums where Parsons/Brinkerhoff, the city's lead contracted planners, made each presentation on the mass transit project, and yet, there was nothing compelling or convincing enough that would sway me to think otherwise that, this proposal would be a benefit to the all communities and the taxpayers as well, that: 1) The city can justify, by its own estimates, the high cost of building the rail of between $3.5 and $6 billion dollars (including property condemnation), and the annual perpetual maintenance cost of $60 million dollars; 2) It will reduce traffic congestion, on the amount of cars traveling east bound every morning and the reverse west bound in the afternoon; and, 3) This massive and heavy elevated rail system is, in many way, environmentally green and earth friendly.

I cannot fully accept the city's decision or motive or its data, nor even feel comfortable and optimistic that rail is the answer and it will work. This is clearly a unilateral, a one-sided approach, based on statistical findings predicated only on assumptions, inferences and suppositions, with no hard guarantees, assurances or other viable transportation alternatives, but to the city rail is the only solution. But the city feels hopeful and confident this proposed heavy and massive rail project will literally get working people out of their automobile, hop on the train in the morning to Honolulu and back to 'Ewa in the afternoon. Frankly, I said before and I am going to repeat it again, this proposed mass transit is one man's illusion to think that rail will get people out of cars.

Let me give an example, in the year 2000, the state with federal dollars initiated the ferry pilot project which ran from 'Ewa Beach to Aloha Tower it offered perks and freebees as inducements to get drivers from the west side out of their cars. But after a year, because of the low public ridership, the ferry project went 'belly up.' Its plain and simple, drivers in Hawai'i are simply captivated by their big gas guzzling sedans and heavy SUV trucks. They don't mind traveling far distances, and won't even blink an eye at the cost of higher gas prices, even car and bus pooling, stretching the freeways, rearranging workers schedules have not worked at all. The city should have learned from this picture by connecting all the dots. By the estimated huge price tag for the proposed massive elevated rail which the city is asking taxpayers to shoulder is simply foolish and irresponsible. Its just throwing hard earned working dollars at a very bad project. In my opinion, rail is just another choice, another alternative offered to the general public, and the likelihood people will choose the automobiles. What would I suggest? Let me start by addressing automobiles going into downtown Honolulu from 'Ewa, that the city considers passing and enforcing an ordinance that would restrict private automobile movement from entering this 'no drive zones,' a mile radius from the civic center. The other idea is to enact a law that controls that sets a ceiling on the amount of automobiles on the island.

The City and County of Honolulu justifies its argument and swears by its presumptive assertion, supported by a Traffic Alternative Analysis study citing data that, by the year 2030 build out, the public will see an eleven percent (11%) to about twenty-three (23%) reduction in traffic that, a rail transit system is needed now, as the only option and the only answer to solving the daily vehicular work traffic congestion problems. I think these are sorry and dismal numbers that taxpayers can be pleased with, and can be convinced their dollars are being spent wisely, money not just thrown against the wall hoping something sticks. If the city stand by these figures, then perhaps, all the decisions-makers and politicians should reside in the 'Ewa area so they can sympathize and empathize with the pain and anguish the residents the go through every morning. People who have lived in the region for years have come to know, come to understand and agree that the most sensible and rational way to deal with the morning and evening traffic congestion problem is to begin the planning process.

Vision is to Plan Now: Don't Wait Until 2030 Build-out

Mr. Yoshioka, lets be real, this is 2009, between now and the next twenty-one (21) years when the city estimates by 2030 the second city of Kapolei will be built-out, what hopeful suggestions can the city make to the people and to the commuting public? Mind you, if there are no suggestions from you or the mayor, then residents and commuters alike can continue crossing their fingers, hoping for the best, and chug-a-long in daily traffic as they normally did, and ignoring on-going

development by just pretending as if nothing is going on. I think waiting twenty-one (21) years by this administration for the second city massive built-out is just a cheap and easy-way-out than to deal with the public's every day problems in the region. It only points out how inept and incompetent government really is. Historically as far back as the early '80s, every community on the 'Ewa plains and along the Wai'anae coast foresaw a massive influx of people with a shift in island population along with huge developments. Indicators and predictors proved to be correct, now we all share the same common development impacts, issues and problems.

When Kapolei was designated the second city by the state of Hawai'i, there were no concerted efforts or suggestions made by past city administrations, or even this one, to all the players in the region to come together in partnership and engage in the planning process with serious and continuous ongoing dialogues, discussions and discourses.

The 'Ewa Beach community, for example, which relies primarily on the Fort Weaver Road corridor, the only main arterial roadway in and out of the area, requested and pressed the city and county for an alternate road, one that was parallel and within the federal limited guidelines, in and out of 'Ewa Beach. But

after years and years of political "foot dragging," and with mauka housing developments moving rapidly makai into 'Ewa Beach, the community unfortunately lost out and is now tucked away, cornered in on the leeward side of O'ahu, locked in makai by the ocean and mauka by land.

Lack of Planning: Communities Question Government's Role

Today, Mr. Yoshioka, as the Honolulu City Council debates the alternate transit alignment from 'Ewa thru the community of Salt Lake by-passing the Honolulu airport to town, as one option; or by-passing Salt Lake thru Honolulu to town as the other option, what alternative can you offer the community of 'Ewa Beach having no more than one-roadway-in and one-roadway-out, yet unlike the Salt Lake community having multiple accessible roadways in and out of the area? However, at the present time, to say the least, discussions continue between the city council and the Salt Lake community representative councilman Romy Cachola. Whatever the outcome, its just an awesome display of caring and concern by an elected public official in representing his constituents. In contrast, I can say with great certainty, that 'Ewa Beach for many years, never had good, solid and decisive elected representation; and in fact, I think the area councilman, Todd Apo, has already hopped on the train with the mayor.

Furthermore, I can also attest that on the initial rail proposal, the city and area elected officials never met with members of the 'Ewa Beach community; nor was the

public given the opportunity to openly discuss and dialogue the elevated rail transit, the alignment, or the choices of alternate rail technologies. Regretfully, as of today, the community is still without an alternate route out of the area, 'Ewa Beach commuters must continue to deal unbearably with twelve (12) traffic lights, daily road work and home construction; for residents who waste time sitting in traffic and drivers who must drive daily, the five (5) miles distance just to get to H-1, doing the math calculation is a no brainer .... its *total insanity!*

In the late '80s, when the State of Hawai'i designated Kapolei as the Second City, it only meant that the downtown Honolulu business district and its surrounding populated areas were showing signs of bursting at the seams, of being over crowded.

The political and social strategies was to relocate business employers to the second city bringing workers along by offering them businesses tax incentives and tax credits; and at the same time, attracting housing developers who would design and build well-planned communities. Newly relocated workers would move in these planned communities, commuting workers would return to the region to work and together they all can live, work and play in the area, thereby spending more time strengthening family relationships, community ties and enhancing the *life-style* values from Hawai'i's unique cultures and traditions.

When the housing developers arrived, in the mid-to late '90s, they were noticeable by the staggering numbers of permit requests for land zoning, rezoning, walvers, amendments and agreements. The high numbers of permit approvals for housing developments, easily out paced government's ability, not only to provide guidance and leadership toward a *balanced* and *sustainable* growth, but also lacked the power to control and mitigate the predictable mounting impacts caused by the uncontrollable and rampant developments on the 'Ewa plains. Moreover, with development came more housing construction, but businesses never kept pace with development and the growing working population, and as a result, many area workers had to travel back and forth to town. With the lack of oversight and aggressive control over housing construction and traffic congestion, some people have grown more leery, angry, apathetic and the lost of trust and confidence in government and elected politicians; while others have deepening resentment that the city had simply yielded its authority and acceded power to the developers.

Residents also, strongly believe that construction of only houses creates bedroom communities. It minimizes the *qualities-of-life* and diminishes *life-styles*; hearing developers talk of making huge profits, meeting deadlines, rushing to build-out and building more homes because of buyer-markets, have been seen by the general public as being too greedy! These sorts of thinking and behavior has only lessened the chances and prospects of ever obtaining a well *balanced* and *sustainable* growth

in the region. In addition, the city's Department of Planning and Permitting (DPP) has projected that there will be about forty thousand (40,000) new homes built on the 'Ewa plains. This estimate does not include those houses already permit approved, shovel ready and on-going housing projects. This projected data points out that without proper and serious planning, one can only visualize that by the 2030 build-out the second city of Kapolei will look like a massive, sprawling bedroom metropolis.

Moreover, public protest and anguish over too much cars!, too much traffic lights!, too much housing construction!, no alternate roads out!, no infrastructure!, of over building, of over development, of traffic impacts, of the lost of a life-style and the quality-of-life continues until this very day. It has intensified to a point that for many residents living in 'Ewa has become so unbearable .... *mentally, physically and financially!*

In addition, public dissent and dissatisfaction has manifested itself in other area of the island as well. Community leaders and residents living in the Central O'ahu area from Waipio Gentry, Mililani, Wahiawa, and others communities mauka, are skeptical that short term traffic solutions can be found. They have made it also clear at many community gatherings and meetings, that increased traffic congestion from the west side will make it even tougher for them to get to town every morning and back home every evening.

The Honolulu city council, in late 1997, adopted the 'Ewa Development Plan. Through a *visioning team* consisting of community members and leaders from local boards, activities, organizations and in partnership with the city's planning department came together to address all future developments on the 'Ewa plains.

After months and years of public discourses, dialogues and discussions, the team set in place a regional plan, a public/government document, consistent with a vision, concepts and policies, principles and goals with realistic guidelines for a *balanced and sustainable growth.*

Clearly, the EDP underscores two (2) important points: 1) In provision 5.1.2 that says .... "the city must take an active role in the planning and coordinating construction of needed infrastructure .... And the development of the regional transportation system ....," and, 2) In provision 2.2.10 .... "as a condition for zoning approval to insure that development does not outpace infrastructure development .... "

The 'Ewa Development Plan: Review, Reassess and Revise

The 'Ewa Development Plan, however, is ten (10) years late and over due for

public review. It missed the first and second five (5) year review cycles. As of November, 2008, after ten years of added proposed and on-going projects in the region, the public will finally get to review, reassess and make the necessary changes to the draft EDP proposal.

Yea but, the questions I have lingering in my mind are: What will happen to all those construction projects from the last ten (10) years that have been included and approved by the Department of Planning and Permitting (DPP) that have already been built, in the paper mill or shovel ready? Furthermore, does the public get to decide what projects stay and what projects go? And is the city willing to partner with the players the region in reviewing and assessing the draft EDP? And as a follow-up, is the city willing to engage the public in continuous discussions, dialogues and discourses on solutions to the present traffic and development issues, problems and impacts? And is the city willing to be involved in present, on-going and continuous future planning?

Everyone should be reminder that the 'Ewa Development Plan came to life as the result of government partnering with the public. To repeat again, the EDP is a government / public document that outlines the principles, policies and goals and serves as a planning guide to on-going and future developments in the region that would help mitigate most, if not all, of the present and future impacts and issues.

I remembered very clearly, when the city presented to the public for the first time its conceptual layout of the mass transit project at Kapolei Hale. On fielding questions from the audience, I asked the mayor a question of which I thought was very simple and very direct: Mr. mayor with the high cost of the proposed rail transit couldn't the money be redirected and wisely spent in the 'Ewa region for the purposes of mitigating some of the impacts, like building new and repairing roads, repairing and upgrading sewer plant and transmission lines throughout the entire 'Ewa region?

He retorted with sarcasm, saying, "Glenn, your thinking is in the minority!" He quickly turned to all his department heads, city aides and workers who were standing in front of the glossy colored layouts sitting on top about a dozen and a half easels depicting the mass rail transit route alignment, and asked them: "Does anyone agree with Glenn?" He got an instant response. In unison, they all clapped and with a big roar said, "No!" At that point I knew that this transit project was a *'done deal,'* leaving no doubt in my mind that this project was going to be his *baby* .... his *legacy!*

Mr. Yoshioka, by those responses nearly three years ago, the mayor was adamant and unmoved that the proposed rail transit project, which would move people daily

to Honolulu to work and home, costing taxpayers billions of dollars, is the only solution to 'Ewa's problems. People don't think the mayor fully understands the severity of just how the daily issues and problems related development have greatly impacted their lives. They can relate stories and experiences on how they have coped daily with all the financial and psychological stresses and traumas brought about by all the impacts.

They sense the city is narrowly focused on rail only and nothing else. They have seen no signs or a willingness to partner in a parallel planning process that addresses the issues and impacts now, and not wait until 2030. Its blows my mind just to think that the city and county with all the available resources at its disposal cannot approach or engage the communities in problem solving. Yet today, the city continues to move forth with plans for the massive rail project, leaving area commuters and residents with an apathetic and insecure feeling that the city is incapable of "chewing gum and walking at the same time."

Finally, let me leave with these suggestions: 1) That the city in partnership with all the players in 'Ewa region engage in a parallel planning process - continue to plan the rail project, and in tandem; continue to address and find solutions to the traffic congestion and infrastructure problems; 2) That we enforce the provisions of the 'Ewa Development Plan by maintaining a presence in the 'Ewa region exerting strong leadership and guidance and control coordination over development activities; 3) That we utilize the EDP as the guide to a sustainable and balanced growth; 4) Entertain plans for Kapolei to become a "real" city with a government structure in place; 5) That we recreate financial strategies to attract and draw more business employers to the region, i.e., offers of tax incentives, tax credits, etc.; and, 6) Take more social and sensitive approaches to Hawai'i's *'life-style'* - the inherent cultural and traditional values - with a clear-cut mandate to insure and preserve the *quality-of-life* for every citizen.

The Environment Vs. Rail: Concrete in the Sky

In Hawai'i the environment is really dear to everyone who live here. Residents respect and revere nature in every form. Visitors alike appreciate the natural scenic views and pristine beauty of the island. This proposed rail system will destroy the view and beauty of the 'Ewa area. The city's own Alternative Analysis study indicates there will be cement columns and piers, rising like towers in the sky, built and constructed to support concrete platform bays. There will be nineteen (19) of them each with a maximum heights of eighty (80)feet (comparable to a six or seven story building), and a minimum of thirty (30) feet (similar to a two story building), running twenty-three miles, starting at the eastern end of the 'Ewa plains and terminating at the University of Hawai'i in east Honolulu. The reference and description made by many people that, this proposed heavy, elevated and massive

rail transit as being just "concrete in the sky." I concur with them as a true assessment of the project, the city is insensitive and out of touch with the rest of the O'ahu's population. I'd like to remind the city, make no exceptions, we are all stewards of the environment - from the mountain to the sea - over, under and above the land and over, under and above the ocean. The mayor thinks his rail project is 'environmentally friendly,' but I beg to differ with him. Government should be in the forefront, leading the public on mitigating environment issues, but this city administration chooses to trade-off hawai'i's fragile environment for an elevated rail system. Is it humanly possible to simply throw hard earned taxpayers' money at this proposed rail transit and ignore the cognizant consequences to the environment?

Noise pollution is another issue that the proposed heavy rail regarding will have on the environment. The city's Traffic Alternative Analysis study indicates that high pitched screeching sound emitted from the train's metal-on-metal, steel wheels, running on steel rails would be no louder than the noise of a car's rubber on concrete or asphalt traveling at the maximum freeway speed. This assumption remains to be validated, but all is known that noise is definitely pollution.

Lastly, the city is throwing everything it has in its arsenal in hopes this proposed massive, elevated rail transit system will be successful despite the low state and federal revenue projections. To me its a bad proposition to just throw hard earned tax dollars at a bad project, with hopes of getting the greatest bang out of taxpayers money. The present economic down turn, which is reflected not only on the national level, also felt here in Hawai'i is completely irresponsible and heartless for the Hannemann administration to ask the taxpayers to fund this project. The cost to all O'ahu taxpayers to fund, condemn property (displace people) and maintain, in perpetuity, the heavy and massive rail system is a big request for taxpayers to shoulder, plus the tremendous environmental, psychological and economic accompanying risks. Mahalo 'io 'oe!

With sensible and rational planning,

Glenn Okimoto

AR00002716

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT2/09-299174R

Mr. Glenn J. Oamilda
9-1179 Puamaeole Street, 24V
Ewa Beach, Hawaii 96706

Dear Mr. Oamilda:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

Your comments and opinions have been noted. Comprehensive land use planning in the Ewa Development Plan area was considered during development of the Project, and the Project will support the objectives and goals of the Ewa Development Plan, as noted in Section 4.2 of the Final EIS. However, the issues of promoting private development and providing incentives for businesses are beyond the scope of this EIS.

The Project was approved by the City Council in 2006. The cost of the Project is defined by the type of construction, which is justified by the high quality of service to be offered. This decision was made in light of the substantially higher performance of the fixed guideway compared to all the alternatives that have been studied since the Alternatives Analysis was

begun in 2005 and including previous efforts to improve transportation in the corridor. This information is discussed in Chapters 2 and 6 of the Final EIS.

Regarding traffic congestion, Section 3.4.1 of the Final EIS identified changes in congestion between the Project and the No Build Alternative. With the fixed guideway system, total islandwide congestion (as measured by vehicle hours of delay) will decrease by 18 percent compared to the No Build Alternative (as shown in Table 3-14 in the Final EIS). In addition, traffic volumes were studied at various screenlines in the study corridor. The travel demand forecasting model was used to forecast traffic volumes at these screenlines in 2030, both with and without the Project. Analysis revealed that traffic volumes at these screenlines will decrease up to 11 percent with the Project (as shown in Tables 3-9 and 3-10 in the Final EIS). In addition, as detailed in Chapter 4 the Final EIS, the Project will result in a decrease in energy consumption and air and water pollution compared to the No Build Alternative.

The Project is intended to increase transportation options, not to restrict people's freedom of movement. Your suggestion has been noted.

One of the needs for the Project is to support the development of Kapolei as the "second city." The East Kapolei termini will support transportation to this community prior to 2030. Coordination has been ongoing with the City of Kapolei to meet its planning goals. The EIS process is independent of the electoral process or results.

The Project Team has met with area representatives from the Ewa Beach area and has had several meetings with residents of the community. In addition, information booths were provided at several community events within or close by the Ewa Beach area. Participants at these meetings had the opportunity to speak with project representatives and also provide their comments. The last public meeting held at Holomua Elementary School on October 14, 2008, was attended by the letter writer. Members of the project consultant staff, as well as DTS representatives, were available at this meeting. Other City projects are expected to assist in alleviating current traffic problems in the Ewa Beach area. The benefits of this Project, in addition to other planned projects, should help lessen traffic congestion currently experienced by Ewa Beach residents. This comment addresses concerns with the Ewa Development Plan, which is a separate City planning process.

The Project was developed through the OahuMPO's islandwide planning process. This planning is integrated with all other islandwide transportation planning on Oahu and will contribute to the long-term mobility of residents of the Ewa area. The City is working with various land owners in Ewa to integrate their planned developments. As stated in Section 4.2 of the Final EIS, the Project will be consistent with adopted State and Local government transportation land use plans and policies (these include Ewa, Central Oahu, and the Primary Urban Center development plans). Section 1.8.3 of the Final EIS discusses the planned growth envisioned by the Ewa Development Plan. Your comment to create financial strategies to attract more business employers to the region is noted, but these financial strategies are beyond the scope of the Project. Your other comments have been noted.

The DTS and FTA have planned the Project very carefully to ensure that social and cultural issues are accounted for and avoided and/or protected, where possible. The Final EIS

evaluates the Project, which is defined as extending from East Kapolei to Ala Moana Center. The Project has logical termini and independent utility from any extensions that may be constructed in the future. The future extensions to East Kapolei, Salt Lake Boulevard, Waikiki, and UH Manoa are discussed in the cumulative impacts sections of Chapters 3 and 4 of the Final EIS. The future extensions are not part of the Project; thus, they are not required to be evaluated under Chapter 343 of the Hawaii Revised Statutes and NEPA. Under NEPA, environmental analysis is only required when there is a proposed action by a Federal agency. Here, because the future extensions are not proposed for implementation at this time, they are not part of the Project studied in the Final EIS. It would be premature to undertake an environmental analysis of the extensions (beyond the cumulative impacts analysis) because they are not part of the proposed action to be taken by the City and FTA. If the future extensions are proposed for implementation in the future, environmental analysis of the extensions and appropriate alternatives will be undertaken at that time. Visual effects related to the UH Manoa planned extension are discussed in the Visual and Aesthetic Resources Technical Report (see discussion in Section 5.2.1 of that report).

The assessment of visual effect due to the Project as described in Section 4.8.3 of the Final EIS considers changes to the visual landscape and viewer responses to those changes. This includes the existing development along the Project alignment. Within the Project corridor the environment changes from rural at the Wai'anae end of the corridor to dense high-rise development at the Koko Head end.

As part of the design process, the City has developed design principles, which are identified in the Honolulu High-Capacity Transit Corridor Project Compendium of Design Criteria (RTD 2009m) that will be implemented in final design to minimize visual effects of the Project. For example, guideway materials and surface textures will be selected in accordance with generally accepted architectural principles to achieve effective integration between the guideway and its surrounding environment. Landscape and streetscape improvements will mitigate potential visual impacts, primarily for street-level views.

Other measures to address visual impacts of the Project are being developed through the station design and planning process. The initial station area plans and design guidelines were first developed with coordination between DTS and the Department of Planning and Permitting (DPP). The next level of transit station design focuses on integrating individual neighborhood characteristics of the communities served by the stations.

The following mitigation framework will be included in the Project to minimize negative visual effects and enhance the visual and aesthetic opportunities that it creates:

- *Develop and apply design guidelines that will establish a consistent design framework for the Project with consideration of local context.*

- *Coordinate the project design with City TOD planning and DPP.*

- *Consult with the communities surrounding each station for input on station design elements.*

• *Consider specific sites for landscaping and trees during the final design phase when plans for new plantings will be prepared by a landscape architect. Landscape and streetscape improvements will serve to mitigate potential visual impacts.*

Section 4.8.3 of the Final EIS, Design Principles and Mitigation includes information related to the mitigation framework described above. Specifically architecture and landscape design criteria include guidelines regarding site design, materials and finishes, and lighting, which apply to stations, station areas, and the guideway.

The noise effects of the Project are presented in Section 4.10.3 of the Final EIS and were assessed following FTA noise impact analysis procedures. In addition, noise will not be continuous but episodic (only as trains pass). As noted in Section 4.10.3, with mitigation, operation of the Project will not cause any noise impacts.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
Creation Date :	12/9/2008
Creator Affiliation :	
First Name :	Arma
Last Name :	Oana
Business/Organization :	
Address :	2266 Waiomao Rd.
Alternative Preference :	
Apt./Suite No. :	
City :	Honolulu
State :	HI
Zip Code :	96816
Email :	Oanaa001@hawaii.rr.com
Telephone :	228-1690
Telephone Extension :	
Add to Mailing List :	None
Submission Method :	Website
Other Submission Method :	
Submission Date :	12/09/2008

Submission Content/Notes : I am in favor of the rail transit being diverted from Salt Lake and taken via the Airport area for the following reasons:
The number of citizen who can be services by the Airport route would serve the greater whole of the island. Those living in the Salt lake area have ample city buses that could take them to a connection site for rail, thus leaving Salt Lake, an already congested area during school hours, with less cars on the road, less construstion interfering with present businesses and again serving a greater population. The inclusion of runing the rail from Kalaeloa Blvd., whould even allow those in the homeless transition chelters a cheaper means of transport (instead of using their cars) and yet ample tranportation to Honolulu and work sites. The inclusion of UH Manoa, is a no brainer...let the rail take the people where they need to be! By providing ample tranportation to Manoa, rail will serve students who do not drive, cars can be left home for those who do and thus still saving all money! The extention to Waikiki..our source of revenues...tourism. The tourist already hear that Honolulu has one of the best City Bus systems in the USA, we rank high in terms of money saved instead of driving and providing the rail can provide a sense of safety for those moving about the island without knowing dangerous areas for tourist. More tourist traveing to the West side could mean better sales and job opportunities on the West side to cater to tourist from Waikiki. The proposed route change (via Airport) also allows for access to specific points of interest, Kapolei: the second city and soon to be new Family Court/Detention Services locations,Ewa Beach: reducing the already terrible traffic there, Waipahu and the outlet stores, Pearl City/Aiea, access to Pearl harbor, the mighty Mo and aloha Stadium for sports or swaps meets or concert events, The Airport area; just getting to the airport without having to bring your car, Kalihi/Honolulu to serve workers, Historical places such as access to the Palace, museums and gardens, District Courts and many meeting/business areas. Finally of course Ala Moana Center, which we all hope will still exist by the time rail is completed.
I may be retired by time the rail is completed, but that I still have reasons to travel out of Honolulu to get to the West side, which does not happen often enough now because of traffic, the long drive and gas.
I believe those supporters of rail are realistic and looking to the future, maybe my grand kids or even theirs..we need to plan for the next 100 years and take lessons learned form the last 50 years!
Please consider my comments and opinion when making final decisions for Rail Transit and its final route.
Mahalui Loa,,,Arma Oana

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010 RT9/090-331527

Ms. Arma Oana
2266 Waiomao Road
Honolulu, HI 96816

Dear Ms. Oana:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall indentify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

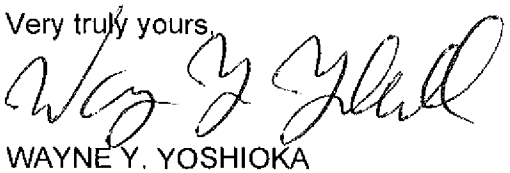
Your preference for the Airport Alternative has been noted. While each of the alternatives discussed in the Draft EIS includes trade-offs between benefits and impacts, the Airport Alternative from East Kapolei to Ala Moana has been selected as the Preferred Alternative as described above. As compared to the alternatives discussed in the Draft EIS, the Airport Alternative will carry the most passengers, provide the greatest transit-user benefits, and result in the fewest vehicle hours of delay. It will provide access to employment centers at Pearl Harbor Naval Base and Honolulu International Airport and will serve the Salt Lake neighborhood with connecting bus service. Of the three Build Alternatives addressed in the Draft EIS, the Airport Alternative will have slightly less impacts to the natural and built environment analyzed in the Draft EIS. During the public comment period on the Draft EIS, the public overwhelmingly supported the Airport Alternative. Of the comments that specifically supported one of the alternatives, more than 75 percent were in support of the Airport Alternative. For more

information this selection is discussed in Section 2.4 of the Final EIS. Since publication of the Draft EIS, design has been advanced, further analysis has been completed, and information has been added in response to comments on the Draft EIS and agency coordination. The Final EIS discusses the process that was used to select the Preferred Alternative, how comments were considered in the decision-making process, impacts and mitigation commitments.

The Project has logical termini at East Kapolei and Ala Moana Center and independent utility from any extensions that may be constructed in the future. The proposed future extensions to West Kapolei, Salt Lake Boulevard, Waikiki, and UH Manoa are discussed in the cumulative impacts sections of Chapters 3 and 4 of this Final EIS. However, the future extensions are not part of this Project, thus they are not required to be evaluated under Chapter 343 of the Hawaii Revised Statutes and NEPA. Under NEPA, environmental analysis is only required when there is a proposed action by a Federal agency. Here, because the future extensions are not proposed for implementation at this time, they are not part of the Project studied in this Final EIS. It would be premature to undertake an environmental analysis of the extensions (beyond the cumulative impacts analysis) because they are not part of the proposed action to be taken by the City and FTA. If the future extensions are proposed for implementation in the future, environmental analysis of the extensions and appropriate alternatives will be undertaken at that time. Bus service between Ala Moana Center and Waikiki and UH Manoa will be enhanced until those extensions are built.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,



WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
Creation Date :	1/11/2009
Creator Affiliation :	
First Name :	Jaimie
Last Name :	Obatake
Business/Organization :	
Address :	
Alternative Preference :	
Apt./Suite No. :	
City :	
State :	HI
Zip Code :	96816
Email :	jobatake2014@earthlink.net
Telephone :	
Telephone Extension :	
Add to Mailing List :	Email
Submission Method :	Website
Other Submission Method :	
Submission Date :	01/11/2009
Submission Content/Notes :	How long will it take to build the transit system? Thanks!

DEPARTMENT OF TRANSPORTATION SERVICES

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-333570

Jaimie Obatake
jobatake2014@earthlink.net

Dear Jaimie Obatake:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraph addresses your comments regarding the above-referenced submittal:

As illustrated in the schedule presented in Chapter 2 of the Final EIS, the Project is anticipated to be complete and in revenue service in 2019.

The FTA and DTS appreciate your interest in the Project. The Final EIS has been issued in conjunction with the distribution of this letter. You may view the Final EIS on the Project website at www.honolulutransit.org. You may request a DVD of the Final EIS and additional content through the "Contact Us" tab on the website or by calling the Project hotline at 566-2299. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Status :	Initial Action Needed
Creation Date :	1/12/2009
Creator Affiliation :	
First Name :	
Last Name :	
Business/Organization :	
Address :	
Alternative Preference :	
Apt./Suite No. :	
City :	
State :	HI
Zip Code :	96816
Email :	jobatake2014@earthlink.net
Telephone :	
Telephone Extension :	
Add to Mailing List :	None
Submission Method :	Website
Other Submission Method :	
Submission Date :	01/12/2009
Submission Content/Notes :	How much of a different in excise tax?

DEPARTMENT OF TRANSPORTATION SERVICES

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-333571

Jaimie Obatake
jobatake2014@earthlink.net

Dear Jaimie Obatake :

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraph addresses your comments regarding the above-referenced submittal:

Per Honolulu Ordinance 05-027, a one-half percent surcharge to the General Excise and Use Tax has been in place since January 1, 2007, and will remain in place through December 31, 2022.

The FTA and DTS appreciate your interest in the Project. The Final EIS has been issued in conjunction with the distribution of this letter. You may view the Final EIS on the Project website at www.honolulutransit.org. You may request a DVD of the Final EIS and additional content through the "Contact Us" tab on the website or by calling the Project hotline at 566-2299. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

298450

RECEIVED
09 FEB 5 P12:34
DIRECTOR'S OFFICE
DEPT OF
TRANSPORTATION SERVICES

TO: Department of Transportation Services
Mr. Wayne Yoshioka, Director
Department of Transportation Services
City and County of Honolulu
650 South King Street, 3rd Floor
Honolulu, Hawai'i 96813

January 31, 2009

FROM: Mr. Gary O'Donnell, Urban Designer
320 Liliuokalani Ave, Unit 2005
Honolulu, HI 96815

808 923-8107

SUBJECT: Comments on Honolulu High-Capacity Transit Corridor Project, Draft EIS

Thank you for all the time and effort that has gone into this precedent setting project. Overall I support this project. My comments are:

1. "Make no small plans." – *Frederick Law Olmstead, Landscape Architect for Central Park New York City, and World Columbian Exposition (The White City) Chicago, 1893.* My main concern with this project is not that it goes too far, but that it does not go far enough. Since a large part of our State's revenue is dependent on tourism, I support the Airport Route. We are going to look silly if we stop the rail just short of Waikiki at Ala Moana Shopping Center. Now is the time to build the rail to Waikiki and the University of Hawai'i (UH). Times of economic hardship are also times of economic opportunity, and rail transit is a chance to set Honolulu on a better course, which will pay back in many ways for years into the future. At the time Chicago was building the White City, our nation was headed into an economic downturn. The White City was a catalyst, full of new technology and aesthetic principles that invigorated our nation for decades into the 20th Century.
   a. As someone who has traveled Nimitz Highway, the H-1 Freeway, and Dillingham Boulevard for most of 21 years, I can attest to the fact that traffic is lighter when UH is on break. Extending the rail transit project now to UH will ease traffic congestion and speak volumes about the value of education.
   b. Having the rail go into Waikiki will provide an alternative means of travel for tourists and residents of Honolulu. Whether you are a resident celebrating a special occasion, or a member of the military looking for some rest and relaxation, being able to take rail transit as an alternative to driving in and out of our major entertainment district, Waikiki, is smart.
   c. With the hundreds of billions of dollars our Federal government has been, and is, pouring into our Nation's economy, even if the Honolulu Rail Transit project were to double in cost, it will provide more value in our future than any other project.
2. Rail provides room for more commuters in less space and moves them faster. Moving 30 miles per hour is faster than driving 10 miles per hour or less in rush hour traffic. (I sometimes beat the number 19, 20, and 42 buses at rush hour on my bicycle and I am not a fast biker!) Alternative projects are flawed.
   a. Buses running east and west across the south side of O'ahu get caught in vehicular traffic. Mass transit that is grade separated provides a more efficient commute, such as the New York City subway that I always took uptown and downtown during my 3 years there.

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b. Agree that rubber tires on pavement are not as efficient as steel wheels on steel rail – both energy wise and maintenance wise.
c. Elevated highways (no matter what you call them EZ-way, or Fly-way) pander to a false perception that you will have a shorter commute by getting closer to your destiny faster. In reality, you have to wait the same amount of time where the overhead freeway joins the other traffic. All the overhead freeway accomplishes is creation of the misperception that there is a shorter line of traffic, when in reality it is the same amount of traffic stacked, instead of spread-out long ways. Overhead freeways are also more visually intrusive in that they usually have a wide, low stance, creating a shadowy dungeon below, instead of a taller, narrower stance allowing sunlight below.

3. The Honolulu Rail transit should be thought of as a way to get to key points east and west on the south side of O'ahu, with a secondary on grade system providing transportation mauka-makai for those who cannot, or choose not to, walk a mile in a reasonable 20 minutes. The EIS should provide the proposed rearranged routes for the buses that connect at the transit stations.
   a. Passengers should be able to bring their bicycles on the train and continue to bring them on the bus. Passengers traveling to and from the airport should be able to carry one suitcase, a carry-on, and a personnel item.
   b. In order to create additional width on the train without widening the structure, the parapet on either side of the track should be removed (if possible), which will create an even narrower appearance for the overhead track. The train cars should be widened to cantilever over the edge of the track. The sides of the cars should extend down over the steel wheels and rail to quiet the movement of the train (providing the appearance of a monorail type train).
   c. The typical passenger train car design, which is over one hundred years old, should be re-thought. Instead of having masses of commuters entering and exiting the train through doorways that are not much larger than the doorway to someone's house, would it be possible to have the side of the train raise up (gull-wing, or a curved slide-up) to enable easy access and egress, and a piece drop down to cover the gap between the platform and the train. In this configuration seats would be placed in the middle allowing passengers to look out at the views over Honolulu as they pass by. The curved upper part of the train could have an energy efficient transparent material creating a sky and mountain view, giving an outward Art-Deco era motion appearance, like the Colorado Zephyr.
   d. Center platform stations should be used where possible to minimize the width of the rail stations. Where stations can also provide an alternative means for pedestrians to cross streets near dangerous intersections, concessions stands should be leased in these stations to create an incentive for pedestrians to go up and back down, rather than cross at street level.
   e. At busy rail stations where the stations cannot be built directly above or close to connections, a people mover should be provided to make the transition. Example: According to Figure 2-27, on page 2-30 the Airport Station appears to be on the other side of the airport parking garages from the front of the Airport terminal. Either locate the Airport Rail Station closer to the Airport Terminal (This avoids having to walk over a bridge through the garage area to get to the train) or install a people mover system to cover the distance across the bridge to the train.
   f. Kuntz Gate on Elliot Street provides access to Hickam AFB for the number 19 Bus, pedestrians, and bicycle riders. A total number of 16,096 persons work on Hickam AFB, which includes military, civilians, and contractors. Recommend locating a rail

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station near where the Airport Route crosses Elliot Street intersection with Nimitz Highway. A rail station at Elliot Street not only provides better access to Hickam AFB, but also provides better access to other facilities in this area, and to bus stops (sheltered by the Airport viaduct), and the popular bicycle path under the Airport viaduct. (Note: Appendix B, Drawing RW051, needs to show the intersection of Elliot Street and Nimitz Highway on the drawing.) An Elliot Street Station would also enable more frequent cycles of the number 19 Bus on Hickam AFB because the 19 Bus would not get caught in traffic around the Airport loop, or in traffic by the Pearl Harbor transit station should it be considered as an alternative transfer point.

4. Start construction of the rail transit system in the middle of the route at the Airport, and build outward in both east and west directions. This will get a difficult and important part of the rail system built first while tourism is in a downturn. It will enable more use of the rail system when the first parts of construction are complete. Tourists with a few hours between flights will be able to access the Arizona Memorial and Battleship Missouri (some of the most visited sites in Hawai'i). In the Diamond Head direction the rail would provide access between the Airport and Downtown Honolulu sooner than the proposed phasing of construction in this draft EIS
    a. Lay down yards for materials to start construction in this area could be located at Keehi Lagoon Park. Alternative access for paddlers may have to be established during construction. After construction Keehi Lagoon Park can be restored into a beautiful new landscape. Alternative lay down areas that could be considered are: along Lagoon Drive near the eastside of the Airport; Shafter Flats; or possibly Kapalama Military Reservation (further away, but closer to where construction materials arrive by ship). The cost of rail construction should include money for revitalizing areas disturbed by construction. Thus, the rail project will have a double impact, not only providing alternative efficient transport, but also revitalizing areas in current need of improvement.
5. Downtown Honolulu rail route should be reconsidered.
    a. Disruption of vehicular traffic during construction on Nimitz Highway is likely to cause major traffic delays. Example: On Oct. 30, 08 a truck got stuck in the middle of Alakea Street near the corner of Nimitz Highway during the evening rush hour. It backed-up traffic headed east on Nimitz all the way to Sand Island Road, because drivers had difficulty getting past vehicles waiting to turn Mauka on Alakea Street. The delay lasted about an hour till the truck was towed away.
    b. Rail stations help stimulate real property development [Transit Oriented Development (TOD)]. The lower downtown area along the waterfront near Aloha Tower Market Place is already an attractive area. There is not much room for TOD in this area without displacing the sense of place that attracts business and visitors to this area. Downtown Honolulu has a good blend of new buildings and well maintained historic buildings. If the balance were to be tilted toward more new development the smaller historic buildings would be replaced, and the downtown would loose its visual rich culture, actually degrading the area rather than improving it. Similar to the relationship between Lower and Mid-town Manhatten, growth in Downtown Honolulu needs to move Mauka.
    c. Security is also enhanced by routing the rail Mauka. Example: Around 2 PM on a sunny day in 1986 the Tsunami warning siren sounded. Commuters left their work for their homes, or places on higher ground, but before they could get where they wanted to go many had to travel east or west, and many took Nimitz Highway. Had the Tsunami occurred most commuters along Nimitz Highway probably would have been killed. The above grade rail transit provides a safer way to move east and west along the south side of O'ahu, provided it does not travel adjacent to the waterfront. During an on coming

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Tsunami people are encouraged to move to higher ground. Moving the rail Mauka would be an incentive for people to move Mauka. Otherwise there will be commuters walking to, and congregating at, the station on Nimitz Highway near Aloha Tower when a Tsunami warning siren sounds.

d. Instead of traveling past Downtown Honolulu along the waterfront, the rail route should turn from Dillingham Boulevard onto Liliha and turn east onto Vineyard Boulevard. Accommodations should be made if some residents need to be displaced in the housing complex on the corner of Liliha and Vineyard. If this cannot be worked, then an alternative may be to turn Mauka from Dillingham Boulevard along the Kokea. I prefer the Liliha route because the station near Kaaahi could provide on grade access to the waterfront area of the downtown if an on grade connection could be made out to Nimitz Highway from where Kaaahi now deadends.

e. From Vineyard Boulevard consider routing the rail along Lusitania Street in back of Queen's Hospital and turning Makai in back of the Board of Water Supply down Alapa to South Street and from there either turn east along the present route on Halekauwii, or Queen Street, or Kapiolani Boulevard. Halekauwii provides better access to the Medical School, but Kapiolani route would create some synergy for pedestrians enabling them to cross dangerous intersections near Keeaumoku and near the Convention Center.

f. This Mauka route should allow for new mixed income TOD and back-up office space and business development. It also provides potential for alternative transit close to Queen's Hospital.

g. If the Kapiolani route were to be chosen the rail transit should enter Waikiki via Kalakaua Ave. If the Halekauwii route is utilized, the rail transit system should take the intended course into Waikiki. Either way, instead of going down Kuhio Ave, there should be a Rail Transit Station in Fort DeRussy with a transfer to an on grade bus route around Waikiki. From the Fort DeRussy Rail Transit Station the rail route should turn Mauka through Kalaimoku, cross the Ala Wai Canel and proceed up University Avenue to UH. This enables good access to Waikiki and UH with less disruption.

6. While planning for the completion of the Rail Transit System the State, City and County of Honolulu, the Federal government, and Hawaiians should consider the possibility of hosting a World's Fair in Hawai'i. The Fair could be Asian, Pacific oriented and focus on how multi-nations and cultures can come together to improve the Environment, Technology, Economy, and Cultural Appreciation. The Columbian Exposition of 1893 and the New York World's Fair of 1938 raised spirits, provided hope, and helped to spur economic recovery. Gauntlets can be thrown down to challenge individuals, businesses, and Nations to display new energy efficient ways to travel to the islands with incentive prizes going to category winners that combine efficiency with speed, and/or best traveling experience. Just as the White City was the focus of the Columbian Exposition, "Honolulu a Garden City Expo" would be the focus of our fair with our new rail system the transportation heart of the fair, connecting dis-contiguous diverse exhibits, conferences, and events.

   a. Example UH could hold conferences and exhibits on reinventing public education as a life long learning experience, so that school systems serve people of all ages in their communities. How do we do this economically? Maybe a four 10-hour day work week would provide one day per week, or even every other week, when people can volunteer in their community. Some volunteer work could be meeting at the local school, learning from each other and then applying what you learn.

   b. A Medical Expo could be held near the transit station close to Queen's Hospital. Diet and exercise could be promoted as the means to long life without needing some of the

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futuristic medical procedures on display. Medical conferences could be held with the Medical Expo.

c. Aloha Stadium could be revitalized as not only a place for spectator sport events, but also a place for learning and participing in sports. Our Capital District could host Government meetings. Defense agencies could host conferences and exhibits on creating a stable secure world.

d. Like Expo 67 in Montreal, Canada, a diverse group of architects could design exciting new buildings for the Fair, near transit stations. The best part is, because our fair is discontiguous, these exciting buildings near rail transit stations can be utilized after the fair is over, and be a catalyst for TOD. Some of the ground breaking architecture from Expo 67 were: the USA Pavilion, a Geodesic Sphere influenced by Bucky Fuller; the German Pavilion, a tension structure by Frei Otto; and Habitat, a futuristic vertical community of homes that gave each family a rooftop garden, by Moshe Safdie.

e. Because the fair is spread along the transit route, visitors stopping at the different transit stations and exhibits can dine in Honolulu's diverse local restaurants, and patronize local businesses, and Arts and Craft Fairs etc.

7. Why "Honolulu a Garden City Expo?" What is a "Garden City?" Why is rail transit key to initiating reform of our built environment into "Garden Cities"? How will this save and protect the Aina?

a. Honolulu is uniquely positioned to become a model city to win the hearts and minds of Americans, and the International community, which can set a new course for the human environment around the globe. Hawai'i has natural resources to set a path toward energy independence. The Hawaiian culture provides a land use model for sustainability, where each community of the island gets a piece of diverse resources in each Ahupua'a. Our rail transit system will provide an energy efficient way of connecting these areas in Honolulu.

b. The term "Garden City" comes from Ebenzer Howard's book "Garden Cities of To-morrow." Much like the Hawaiian Ahupua'a system "Garden Cities of To-morrow" paints a vision of communities where each community has diverse land use. In Howard's vision, rail transit stations are near the gathering places of each community, and each rail station is in walking distance for most of the community. Small local farming occurs around the perimeter of each community, along with natural areas. Like Ebenzer Howard's "Garden Cities," rail transit is the most efficient way to join the various communities comprising Honolulu together.

c. In the evolution of cities around the world, we are at a turning point. For more than 100 years, success has been measured by rapid growth, accelerated by the industrial revolution. If we are to succeed in the next 100 years, success will be measured by sustainability and quality of life, rather than quantity of possessions consumed. The Interstate Highway system enabled rapid development of real estate to where extended suburbs (exurbs) have been built beyond the suburbs. We are at a point where the amount of roadway needed to be maintained and created for expanding populations will not improve quality of life. Rail transit is key to creating communities with improved quality of life and an efficient way of connecting communities. Creating quality communities around rail stations helps to save the Aina in much the same way the Ahupua'a system saved the Aina. Communities in walking distance to rail transit enable land outside walking distance to be transformed over time into gardens, small farms, recreation, and nature areas. Honolulu has the basic ingredients of a recipe to become a "Garden City." Other cities could follow by example. America could restore existing buildings and construct new buildings in areas like, Newark, N.J., South Chicago, and

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Detroit, creating a rich diversity of architecture within the "Garden City" concept. These parts of America's inner cities deteriorated as development grew further away from the inner city over the last 50 years.

8. What if we create a situation where Hawai'i becomes so desirable that we have too many visitors, part time residents, and new residents for the islands to sustain?
   a. Now that we are beyond the era where rapid growth can improve quality of life, and should be moving into an era where sustainable communities can improve quality life, part of maintaining quality of life for visitors and residents can be accomplished during the fair by declaring Hawai'i a State Park, and providing park passes (fair passes) to visitors and residents. This will enable a quality experience for all, and assure that Hawai'i continues to maintain an economic and cultural diversity of people.
   b. "Honolulu a Garden City Expo" (with its new rail transit system) would be the focus of this proposed World's Fair - as a separate project, coinciding with the completion of the Honolulu rail transit system. However, the other islands could also choose to have coinciding exhibits and events. Example: the Big Island could feature some alternative energy solutions. The Big Island also has some State land from the former sugar plantation that perhaps Japan, for example, may want to show-off an exhibit based on its small local farms centered around a small village. Although industrial farming appears to provide less expensive products, the Japanese system of farming may be less expensive because it puts more people to work. This localized farming would also thematically tie into the "Honolulu Garden City Expo." It also raises the discussion as to whether the core of the economic downturn is in part caused by producing too many goods, too efficiently, resulting in an oversupply of products and people out of work, as happened in the Great Depression after the boom of the 1920s. The answer may be decentralization of industry, and purchasing goods for longevity. This also ties into the "Garden City" theme because some industry is part of the "Garden City," and some of this industry could be assembly and repair shops. Local industry would assemble quality products that could then be locally repaired, extending a products life, putting more people to work, and conserving resources for all.
9. In summary, we are not just creating an alternative mode of transportation, we are determining a quality of life for our future. We need to get synergy out of this transit project by looking at coinciding opportunities.

Gary O'Donnell

Gary O'Donnell
Urban Designer
808 923-8107

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MUFI HANNEMANN
MAYOR

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DEPUTY DIRECTOR

May 21, 2010

RT2/09-298450R

Mr. Gary O'Donnell
320 Liliuokalani Avenue, Unit 2005
Honolulu, Hawaii 96815

Dear Mr. O'Donnell:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address comments regarding the above-referenced submittal:

1. Your support for the Project has been noted. While each of the alternatives includes trade-offs between benefits and impacts, the Airport Alternative from East Kapolei to Ala Moana Center has been selected as the preferred alternative. The identification of the Airport Alternative as the Preferred Alternative was made by the City to comply with FTA's NEPA regulations that state that the Final EIS should focus on the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative, public input on the Draft EIS, and City Council Resolution 08-261 identifying the Airport Alternative as the Project. The selection of the Airport Alternative is described in Chapter 2 of this Final EIS. The discussion of the alternatives considered is included in Chapter 2 of this Final EIS and the Alternatives Analysis. As discussed in Section 3.4.2 of this Final EIS, the Airport Alternative will carry the most passengers with 116,000 daily passengers and

282,500 daily trips in 2030, thereby resulting in the greatest transit-user benefits. The Airport Alternative will also result in the fewest vehicle miles traveled and vehicle hours of delay, as well as provide access to major employment areas including Honolulu International Airport, that will have substantially greater ridership than the other alternatives considered. Anticipated funds are not sufficient to extend the current project Koko Head of Ala Moana Center. Please see Chapter 6 of the Final EIS for more information concerning the Project' finances.

2. As stated in #1, the Airport Alignment will result in the fewest vehicle miles traveled and vehicle hours of delay, more information can be found in Chapter 3 of the Final EIS. An elevated Managed Lane Alternative was previously evaluated and eliminated for the reasons detailed in Section 2.1 of the Draft EIS.

3. The Project is intended to facilitate movement along the main "spine" of commuter activity in Honolulu. To address your other comments:

a. Rail vehicles will be designed to accommodate luggage that does not interfere with the safety or comfort of other passengers, to be regulated according to a luggage policy to be developed. No change to policy on TheBus is proposed at this time. Rail vehicles will also be designed to accommodate bicycles, which will be permitted on trains according to a bicycle policy to be developed.

b. The structure is required to have a side safety barrier. Using a solid parapet wall adds substantial noise reduction as well. The vehicle specifications include a wheel skirt that covers the wheel. It is made effective in combination with the parapet wall.

c. Such a configuration would reduce vehicle strength and add to vehicle weight, making the entire system less efficient.

d. Center platform stations generally have a greater total shaded area because of the need to widen and split the track structure prior to the station. Center platform stations are proposed where appropriate. DTS does not intend to compete with private enterprise by placing retail within stations.

e. A people-mover system is not part of the Project, but the Project does not preclude its construction. As shown in Figure 2-27 of the Draft EIS, the Airport Station will not be significantly farther away from the terminal than the parking garages. The Station will be connected to the parking garages and terminal by a pedestrian path.

f. The location of the Airport Station will not be changed. As noted in Section 2.2.2 of the Draft EIS, "bus service would be enhanced and the bus network would be modified to coordinate with the fixed guideway system." Existing and future bus routes, including route numbers and frequencies, are presented in Appendix D of the Final EIS.

4. As described in Section 2.5.10 of the Final EIS, to support phased opening of the system, the first construction phase must be connected to a maintenance and storage facility, which requires considerable land. The first phase of the Project must be connected to the maintenance and storage facility because, in addition to maintenance of equipment and ongoing operations, the maintenance and storage facility houses the main control center for the entire Project, and the required testing and operation of the system could not be completed without access to it. No location has been identified closer to Downtown, with sufficient available land to construct a maintenance and storage facility. The Project will be constructed in phases to accomplish the following:

- *Match the anticipated schedule for right-of-way acquisition and utility relocations.*
- *Reduce the time that each area will experience traffic and community disturbances.*
- *Allow for multiple construction contracts with smaller contract size to promote more competitive bidding.*
- *Match the rate of construction to what can be maintained with local workforce and resources.*
- *Balance expenditure of funds to minimize borrowing.*

The portion of the corridor Ewa of Pearl Highlands is less developed than the areas Koko Head. As a result, right-of-way can be obtained more quickly and overall Project construction can begin earlier, resulting in lower total construction costs. Construction is planned to continue uninterrupted Koko Head from Pearl Highlands to Aloha Stadium, then Kalihi, and finally to Ala Moana Center.

a. The suggested location of Keehi Lagoon Park is a publically owned recreational facility that may not be converted to transportation use. The other listed sites are not available or do not provide sufficient space for a facility. The Project will restore any areas directly affected by construction.

5. To address those comments:

a. As shown in Table 3-27 in the Final EIS, lane closures are expected on Nimitz Highway during construction. As stated in Section 3.5.7 of the Draft EIS, a Maintenance of Traffic (MOT) Plan will be developed by the contractor that must be approved by the City and the Hawaii Department of Transportation. The MOT Plan will help mitigate construction-related traffic effects.

b. As stated in Section 4.18.2 of the EIS, the Downtown Station area already has transit-oriented development (TOD) or TOD-like developments. Further redevelopment could occur, particularly around the Port, and incorporate more TOD elements in the future. Development in the historic districts is somewhat limited. The Project is unlikely to substantially alter future development plans in the Downtown area.

c. The platform will be more than 30 feet above street level. It will allow transit patrons to be above surge level.

d. The proposed alignment would result in several additional displacements, would be less centralized, and would not be able to serve Downtown and Kakaako as well as the Project. The Project includes a station at Kaaahi Street.

e. The proposed alignment would not meet the design criteria of a minimum 500-foot curve radius without the removal of several buildings.

f. A King Street alignment was evaluated in the Alternatives Analysis and shown to serve substantially fewer riders than the Dillingham to Kakaako alignment included in the Project.

g. As shown in Figure 2-8 of the Draft EIS, the Project follows Halekauwila Street.

6. Thank you for your suggestions. However, any such fair would be outside the authority of the DTS. In addition, it is not in the purview of the EIS to determine future uses of Aloha Stadium, which is under the jurisdiction of the State.

7 & 8. It is not in the purview of the EIS to initiate reform of the built environment into a "Garden City." The City plans, not the EIS, direct future development that will occur within the study corridor. In addition, thank you for submitting your ideas of integrating the Project with other opportunities. It is not within the purview of the EIS to address these opportunities.

9. Thank you for your comment.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Issuance of the Record of Decision under NEPA and acceptance of the Final EIS by the Governor of the State of Hawaii are the next anticipated actions and will conclude the environmental review process for this Project.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
Creation Date :	1/15/2009
Creator Affiliation :	
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Add to Mailing List :	Email
Submission Method :	Website
Other Submission Method :	
Submission Date :	01/15/2009
Submission Content/Notes :	I would like to find out address of properties in Mccully Moilili area that will be for rail station. I looked at map and one spot looks like ala wai park next to Kapiolani and Mccully. that would be great because it would not affect apartment rentals

DEPARTMENT OF TRANSPORTATION SERVICES

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-333917

Mr. Daniel Ogura
1919 Citron Street, #301
Honolulu, Hawaii 96826

Dear Mr. Ogura:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraph addresses your comments regarding the above-referenced submittal:

The Project has logical termini at East Kapolei and Ala Moana Center and independent utility from any extensions that may be constructed in the future. The future extensions to West Kapolei, Salt Lake Boulevard, Waikiki, and UH Manoa are discussed in the cumulative impacts sections of Chapters 3 and 4 of the Final EIS; however, the future extensions are not part of this Project. Thus, they are not required to be evaluated under Chapter 343 of the Hawaii Revised Statutes and NEPA. Under NEPA, environmental analysis is only required when there is a proposed action by a Federal agency. Here, because the future extensions are not proposed for implementation at this time, they are not part of the Project studied in the Final EIS. It would be premature to undertake an environmental analysis of the extensions (beyond the cumulative impacts analysis) because they are not part of the proposed action to be taken by the City and FTA. If the future extensions are proposed for implementation in the future, environmental analysis of the extensions and appropriate alternatives will be undertaken at that time. The

anticipated future extension to the UH Manoa campus would include stations in the McCully vicinity. While the future extension has not been designed and is therefore subject to change, stations in the vicinity of McCully and Date Streets are anticipated. Appendix C of the Final EIS provides information about properties that will be affected by the Project for you to review.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

3003 Ala Napuaa Pl. #409
Honolulu, HI 96818

November 25, 2008

Honolulu Hale
530 S. King Street
Honolulu, HI 96813

Dear Mayor Mufi Hannemann,

I am writing to enquire you about the Rail Transit. I am afraid that I do not support this topic. I am aware of the fact that this will cost billions of dollars. I believe that we could use this money for other purposes. This money can be used to help our community's facilities, business, and schools, for our economy is going through a crisis. We should focus more on education to help further our learning of technology, for it is what our future holds.

I oppose the rail transit system for it does not look very nice and it can ruin the beauty of Hawaii, our paradise. It can be dangerous and harmful to our community for, accidents can occurred as of it has happened in the past, loud construction work will be an annoyance since there are houses and business taking place and it will take many years to plan and build. Some people do not support the idea because taxes will be raised and some do not have any need for the rail transit. Gas prices are decreasing and it would be more convenient to drive a car to get to places faster than to use the rail transit, waiting to get to your destination. The cost of the transit is high priced using our tax money, yet that's only to build it. After it is built, we would have to pay a fee to ride it which I'm afraid might be costly for Hawaii residents. The bus system is inexpensive and works perfectly fine and the same as if the rail transit would be used. In the end, this involves having too many technological and financial problems.

I am enclosing this and I hope that you can reconsider this thought. I appreciate your time being, Thank you and mahalo again for reading this.

Yours Sincerely,

Crysta Okabe
(student)

DEPARTMENT OF TRANSPORTATION SERVICES

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June 1, 2010 RT12/08-292234R

Ms. Crysta Okabe
3003 Ala Napuaa Place, #409
Honolulu, Hawaii 96818

Dear Ms. Okabe:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

While each of the alternatives discussed in the Draft EIS includes trade-offs between benefits and impacts, the Airport Alternative from East Kapolei to Ala Moana has been selected as the Preferred Alternative as described above. As compared to the alternatives discussed in the Draft EIS, the Airport Alternative will carry the most passengers, provide the greatest transit-user benefits, and result in the fewest vehicle hours of delay. It will provide access to employment centers at Pearl Harbor Naval Base and Honolulu International Airport and will serve the Salt Lake neighborhood with connecting bus service. Of the three Build Alternatives addressed in the Draft EIS, the Airport Alternative will have slightly less impacts to the natural and built environment analyzed in the Draft EIS. During the public comment period on the Draft EIS, the public overwhelmingly supported the Airport Alternative. Of the comments that specifically supported one of the alternatives, more than 75 percent were in support of the Airport Alternative. For more information this selection is discussed in Section 2.4 of the Final

EIS. Since publication of the Draft EIS, design has been advanced, further analysis has been completed, and information has been added in response to comments on the Draft EIS and agency coordination. The Final EIS discusses the process that was used to select the Preferred Alternative, how comments were considered in the decision-making process, impacts and mitigation commitments.

Regarding the possibility of using Project money for other purposes, the enabling legislation for the General Excise and Use Tax (GET) surcharge precludes the use of the collected funds for purposes other than a fixed guideway transit system.

Your letter also commented on the visual aspects of the Project. The island's unique visual character and scenic beauty were considered in the visual and aesthetic analysis presented in the Draft and Final EISs. As discussed in Section 4.8 of the Final EIS, the Project will be set in an urban context where visual change is expected and differences in scales of structures are typical. The following measures will be included with the Project to minimize negative visual effects and enhance the visual and aesthetic opportunities that it creates:

- *Develop and apply design guidelines that will establish a consistent design framework for the Project with consideration of local context.*
- *Coordinate the project design with the City's transit-oriented development program within the Department of Planning and Permitting.*
- *Consult with the communities surrounding each station for input on station design elements.*
- *Consider specific sites for landscaping and trees during Final Design when plans for new plantings will be prepared by a landscape architect. Landscape and streetscape improvements will mitigate potential visual impacts.*

The Project will provide users, including tourists, with expansive views from several portions of the corridor by elevating riders above highway traffic, street trees, and low structures adjacent to the alignment. Section 4.8 of the Final EIS describes the effect of the Project on the visual environment 4 and provides simulations to convey a sense of the look and "feel" of the guideway. This section also shows simulations of many locations where the guideway will be built, with simulations comparing possible "before" and "after" conditions. It discusses mitigation of those effects through design, vegetation, and other means to preserve views and maintain as much as possible the integrity of the neighborhoods through which the guideway will run. Section 4.8.3 of the Final EIS also lists specific environmental, architectural, and landscape design criteria that will help minimize visual effects of the Project.

Regarding safety, Section 2.5.4 of the Final EIS states that the Project is designed to meet safety and security criteria typical of fixed guideway transit systems. Operation in exclusive right-of-way eliminates the potential for accidents between automobiles and fixed guideway transit vehicles. Because pedestrians will not be allowed to cross the tracks, the potential for pedestrian accidents is virtually eliminated. Platform edges will be delineated with high-contrast visual and textured markings. All stations, park-and-ride facilities, and vehicles will include security cameras that are monitored at all times of operation, will have audible and

visual messaging systems, and an intercom link to the system operations center. Security personnel will also patrol the system. Interior and safety lighting will be provided at all stations and park-and-ride facilities.

Construction noise will be a short-term impact, and all local noise ordinances will be followed to reduce noise annoyance to residences and schools. A variance will be obtained from the Hawaii Department of Health. The permit will regulate construction times and activities and include mitigation commitments. Construction effects are documented in Section 4.18.5 of the Final EIS in detail. All efforts will be made to minimize inconvenience during construction, but, as with any construction project, there will be some disruption.

The Project is being funded largely by a 0.5 percent increase in the GET surcharge that has been in effect since the beginning of 2007. Chapter 6 of the Final EIS describes the financial resources anticipated to be needed to pay for the capital costs of the Project and for ongoing operating and maintenance costs. Capital costs of the Project, including finance charges, are expected to be fully paid for by a combination of FTA Section 5309 New Starts Funds from the Federal government and the GET surcharge revenues collected from 2007 through 2022 on Oahu. Operating and maintenance costs will be paid for from the same sources currently used for TheBus, Federal funding, fare revenues, and City revenues from the General and Highway Funds.

Lastly, regarding your comments about the existing bus system, the cost to ride the fixed guideway will be the same as TheBus and free transfers will be provided between TheBus and the fixed guideway (and vice-versa). Gas prices are lower now but are not likely to stay that way; and even if you can drive to your destination, congestion will make the trip stressful and long. The same happens now with trips on TheBus. With increasing traffic congestion over the last 20 years, scheduled trip times for bus routes have been lengthened to reflect the additional time each bus trip takes. Transit inefficiency consumed $13.5 million in additional operating budget expenses in 2007 without adding new service. Roadway congestion would worsen by 2030 under No Build conditions, which would further decrease transit speed and efficiency. These limitations are detailed in Chapter 3 of the Final EIS. The Project will not suffer from congestion issues because it will be above grade and will not compete with cross-traffic, pedestrians, and bicyclists. The trip will be much faster than by car during peak periods and a lot less stressful.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

From: Yoshioka, Wayne
Sent: Tuesday, February 03, 2009 7:27 PM
To: Yadao, Elisa; Nishioka, Edward M.; Williams, Patrick
Cc: Miyamoto, Faith; Hamayasu, Toru; Thom, Sharon Ann; Stoeck, Lynette
Subject: FW: Honolulu Rail DEIS Comments
Importance: High

Aloha Elisa and Ed!

Another comment on the Rail DEIS.

A hui hou,

Wayne

From: G. ONISHI [mailto:g_onishi@msn.com]
Sent: Monday, February 02, 2009 8:14 PM
To: Yoshioka, Wayne
Subject: Honolulu Rail DEIS Comments

Dear Mr. Yoshioka,

2/4/2009

Thank you for allowing me to submit my comments on the proposed Honolulu Rail DEIS. I've attached it in Adobe PDF format. If I can be of any help, please respond to this email address.

Thank you,

G. Onishi
Email: g_onishi@msn.com

DISCLAIMER: This message is only intended for the addressee named above. Its contents may be confidential, privileged or otherwise protected. Any unauthorized use, disclosure or copying of this message or its contents is prohibited. If you are not the intended recipient, (i) please do not read or disclose it to others, (ii) please notify the sender by reply e-mail or phone, and (iii) please delete this communication from your system.

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2/4/2009

Honolulu Rail DEIS Comments
Regarding Route Termination at Ala Moana Center

Mr. Ted Matley
FTA Region IX
201 Mission Street, Suite 1650
San Francisco, CA 94105

Mr. Wayne Y. Yoshioka
Department of Transportation Services
City and County of Honolulu
650 South King Street, 3rd Floor
Honolulu, HI 96813

February 2, 2009

Dear Mr. Yoshioka, Mr. Matley and reviewing board,

Thank you for reviewing my comments to the City's DEIS on Honolulu's proposed rail system. I'd like to submit the current DEIS has neglected to present the details on the complete route approved by the city council and expected by the public.

Timeline:

1. In 2006, the City Council approved the fixed guide way route from East Kapolei to the University of Hawaii Manoa with a connection to Waikiki (DTS2006b).

2. In this past 2008 general election, there was a ballet question to approve or disapprove the fixed guide way system.
   a) The last information the public had on the proposed route was based in the Locally Preferred Alternative approved by the city council. The route was to go from Kapolei to University of Hawaii, Manoa and Waikiki.
   b) The city and other entities created television, print and radio ads showing students excited on a convenient way to get to school.

3. The DEIS came out after the general election.
   a) The DEIS does not contain any details of the route past Ala Moana Center.
   b) The DEIS does not contain any feasibility figures of the full route including UH Manoa or Waikiki.

The public was presented a route which included Kapolei, UH Manoa and Waikiki. The Manoa and Waikiki spurs may be future spurs; however, it will impact the current route. Full disclosure on its impact and viability should be included in this DEIS.

Thank you,

Gary Onishi
g_onishi@msn.com

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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HONOLULU, HAWAII 96813
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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010 RT9/09-334434

Mr. Gary Onishi
g_onishi@msn.com

Dear Mr. Onishi:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraph addresses your comments regarding the above-referenced submittal:

Your comments have been noted. As discussed in Section 1.1.2 of the Draft EIS, the City Council selected the First Project from East Kapolei to Ala Moana Center by Resolution 07-039. The First Project must be fiscally constrained to anticipated funding sources. The Project, as addressed in the Draft and Final EISs, reflects the limits established in Resolution 07-039. The Project has logical termini at East Kapolei and Ala Moana Center and independent utility from any extensions that may be constructed in the future. The proposed future extensions to West Kapolei, Salt Lake Boulevard, Waikiki, and UH Manoa are discussed in the cumulative impacts sections of Chapters 3 and 4 of the Final EIS. The future extensions are not part of this Project; thus, they are not required to be evaluated under Chapter 343 of the Hawaii Revised Statutes and NEPA. Under NEPA, environmental analysis is only required when there is a proposed action by a Federal agency. Here, because the future extensions are not proposed for implementation at this time, they are not part of the Project studied in the Final EIS. It would be premature to undertake an environmental analysis of the extensions (beyond the cumulative

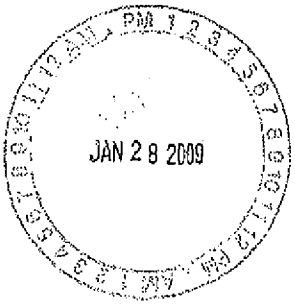
impacts analysis) because they are not part of the proposed action to be taken by the City and FTA. If the future extensions are proposed for implementation in the future, environmental analysis of the extensions and appropriate alternatives will be undertaken at that time.

The FTA and DTS appreciate your interest in the Project. The Final EIS has been issued in conjunction with the distribution of this letter. You may view the Final EIS on the Project website at www.honolulutransit.org. You may request a DVD of the Final EIS and additional content through the "Contact Us" tab on the website or by calling the Project hotline at 566-2299. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Comments to Honolulu Rail DEIS
Impact to Kakaako Mauka



Mr. Ted Matley
FTA Region IX
201 Mission Street, Suite 1650
San Francisco, CA 94105

Mr. Wayne Y. Yoshioka
Department of Transportation Services
City and County of Honolulu
650 South King Street, 3rd Floor
Honolulu, HI 96813

Governor Linda Lingle
Executive Chambers
Hawaii State Capitol
Honolulu, Hawaii 96813

January 17, 2009

Dear Gentlemen and Governor Lingle,

Overview
Kakaako Mauka is home for a diverse group of construction services, wholesalers, fabricators, mechanics, retailers and single family residents The DEIS, through the current rail alignment and TOD plans envision a vibrant mixed use urban environment The alignment favors a route which will force the city to take 82 partial and 24 full land parcels I'd like to submit the DEIS fails to recognize the current economic and social value Kakaako Mauka provides. It also fails to mitigate potential damage of displacing or interrupting the current business activity.

Economic Impacts
Businesses in Kakaako are in the area because of its unique location. Kakaako services the direct Honolulu Central Business district, Waikiki and surrounding Makiki, Manoa, residential areas. Any relocation effort to move these businesses outside of the Kakaako area would surely undermine the reason why they are in Kakaako. The DEIS does not address the impact of how displacement of these business will impact the surrounding loss of services these businesses provide The DEIS also indicates it will give 90 days notice for a resident or business to relocate This clearly is not enough time Many of these businesses have specialized equipment and site requirements. Selection of a new site, negotiating with the new sites owner and making the move clearly can not be done within that amount of time The DEIS does not address any specific mitigation measures

Markettrends Pacific studied the Kakaako business contribution in 2007. It revealed Kakaako Mauka's non retail population employed roughly 17,000 people. This is about 4% of Honolulu's non-agriculture workers Annual sales in 2006 were $2 02 billion or about 6% and 4% of Honolulu's and the State's economy respectively. *(Further information can be obtained from Market Trends Pacific 808-532-0733 or email. info@markettrendspacific com)* Displacement of Kakaako Mauka businesses would impact not only Kakaako businesses but also impact statewide economies.

Total / Partial Condemnation and Construction Impacts

The DEIS is vague on property acquisition mitigation solutions. The DEIS only says it will follow an outline provided by the Real Estate Acquisition Management Plan

To expand on the acquisition impact, the DEIS doesn't indicate if or how it would mitigate construction obstructions Construction obstructions can take many forms For example obstructions may include:

1. Location of support columns
    a. They may sit in the center of a street but interfere with egress or ingress of a property
    b. They may interfere with loading and unloading operations of a business
    c. They may interfere with the visibility of a business from the street.
2. Noise
3. Construction detours
4. Road closures
5. Loss of street parking

The extent of these impacts may be determined by the length of time and how meaningful each impact is on a business. For some businesses, these impacts may be permanent The DEIS offers no mitigation solutions

Partial property condemnations may also greatly impact business viability Per the Federal Real Estate Acquisition Plan, if partial condemnation impacts the economic viability of a property, the acquiring agency must offer the fair compensation for any remnant. If the City is required to acquire most of the 82 partially impacted properties, not to mention the hundreds outside of Kakaako, it brings to question the economic viability of the DEIS.

Kakaako businesses support Honolulu and the states economic base. These businesses are here now and are major contributors to Hawaii's economy and growth. The ripple effect of disruption to this base goes beyond any potential economic growth promised by TOD. The impacts go beyond the proposed alignment Disruption to Kakaako will affect the state economy now and into the future.

Sincerely,

Gary Onishi
g_onishi@msn com

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010 RT10/09-337447

Mr. Gary Onishi
g_onishi@msn.com

Dear Mr. Onishi:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

The following paragraphs address comments regarding the above-referenced submittal. As presented in Appendix B of the Final EIS, between the proposed Civic Center Station and the proposed Ala Moana Center Station, 61 total parcels will be affected through full or partial acquisition. Of the 61 affected parcels, 11 are proposed for full acquisition. The displacement of business from these parcels, assuming these businesses relocate in Honolulu, is not anticipated to generate economic impacts to the statewide economy.

As stated in the Final EIS, 4.4.3 Environmental Consequences and Mitigation: Where relocations will occur, compensation will be provided to affected property owners, businesses, or residents in compliance with all applicable Federal and State laws and will follow the Federal Uniform Relocation Assistance and Real Property Acquisition Policies Act (49 CFR 24). In addition to the minimum 90-day written notice will be provided before any business or resident will be required to move. The City will assist all affected persons in locating suitable

replacement housing and business sites within an individual's or business's financial means and these relocation services will be provided without discrimination so that all persons, organizations or businesses displaced by the Project will be treated fairly and equitably. Construction impacts on businesses are discussed in Section 4.18.1 of the Final EIS. As discussed, a Maintenance of Traffic (MOT) Plan will be developed to address temporary effects on access to businesses during construction. Proposed mitigation to reduce adverse economic hardships for existing businesses along the Project alignment during construction activities may include the following:

- *Coordinate construction planning and phasing with nearby property owners and businesses.*
- *Develop a public involvement plan prior to construction to inform business owners of the construction schedule and activities.*
- *Initiate public information campaigns to reassure people that businesses are open during construction and to encourage their continued patronage.*
- *Minimize the extent and number of businesses, jobs, and access affected during construction.*
- *To the extent practicable, coordinate the timing of temporary facility closures to minimize impacts to business activities—especially those related to seasonal or high sales periods.*
- *Minimize, as practical, the duration of modified or lost access to businesses.*
- *Provide signage, lighting, or other information to indicate that businesses are open.*
- *Provide public information (e.g., press releases or newsletters) regarding construction activities and ongoing business activities, including advertisements in print and on television and radio.*
- *Phase construction in each area so as to maintain access to individual businesses for pedestrians, bicyclists, passenger vehicles, and trucks during business hours and important business seasons.*
- *Provide advance notice if utilities will be disrupted and scheduling major utility shutoffs during non-business hours.*

As discussed in Section 4.4.1 of the Final EIS, generally, if only a portion of the property will be required and remain usable, then it is considered a partial acquisition. However, if a substantial amount of the land and/or the primary structure were located within the portion of the parcel to be acquired, then the entire property will be purchased. This is referred to as a full acquisition. As shown in Section 6.3.1 and Table 6-1 of the Final EIS, right-of-way costs, while significant, are a fraction of the total project budget.

Right-of-way information has been updated in the Final EIS. Please see Section 4.4 Acquisitions, Displacements, and Relocations as well as Table 4-4 the Acquisitions and Displacements Summary. In addition, Appendix C has parcel-by-parcel information for all anticipated acquisitions for the Project.

The FTA and DTS appreciate your interest in the Project. The Final EIS has been issued in conjunction with the distribution of this letter. You may view the Final EIS on the Project website at www.honolulutransit.org. You may request a DVD of the Final EIS and additional content through the "Contact Us" tab on the website or by calling the Project hotline at 566-2299. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Status :	Initial Action Needed
Creation Date :	12/6/2008
Creator Affiliation :	
First Name :	John
Last Name :	Ornellas
Business/Organization :	
Address :	2508 Komo Mai Dr
Alternative Preference :	
Apt./Suite No. :	
City :	Pearl City
State :	HI
Zip Code :	96782
Email :	storm482000@yahoo.com
Telephone :	808-454-0171
Telephone Extension :	
Add to Mailing List :	Email
Submission Method :	Website
Other Submission Method :	
Submission Date :	12/06/2008
Submission Content/Notes :	In my opinion the rail should be built from both ends and meet in the middle and build it using the airport route

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010 RT9/09-331303

Mr. John Ornellas
2508 Komo Mai Drive
Pearl City, Hawaii 96782

Dear Mr. Ornellas:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall indentify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraph addresses your comments regarding the above-referenced submittal:

As described in Section 2.5.10 in Chapter 2 and further in 8.6.9 in Chapter 8 of the Final EIS, to support phased opening, the first construction phase must be connected to a maintenance and storage facility, which requires considerable property. No location has been identified closer to Downtown with sufficient available property to construct a maintenance and storage facility; therefore, construction will begin between East Kapolei and Leeward Community College. The Project will be constructed in phases to accomplish the following:

- *Match the anticipated schedule for right-of-way acquisition and utility relocations.*
- *Reduce the time that each area will experience traffic and community disturbances.*
- *Allow for multiple construction contracts with smaller contract size to promote more competitive bidding.*

- *Match the rate of construction to what can be maintained with local workforce and resources.*
- *Balance expenditure of funds to minimize borrowing.*

The portion of the corridor Ewa of Pearl Highlands is less developed than the areas Koko Head. Therefore, the right-of-way can be obtained more quickly, which will allow the overall project construction to begin sooner, resulting in lower total construction costs. Construction is planned to continue uninterrupted Koko Head from Pearl Highlands to Aloha Stadium, then Kalihi, and finally to Ala Moana Center.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
Creation Date :	11/20/2008
Creator Affiliation :	
First Name :	Calvin
Last Name :	Oshiro
Business/Organization :	
Address :	
Apt./Suite No. :	
City :	
State :	HI
Zip Code :	96706
Email :	calvin@himc.biz
Telephone :	
Telephone Extension :	
Add to Mailing List :	None
Submission Method :	*Website*
Other Submission Method :	
Submission Date :	11/20/2008
Submission Content/Notes :	I believe the rail should go the airport instead of Salt Lake. It just makes more sense. I will use the system when flying off island, but not if I needed to transfer my baggage to another train i.e. if route goes to Salt Lake. The city shouldn't allow one city council member to scew a good thing for the majority.

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-330577

Mr. Calvin Oshiro
mdarin@gmail.com

Dear Mr. Oshiro:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

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Your preference for the Airport Alternative has been noted. While each of the alternatives discussed in the Draft EIS includes trade-offs between benefits and impacts, the Airport Alternative from East Kapolei to Ala Moana has been selected as the Preferred Alternative as described above. As compared to the alternatives discussed in the Draft EIS, the Airport Alternative will carry the most passengers, provide the greatest transit-user benefits, and result in the fewest vehicle hours of delay. It will provide access to employment centers at Pearl Harbor Naval Base and Honolulu International Airport and will serve the Salt Lake neighborhood with connecting bus service. Of the three Build Alternatives addressed in the Draft EIS, the Airport Alternative will have slightly less impacts to the natural and built environment analyzed in the Draft EIS. During the public comment period on the Draft EIS, the public overwhelmingly supported the Airport Alternative. Of the comments that specifically supported one of the alternatives, more than 75 percent were in support of the Airport Alternative. For more information this selection is discussed in Section 2.4 of the Final EIS. Since publication of the

Draft EIS, design has been advanced, further analysis has been completed, and information has been added in response to comments on the Draft EIS and agency coordination. The Final EIS discusses the process that was used to select the Preferred Alternative, how comments were considered in the decision-making process, impacts and mitigation commitments.

The FTA and DTS appreciate your interest in the Project. The Final EIS has been issued in conjunction with the distribution of this letter. You may view the Final EIS on the Project website at www.honolulutransit.org. You may request a DVD of the Final EIS and additional content through the "Contact Us" tab on the website or by calling the Project hotline at 566-2299. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

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THE OUTDOOR CIRCLE

February 6, 2009

Mr. Wayne Yoshioka, Director
Department of Transportation Services
City and County of Honolulu
650 South King Street, 3rd Floor
Honolulu, HI 96813

RE: **Honolulu High Capacity Transit Corridor Project Draft Environmental Impact Statement**

Aloha Mr. Yoshioka:

OVERVIEW

To paraphrase the Draft Environmental Impact Statement (DEIS), The Honolulu Transit Project is destined to become the most visually dominant and intrusive construction project in the history of Hawai'i. While its ability to ease traffic problems on O'ahu has been the subject of lengthy debate, its negative impact on the visual environment of this island cannot be denied and is virtually immeasurable.

The Outdoor Circle's review finds that the project's DEIS fails to adequately describe the cumulative impacts of the project and how those impacts will be mitigated with respect to view planes, street trees, landscaping, utility lines and overall intrusiveness in our communities. Additionally we do not find the information provided about the alternatives to contain enough detail to make an informed assessment of the project.

Throughout the comments provided in this document, all material in quotes and underscored have been copied word-for-word from the DEIS.

VIEW PLANES and COMMUNITY INTRUSIONS

The Honolulu High-Capacity Transit Corridor Project will become the single most dominant man-made feature in the State of Hawai'i. It will intrude upon "the open and undeveloped character" of the Ewa Plain. It will block views of parks, and historic sites in Pearl City. In the airport district it will "obstruct the views of East Loch and the Pearl Harbor historic sites" for hundreds of homes. Please provide details as to how these impacts will be mitigated. In Kalihi the raised guideway will be the "dominant feature in the views along Dillingham Blvd." In Chinatown the proposed project "blocks makai views," and will be "out of character with the pedestrian oriented environment" in one of the most historic and sensitive

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neighborhoods on the island. Again, no details are given as to how this will be mitigated. In order to analyze the full impacts of the project the EIS must provide specifics.

As it passes through the city's central business district, the guide way and the proposed Downtown Station will "be dominant features in the views along Nimitz Highway." It will "contrast substantially with the pedestrian character of the streetscape" and it will "substantially affect the visual setting of the Dillingham Transportation Building and Irwin Park." Finally it will "block makai views" from numerous residences. "Overall visual effects in this area would be high." As the project approaches historic structures such as the two listed above more consideration must be given to alleviating the negative impacts the guide way will have. Please provide more information.

As the guideway heads to Ala Moana Center there will be more "block(ed) views on the fourth and fifth floors of residences and offices" and will "increase light and glare on upper story residences." Throughout this part of the city the project will "block protected mauka-makai views of the Ko'olau and Waianae Mountains; the ocean and Honolulu Harbor and Diamond Head, Punchbowl and Aliamanu craters" "Overall the visual effects in these areas would be high." Once again we ask what efforts the city will undertake to lesson these impacts.

The assessments made in the DEIS are mostly based upon predicted impacts on people from fixed locations. Barely mentioned is the fact that the project also will have enduring, significant negative impacts on anyone who travels near it, whether a Windward or North Shore resident or one of the millions of people who visit our island every year.

The document contains broad promises of designing various elements to minimize negative visual effects. However, the lack of specific descriptions of how to overcome the visual impacts leaves our organization with little confidence that damages to the visual environment can or will be considered as the project moves forward. It is imperative that the EIS provide further explicit detail.

In addition, the document offers little in the way of alternatives. We believe that alternatives that have a lesser impact on the scenic environment should be studied and detailed. Only then can an informed decision be made.

STREET TREES

Of equal concern to The Outdoor Circle is the fate of literally hundreds of street trees. Honolulu has fostered a worldwide image of being a city full of beautiful trees. It is an important part of Honolulu's appeal to both residents and visitors. But the system's chosen alignment will result in the removal of more than 800 street trees. About one-half to two-thirds of those trees will be transplanted to unspecified "appropriate areas," but that leaves a possible deficit of more than 300 trees with no mitigation to the environment for the tree removals. For the sake of island aesthetics, pollution reduction, oxygen production, storm water reduction and ambient temperature moderation the city must revise its mitigation

plans so that the result of the project is a net increase of three shade trees for every one tree removed. Also, the EIS must be species specific as to what will be replanted.

Further, The Outdoor Circle knows how difficult it is to find available tree planting sites in our city. We believe the EIS must provide specific sites for tree relocations now. The language in the draft document is too vague. Please address this issue.

Of great distress is the proposal to eliminate "notable" trees in two separate areas. The project calls for the removal of 19 beautiful Kamani trees on the mauka side of Dillingham Boulevard near Honolulu Community College. It proposes keeping the Kamanis on the makai side which already have been severely pruned by HECO contractors to keep them away from the power lines. The result of this pruning has left these important trees barely recognizable. We believe the EIS must require that the power lines be placed beneath the fixed guideway or placed underground to eliminate additional blight. We also believe that keeping the badly misshaped Kamani trees while removing the beautiful, completely healthy trees across the street is unacceptable. The EIS should provide for the guide way alignment to shift to the makai side of Dillingham where the already compromised Kamanis could be removed instead of the beautiful trees on the mauka side.

Additionally, we find it completely unconscionable that the City would remove 23 beautiful, fully mature Monkeypod trees from Kapiolani Boulevard in the area of University Avenue as is proposed for the future alignment to the University of Hawai'i. The Kapiolani Boulevard Monkey Pod trees are a community resource that must be preserved and protected as they currently exist. The City must rethink and adjust the transit alignment that would result in the removal of any of the Monkey Pod trees on Kapiolani Boulevard.

The DEIS briefly discusses how to mitigate the "substantial damage" to street trees. However the language is uncertain and unconvincing. It states that a contractor "would prepare new planting plans," and that additional trees "could be planted to offset this impact." The Outdoor Circle does not believe "would and could" are the kind of guarantees the people of Honolulu are looking for. The final EIS must specifically state how the City intends to fully, not partially, mitigate the loss to our urban forest.

TREE PROTECTION

The DEIS fails to present plans for protecting existing trees during construction. These include trees in close proximity to the project elements including all transit stations, the fixed guide way and all other infrastructure that will be constructed or installed as part of the project. This oversight could result in significant negative impacts to the trees, their canopies and/or roots resulting in the unintended damage or destruction of hundreds of trees. It is absolutely essential that the EIS include detailed tree protection plans that meet the standards of the International Society of Arboriculture (ISA). The plan also must state that all tree protection work will be supervised by qualified certified arborists who will be present during construction to ensure the integrity of the tree protection plan is maintained.

LANDSCAPING PLANS

The DEIS fails to specifically outline plans for mitigating the visual impacts of each of the transit stations as well as the large pillars that will support the fixed guide way for the entire length of the project. The Outdoor Circle believes the EIS must be much more specific in its landscaping plans in order to reduce the hard, physical presence of hundreds of support columns in every community along the planned alignment. These plans must include the planting of adequate greenery—trees and/or shrubs—to reduce the substantial visual impacts of the concrete supports.
Equally intrusive and in desperate need of specific landscaping plans are the more than two dozen transit stations that will rise above the fixed guide way and surrounding neighborhoods. These plans must be laid out in the EIS and their costs incorporated into the project budget. Landscaping must be included from the project's initial conception and not as an add-on after the fact.

SIGNS and ADVERTISING

Also not included in the DEIS is any mention of a commitment by the City to reject proposals that would allow signage in, around or on any part of the project—including all "transit oriented development" that may violate existing state or county sign laws. The EIS must address this issue fully. Also, there must be an absolute prohibition against any exterior commercial advertising on the train, the transit stations or any portion of the transit infrastructure such as its maps. The failure to address these concerns is an oversight that must be corrected to ensure that this project will not deviate from the long-standing protection of the visual environment against the scourge of inappropriate off-site advertising or excessive signage.

UTILITY LINES

We believe that this project offers a unique opportunity for the City and County of Honolulu and the wide range of O'ahu's utility providers to remove a long standing and persistent eyesore from the visual environment. One of the most intrusive elements that detract from the beauty of Hawai'i is the overbearing presence of utility poles and lines. The Outdoor Circle believes that relocating all utility lines along the transit route and placing them underground or along the under side of the fixed guide way will enhance the view planes. In addition, committing to this action will provide some mitigation for the visual damage created by the project. The visual burden of the fixed guide way **and** existing overhead utility lines is unacceptable. The EIS should discuss the effects of the utility poles and lines in detail and then provide information on the cumulative impacts of the lines with the fixed guide way.

FINAL OBSERVATIONS

The Outdoor Circle believes the City has substantially downplayed the visual impacts the project will have on our communities and our quality of life. Nor does the city offer acceptable mitigation throughout the DEIS for the damage this project will inflict.

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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KENNETH TORU HAMAYASU
DEPUTY DIRECTOR

June 11, 2010 RT2/09-299022R

Mr. Bob Loy, Director of Environmental Programs
The Outdoor Circle
1314 South King Street, Suite 306
Honolulu, Hawaii 96814

Dear Mr. Loy:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

1. ***Concerns about View Planes and Community Intrusion***

The island's unique visual character and scenic beauty were considered in the visual and aesthetic analysis presented in the Draft and Final EISs. The Project will be set in an urban context where visual change is expected and differences in scale of structures are typical. The visual effects on Honolulu's Downtown are discussed under the Kalihi to Ala Moana Center Landscape Unit heading in Section 4.8.3 of the Final EIS.

It is acknowledged that the guideway and stations will noticeably contrast with smaller size buildings and the affect the undeveloped character of the Ewa plain and other areas along the alignment. In addition, views in the Downtown and the other areas referenced by the

commenter, including protected mauka-makai views (Honolulu Ordinance Section 24-1.4), will be blocked, and some views will change substantially, resulting in substantial visual effects. Section 4.8 of the Final EIS further assesses protected mauka-makai views from what was presented in the Draft EIS (see Tables 4-10 through 4-14 and Figures 4-39 through 4-50). Protected views and vistas are identified in policy documents that govern the project corridor and include protected mauka and makai views, as well as views of prominent landmarks. The protected views and vistas are identified in Figures 4-17 to 4-19. These figures are included in the Visual and Aesthetics Resources Technical Report (RTD 2008e).

Furthermore, protected views and vistas, including mauka and makai views and views of prominent landmarks in the study corridor are identified in City development plans, including the Ewa Development Plan, Central Oahu Sustainable Communities Plan, and the Primary Urban Center Development Plan. The Project is consistent with the land use objectives included in these plans (See Final EIS Appendix J.).

The assessment acknowledges that some view obstructions and changes to views will be unavoidable and substantial. They will be most noticeable where the guideway and stations are nearby or in the foreground of views. This includes views for those who travel near the alignment. The degree of visual effect will vary with the alignment orientation, guideway and station height, and height of surrounding buildings and trees, along with the viewer's expectations of view quality. It is also noted that the Project will conflict with Honolulu Ordinance Section 24-1.4 where project elements such as the guideway would block protected mauka-makai view corridors. View changes are not likely to be obtrusive in wider vistas or regional panoramic views where the project elements serve as smaller components of the larger landscape.

Section 4.8.3 of the Final EIS under the heading Design Principles and Mitigation, lists specific environmental, architecture and landscape design criteria to minimize visual effects of the Project. The Final EIS commits to the following measures to minimize negative visual effects and enhance the visual and aesthetic opportunities that it creates:

- *Develop and apply design guidelines that establish a consistent design framework for the Project with consideration of local context.*
- *Coordinate the project design with the City's TOD program within the Department of Planning and Permitting.*
- *Consult with the communities surrounding each station for input on station design elements.*
- *Consider specific sites for landscaping and trees during the final design phase when plans for new plantings will be prepared by a landscape architect. Landscaping, streetscape improvements, and utility relocation will mitigate potential visual impacts.*

It should also be noted that the Project will provide rail users with expansive views from several portions of the corridor by elevating riders above highway traffic, street trees, and low structures adjacent to the alignment.

2. ***Street Trees***

The city intends to fully mitigate the Project's impacts to Honolulu's street trees. Section 4.15 of the Final EIS includes information about notable trees and explains that:

> *Tree removal will be minimized to the greatest extent possible, but pruning is likely next to the guideway. Twenty-eight "Notable" true kamani trees along Dillingham Boulevard will be removed. Approximately 100 street trees will be pruned, 550 will be removed, and 300 will be transplanted. Mitigation measures will consist of transplanting existing trees or planting new ones. Pruning will be in compliance with City and County ordinances and require supervision by a certified arborist. The City will coordinate with the State of Hawaii Department of Transportation landscape architect.*

As requested, Section 4.15 of the Final EIS identifies the specific tree species to be transplanted.

As you stated in your letter, trees on the makai side of the street are already periodically pruned because of the presence of utilities. Trees on the mauka side of Dillingham Boulevard are not pruned and will be preserved. The Project will not affect any trees on Kapiolani Boulevard. Effects to street trees will be mitigated by transplanting existing trees or planting new ones, where possible. Trees suitable for transplanting that are displaced by construction will be relocated to the City project nursery until they can be transplanted to another part of the project area. The City will coordinate with HDOT's highway landscape architect. The City also will coordinate with SHPD for the removal of the group of 28 True Kamani Trees on the makai side of Dillingham Boulevard in accordance with the Programmatic Agreement (PA), Appendix H. The location where street trees will be transplanted will be selected based on project-specific criteria that could include the following:

- *Areas where existing landscaping will be lost along the corridor.*
- *Areas where opportunities exist for enhancing existing streetscapes near the study corridor.*
- *Areas where stations and parking lots will be constructed.*
- *Areas where shared benefits will be accomplished, such as areas adjacent to parks or historic sites.*

Street tree pruning, removal, and planting will comply with City ordinances and will require that a certified arborist manage the pruning of any Exceptional trees. Trees suitable for transplanting that are displaced by construction will be relocated to a City project nursery until they can be transplanted to another part of the project area. The City will coordinate with HDOT's highway landscape architect. In addition to transplanting existing trees, plans for new plantings will be prepared by a landscape architect during final design to further mitigate effects to street trees. To mitigate any substantial effects in areas that require tree removal, special attention will be given to developing landscaping plans so that new plantings will provide similar advantages to the community. If new plantings will not offer equitable mitigation (e.g., older

mature trees that are removed), additional younger trees could be planted that will, in time, develop similar benefits.

Specific sites for relocating and planting trees will be considered during the Final Design phase when plans for new plantings will be prepared by the Project's landscape architects. To mitigate any substantial effects in areas that require tree removal, special attention will be given to developing landscaping plans so that new plantings will provide similar advantages to the community. If new plantings will not offer equitable mitigation (e.g., older mature trees that are removed), additional younger trees could be planted that will, in time, develop similar benefits.

3. ***Tree Protection***

As discussed in Chapter 4, Section 4.18.8 of the Final EIS, street trees that require pruning for construction activities will be pruned more extensively than they will later for system operation. For street trees that will not be affected by system operation, a tree protection zone will be established during construction. The protection zone will be delineated by protective fencing.

4. ***Landscaping Plans***

The ongoing station area planning process involves numerous aspects of transit system design. The process addresses design and planning issues in an integrated manner and focus on the characteristics and preferences of the communities adjacent to each station.

Section 4.8 of the Final EIS addresses Visual and Aesthetic Conditions and mitigation measures derived in accordance with USDOT guidance. The assessment methodology used for this analysis is adapted from the Federal Highway Administration's (FHWA) Visual Impact Assessment for Highway Projects (Publication No. FHWA HI-88-054).

In Section 4.8.3 of the Final EIS, specific environmental, architecture, and landscape design criteria are listed that will help minimize visual effects of the Project. The City will implement the following measures to minimize negative visual effects and enhance the visual and aesthetic opportunities that the Project creates:

- *Develop and apply design guidelines that will establish a consistent design framework for the Project with consideration of local context.*
- *Coordinate the project design with the City's transit-oriented development program within the Department of Planning and Permitting.*
- *Conduct public involvement workshops to consult with the communities surrounding each station for input on station design elements.*
- *Consider specific sites for landscaping and trees during Final Design when plans for new plantings will be prepared by a landscape architect. Landscape and streetscape improvements will serve to mitigate potential visual impacts.*

Even with mitigation measures, some obstruction and changes to views will result in a high level of visual impact, or, a significant visual impact, and changes to some views will be unavoidable. These effects will be most noticeable where the guideway and stations are nearby or in the foreground of views.

Some views and vistas protected by City development plans will change as a result of the project, including public views along streets and highways, mauka-makai view corridors, panoramic and significant landmark views from public places, views of natural features, heritage resources and other landmarks. Depending on the degree of view obstruction or blockage, some changes in view will be significant. Viewers' response to these changes will vary with their exposure and sensitivity and depend on the alignment orientation, guideway and station height, and height of surrounding trees and buildings. View changes will be less notable in wider vista or panoramic views where the project elements are smaller components of the larger landscape. Generally, the project elements will not be dominant features in these views.

5. ***Signs and Advertising***

DTS has developed specifications and design criteria that establish Project requirements, please see Section 4.8.3 of the Final EIS. Commercial advertising on the system will be in compliance with State and City laws.

6. ***Utility Lines***

As discussed in Section 4.18.2 of the Final EIS, "Communication and coordination have been initiated with the affected utility agencies and companies and will continue throughout design and construction." Further, "Design criteria will govern all new utility construction outside of buildings, as well as the support, maintenance, relocation, and restoration of utilities encountered and affected by construction of the fixed guideway." In addition, "Along several roadway corridors, most existing overhead utilities in conflict with the guideway and safety clearance requirements will be relocated underground. Existing overhead electrical and communication utilities not in conflict with the aerial guideway and safety clearance requirements will remain overhead. Coordination will occur with emergency services and utility companies to ensure that utility relocations meet their needs and that sufficient clearance is provided. The City will evaluate relocation of utilities that are in conflict with the fixed guideway during preliminary design.

7. ***Final Observation***

As stated in the Executive Summary of the Final EIS, "The purpose of the EIS is to provide the City and County of Honolulu Department of Transportation Services Rapid Transit Division, the Federal Transit Administration, and the public and interested parties with the information necessary to make an informed decision, based on full and open analysis of cost, benefits, and environmental impacts of alternatives considered." This analysis, which is detailed in the Final EIS and related documentation, includes environmental commitments to avoid and/or reduce environmental effects. Further, additional analysis was included in the Final EIS based on comments received from the public on the Draft EIS.

Section 4.8.2 of the Final EIS states that the Outdoor Circle provided data or input on the visual assessment for the Project. In addition, Section 4.15.1 states that coordination with Outdoor Circle was initiated at the start of the NEPA process and that coordination will be ongoing as the Project progresses.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
Creation Date :	1/7/2009
Creator Affiliation :	
First Name :	Florita
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Add to Mailing List :	Standard
Submission Method :	Website
Other Submission Method :	
Submission Date :	01/07/2009
Submission Content/Notes :	I will ride the rail transit

DEPARTMENT OF TRANSPORTATION SERVICES

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

May 21, 2010

RT9/09-333490

Ms. Florita Pa
P.O. Box 31029
Honolulu, Hawaii 96820

Dear Ms. Pa:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraph addresses comments regarding the above-referenced submittal:

Your planned use of a Fixed Guideway Transit Alternative has been noted. While each of the alternatives includes trade-offs between benefits and impacts, the Airport Alternative from East Kapolei to Ala Moana Center has been selected as the Preferred Alternative. The identification of the Airport Alternative as the Preferred Alternative was made by the City to comply with FTA's NEPA regulations that state that the Final EIS should focus on the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative, public input on the Draft EIS, and City Council Resolution 08-261 identifying the Airport Alternative as the Project. The selection of the Airport Alternative is described in Chapter 2 of this Final EIS. The discussion of the alternatives considered is included in Chapter 2 of this Final EIS and the Alternatives Analysis. As discussed in Section 3.4.2 of this Final EIS, the Airport Alternative will carry the most passengers with 116,000 daily passengers

and 282,500 daily trips in 2030, thereby resulting in the greatest transit-user benefits. The Airport Alternative will also result in the fewest vehicle miles traveled and vehicle hours of delay, as well as provide access to major employment areas, including Honolulu International Airport, that will have substantially greater ridership than the other alternatives considered.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Issuance of the Record of Decision under NEPA and acceptance of the Final EIS by the Governor of the State of Hawaii are the next anticipated actions and will conclude the environmental review process for this Project.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

PACIFIC GUARDIAN CENTER

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January 30, 2009

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FTA Region IX
201 Mission Street, Suite 1650
San Francisco, CA 94105

Mr. Wayne Yoshioka
Department of Transportation Services
City and County of Honolulu
650 South King Street, 3rd Floor
Honolulu, HI 96813

Subject: **Draft Environmental Impact Statement Review Comments for the Honolulu High-Capacity Transit Corridor Project**

Dear Messrs. Matley and Yoshioka:

Pacific Guardian Center (PGC) supports the City's concept of a steel-on-steel rail fixed guideway system as an integral means of connecting our island communities. Because PGC is located along the proposed transit route and will be directly impacted by the project, we welcome this opportunity to comment on the Draft Environmental Impact Statement (DEIS) dated November 2008.

Existing Conditions

Pacific Guardian Center (PGC) is located within Honolulu's Central Business District, and the property is bounded by Bishop, Alakea, and Queen Streets, and Nimitz Highway. The property consists of the low-rise historic Dillingham Transportation Building (DTB), a pedestrian plaza, and two high-rise office towers (Mauka and Makai Towers) with a multi-level parking structure at the lower floors.

As noted in the DEIS, the DTB is listed on the Hawaii Register of Historic Places, and *"retains a high level of integrity, as the only major changes involve the creation of first-floor storefronts and two arcades by removal of some of the store spaces to provide Bishop Street access and address for the circa-1980 Pacific Guardian Center towers."*[1] It should be noted that this remarkable historic and architectural integrity is possible primarily because the pedestrian plaza serves as both a buffer from and a connection to the more recent Mauka and Makai towers.

The existing plaza consists of pedestrian circulation, outdoor seating, and open gathering areas defined by generously planted trees and landscaping. Tenants and visitors alike regularly enjoy this outdoor space for meals, informal meetings, work breaks, or while waiting for others. The plaza also provides a convenient venue for private daytime or evening events and programs. In short, this gathering place is a well-used and desirable tenant amenity. The plaza also serves as the primary pedestrian entry path for both the Mauka and Makai towers. Since on-site parking is housed within the base of the towers, many DTB tenants also access the DTB via the plaza. In addition, the water feature at the makai end of the plaza currently houses the DTB's only common trash enclosure. This water feature serves to screen off views of the roadway and masks traffic noise.

Proposed Changes

According to preliminary information provided by the City, our understanding is that the proposed Downtown Station platform along Nimitz Highway between Bishop and Alakea Streets will rise approximately 40 feet above grade and that the overhead canopy structure will be more than 55 feet tall. We also understand that the station platform will span a width of approximately 50 feet and that connecting stair concourses will extend that overhead coverage to nearly 80 feet. We also understand that approximately 2,400 sq ft of the plaza between PGC and DTB would be appropriated for the mauka Downtown Station entrance along Nimitz Highway. During transit system operating hours of 4 a.m. to midnight, trains would arrive every 3 to 10 minutes.[2]

Impacts to Dillingham Transportation Building, Pacific Guardian Center, and Plaza

We are therefore concerned that the location, size, and bulk of the proposed elevated guideway and Downtown Station as well as the large passenger volume will have significant and detrimental impacts to the DTB, PGC, and their respective tenants.

Although approximately 2,400 sq ft of the existing plaza is proposed to be appropriated for the new Downtown Station entrance, we respectfully disagree with the assertion that the Downtown Station entrance *"would not eliminate the open space or alter its use."*[3] According to the Draft EIS, the Downtown Station will be the primary destination for downtown Honolulu commuters and is projected to accommodate over 2,500 passengers within the 2 hour peak morning and evening hours and over 6,000 passengers are expected per day.[4]

The natural desire for convenience suggests that the majority of passengers will rely heavily upon the mauka station entrance as this offers a far more expedient access to the Central Business District than the station entrance on the makai side of Nimitz Highway. Our understanding is that this large volume of people passing in and out of the mauka station entrance will also require a significantly larger bulk and footprint than is proposed in order to provide adequately-sized stair, escalator, and elevator access. Furthermore, the remainder of the entire plaza will likely need to be forfeited and completely redesigned to properly accommodate this large flow of public pedestrian traffic. Corresponding increases in PGC's on-site security as well as operations and maintenance will be necessary. We are therefore deeply concerned that the open space of the plaza will be significantly reduced by a larger station entrance and that the use of the plaza will be changed from a private, tenant amenity to a public thoroughfare. We are also concerned that there is no available alternative location on the property for the displaced DTB trash enclosure.

While we sincerely appreciate the City's efforts to avoid locating the Downtown Station platform directly opposite to the historic DTB, it should be noted that the elevated guideway structure still remains approximately 40 feet from the DTB's Nimitz Highway façade, and the ewa end of the station is only 30-40 feet away from makai-Diamond Head corner of the building. This proximity of the elevated guideway structure and its supporting columns will block DTB tenants' makai views *"from fourth and fifth-story windows"*[5] and significantly diminish the economic value of these spaces. In addition, although the Draft EIS lists ground level noise readings near the Downtown Station, no projected noise exposure levels are provided for upper floor levels.[6] Since the proposed noise mitigation measures rely primarily on raised parapet walls along the edges of the guideway to direct upward and away from the ground, we are concerned that the noise of trains regularly passing immediately adjacent to the DTB and PGC will disturb and interrupt upper floor businesses and make it further difficult to attract and retain tenants in the affected spaces. We have similar concerns regarding detrimental impacts to tenants because *"trains traveling on the guideway would create light and glare, and the Chinatown and Downtown stations would increase this effect."*[7]

Although the several lanes of vehicular traffic along Nimitz Highway tend to discourage easy pedestrian travel between Downtown Honolulu and Honolulu Harbor, the proximity of DTB and PGC to Aloha Tower Marketplace and its views of and from Honolulu Harbor remain highly attractive features of the property. We are therefore concerned that the location, size, and bulk of the elevated guideway and station structures will only further visually and physically isolate our

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property from the Aloha Tower Marketplace and considerably diminish its connection with the waterfront. Because *"the addition of the guideway and columns would change the visual character of the streetscape and substantially affect the visual setting of the Dillingham Transportation Building and Irwin Park,"*[8] our fear is that the pedestrian environment along our property's Nimitz boundary will be significantly degraded.

We also remain doubtful of the City's assertion that the *"the project would cross, but not block, views along...protected mauka-makai street view corridors"*[9] when immediately following this the DEIS states that *"the guideway and columns would be dominant elements in makai views between Nimitz Highway and Queen Street, and views of the horizon would be partially blocked."*[10] Also contributing to our misgivings is the disclosure that *"the guideway and columns would reduce the open character of the streetscape, create shade and shadows, and block portions of makai views along...Bishop [Street]."*[11]

Recommendations

It is our understanding that compared to at-grade transit solutions, elevated systems require inherently larger station structures to accommodate necessary elevators, escalators, and stairs as well as connecting walkways and concourses. Despite being placed overhead, this larger overall bulk would seem to reduce the City's flexibility in planning suitable station and route locations in historic, visually-sensitive, and pedestrian-oriented districts.

We therefore strongly urge the City to consider implementing an at-grade, overhead wire light-rail transit system similar to popular systems in Portland, Denver, and Salt Lake City. Such technology would allow the transit system to safely operate at-grade along the transit corridor and to be elevated above-grade when required by local site conditions. We strongly suspect that this would offer the City increased flexibility in planning station and route locations and minimize the associated negative impacts along the transit route.

It is also our opinion that the Downtown Station should ideally be one of the most noteworthy transit stations by virtue of its high passenger volume and its anticipated role as the primary gateway to and from the Central Business District. This station's civic prominence also suggests that it should be located along a gracious, public pedestrian thoroughfare. In contrast, the proposed Downtown Station entrance between the DTB and PGC appears to be the smallest along the transit route especially when compared with stations of comparable or lesser ridership. The Draft EIS confirms that it *"would be the highest volume station in the system without an associated transit center".*[12] The proposed station entrance location also challenges pedestrians with a less obvious and less direct path. Passengers must either navigate around or through the DTB to access the primary mauka station entrance.

We therefore strongly urge the City to consider incorporating an at-grade Downtown Station into the TOPA Tower complex located between Bishop Street and Fort Street. Fort Street Mall is already a prominent existing public pedestrian thoroughfare, and it would provide a clear and direct user connection to the transit system because it runs straight through the core of the Central Business District from the Aloha Tower waterfront all the way to Beretania Street. While we appreciate that the DEIS considers Fort Street as an alternative, we respectfully disagree with the reasoning that a reduction of the rail's curve radius *"would result in increased travel time and a substantial decrease in user benefits."*[13] When approaching or departing from the Downtown Station, trains will naturally need to decelerate or accelerate from a stop, regardless of being located near a curve or not. Therefore, slower trains speeds near the Downtown Station should already be expected as part of normal operations, and rail curvature would not appear to be a relevant limiting factor in this case. Furthermore, an at-grade Downtown Station at TOPA Tower and Fort Street Mall avoids historic and visual impacts to Irwin Memorial Park, Aloha Tower, and the area in general.

If the Downtown Station must be located within the PGC property, we recommend that the City consider incorporating the Downtown Station into the DTB instead of appropriating any portions

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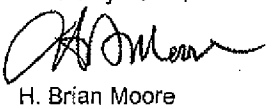
of the adjacent plaza, and we would be open to future discussions on how best to achieve this. In the meantime, we wish to point out that the DTB's first floor arcade could serve as a gracious station entrance and would more easily distribute heavy pedestrian traffic onto Bishop Street and perhaps Queen Street. In this way the Central Business District would be provided a more visible access point and an appropriately grander identity while conserving PGC's tenant use of the plaza. Incorporating the Downtown Station into the DTB would also offer a more cost effective alternative to the necessary acquisition of the entire plaza as a public thoroughfare. Adaptive reuse of the DTB could potentially allow the station spaces themselves to help buffer between passing trains and any remaining tenant areas. Finally, concealing much of the station structure within the DTB would result in significantly less visual impact to the area.

Pacific Guardian Center sincerely thanks the City and County of Honolulu for this opportunity to offer our comments and recommendations. We also appreciate the City's willingness to meet and update us on with preliminary plans and information regarding the Downtown Station.

Sincerely Yours,



H. Brian Moore
Vice President, Pacific Guardian Life
Asset Manager for Pacific Guardian Center

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[1] Draft EIS, p. 5-28
[2] Draft EIS, Table 2-5, p. 2-20
[3] Draft EIS, p. 5-29
[4] Draft EIS, Figures 3-10, 3-11, 3-12
[5] Draft EIS, p. 4-88
[6] Draft EIS, Figure 4-42
[7] Draft EIS, p. 4-88
[8] Draft EIS, p. 4-88
[9] Draft EIS, p. 4-89
[10] Draft EIS, p. 4-89
[11] Draft EIS, p. 4-88
[12] Draft EIS, p. 5-28
[13] Draft EIS, p. 5-34

AR00002778

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
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DEPUTY DIRECTOR

June 11, 2010

RT2/09-298447R

Mr. H. Brian Moore, Vice President
Asset Management Office
Pacific Guardian Life
737 Bishop Street, Suite 1600
Honolulu, Hawaii 96813

Dear Mr. Moore:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

Existing Conditions

Your comments are noted.

Proposed Changes

Your comments are noted.

Dillingham Transportation Building, Pacific Guardian Center, and Plaza

Your disagreement with the Project's assertion concerning the Downtown Station is noted. Chapter 5 of the Draft and Final EISs explains in detail the effect on the Pacific Guardian

Center complex and its plaza area. All affected facilities and services will be relocated as appropriate and the plaza maintained as a local amenity.

The visual effects on Downtown, including Aloha Tower, the Dillingham Transportation Building, and Irwin Memorial Park, are discussed under the "Kalihi to Ala Moana Center Landscape Unit" heading in Section 4.8.3 of the Final EIS. The Project will be set in an urban context where visual change is expected and differences in scales of structures are typical. The Final EIS acknowledges that the guideway will partially block mauka-makai public views from streets that intersect the alignment. However, the guideway will be in the median of Nimitz Highway, which is a busy thoroughfare comprised of six lanes of traffic.

The Final EIS further states that depending on the degree of view obstruction or blockage, some view changes will be significant. As stated in Section 4.8.3 of the Final EIS (see Viewpoints 13-18), "The Downtown Station and guideway will be dominant features in views along the Nimitz Highway." More specifically, this section states that the Project will "...block portions of makai views along the following perpendicular streets: Kekaulike, Maunakea, Nuuanu, Bethel, Fort, Bishop, and Richards." DTS will coordinate with the City to identify the particular needs of each view; however, changes to some views are unavoidable, including the periodic change in view when a train is passing by. The viewer's response to this change will vary with exposure and sensitivity and depend on the alignment orientation, guideway and station height, and the height of surrounding trees and buildings.

The Project will cause no severe noise impacts, and no impacts to your building. Moderate impacts will occur at several sites listed in Noise Impacts Table in Section 4.10.3 in the Final EIS. Noise levels at higher-level floors were analyzed and discussed in Section 4.10.3 of the Final EIS. The results show moderate noise impacts to one residential building between the Civic Center and Kakaako Stations. These findings are based on FTA Transit Project Noise Impact Criteria- Land Use Categories Table and FTA Transit Project Noise Exposure Impact Criteria Figure both in Section 4.10.1 of the Final EIS. As no noise impacts have been found for your building, there is no reason there would be any noise-related economic impacts to rental values. Once the Project is operating, noise levels will be re-measured to confirm that there are no project noise impacts.

Recommendations

The Alternatives Screening Memorandum (DTS 2006a) recognized the visually sensitive areas in Kakaako and Downtown Honolulu, including the Chinatown, Hawaii Capital, and Thomas Square/Honolulu Academy of Arts Special District. To minimize impacts on historic resources, visual aesthetics, and surface traffic, the screening process considered 15 combinations of tunnel, at-grade, or elevated alignments between Iwilei and Ward Avenue. Five different alignments through Downtown Honolulu were advanced for further analysis in the Alternatives Analysis, including an at-grade portion along Hotel Street, a tunnel under King Street, and elevated guideways along Nimitz Highway and Queen Street (Figure 2-4).

The Alternatives Analysis Report (DTS 2006b) evaluated the alignment alternatives based on transportation and overall benefits, environmental and social impacts, and cost considerations. The report found that an at-grade alignment along Hotel Street would require the acquisition of more parcels and could potentially affect more burial sites than any of the other alternatives considered. The alignment with at-grade operation Downtown and a tunnel under

King Street, was not selected because of the environmental effects, such as impacts to cultural resources, reduction of street capacity, and property acquisition requirements of the at-grade and tunnel sections, which would cost an additional $300 million.

The Project's purpose is "to provide high-capacity rapid transit" in the congested east-west travel corridor (see Section 1.7 of the Final EIS). The need for the Project includes improving corridor transit mobility and reliability. The at-grade alignment would not meet the Project's Purpose and Need because it could not satisfy the mobility and reliability objectives of the Project (see bullets below). Some of the technical considerations associated with an at-grade versus elevated alignment through Downtown Honolulu include the following:

- ***System Capacity, Speed, and Reliability***—*The short, 200-foot (or less) blocks in Downtown Honolulu would permanently limit the system to two-car trains to prevent stopped trains from blocking vehicular traffic on cross-streets. Under ideal operational circumstances, the capacity of an at-grade system could reach 4,000 passengers per hour per direction, assuming optimistic five minute headways. Based on travel forecasts, the Project should support approximately 8,000 passengers in the peak hour by 2030. Moreover, the Project can be readily expanded to carry over 25,000 in each direction by reducing the interval between trains (headway) to 90 seconds during the peak period. To reach a comparable system capacity, speed, and reliability, an at-grade alignment would require a fenced, segregated right-of-way that would eliminate all obstacles to the train's passage, such as vehicular, pedestrian, or bicycle crossings. Even with transit signal priority, the at-grade speeds would be slower and less reliable than an elevated guideway. An at-grade system would travel at slower speeds due to the shorter blocks, tight and short radius curves in places within the constrained and congested Downtown street network, the need to obey traffic regulations (e.g., traffic signals), and potential conflicts with other at-grade activity, including cars, bicyclists, and pedestrians. These effects mean longer travel times and far less reliability than a fully grade-separated system. None of these factors affects an elevated rail system. The elevated rail can travel at its own speed any time of the day regardless of weather, traffic, or the need to let cross traffic proceed at intersections.*

- ***Mixed-Traffic Conflicts***— *The Project will run at three minute headways. However, three-minute headways with an at-grade system would prevent effective coordination of traffic signals in the delicately balanced signal network in downtown Honolulu. A disruption of traffic signal cycle coordination every three minutes would severely affect traffic flow and capacity of cross-streets. Furthermore, there would be no option to increase the capacity of the at-grade rail system by reducing the headway to 90 seconds, which would only exacerbate the signalization problem. An at-grade system would require removal of two or more existing traffic lanes on affected streets. This effect is significant and would exacerbate congestion. Congestion would not be isolated to the streets that cross the at-grade alignment but, instead, would spread throughout Downtown. The Final EIS shows that the Project's impact on traffic will be isolated and minimal with the elevated rail, and, in fact will reduce system-wide traffic delay by 18 percent compared to the No Build Alternative (Table 3-14 in the Final EIS). The elevated guideway will require no removal of existing through travel lanes,*

while providing a reliable travel alternative. When traffic slows, or even stops due to congestion or incidents, the elevated rail transit will continue to operate without delay or interruption.

An at-grade light rail system with continuous tracks in-street would create major impediments to turning movements, many of which would have to be closed to eliminate a crash hazard. Even where turning movements are designed to be accommodated, at-grade systems experience potential collision problems. In addition, mixing at-grade fixed guideway vehicles with cars, bicyclists, and pedestrians presents a much higher potential for conflicts compared to grade-separated conditions. Where pedestrian and automobiles cross the tracks in the street network, particularly in areas of high activity (e.g., station areas or intersections), there is a risk of collisions involving trains that does not exist with an elevated system. There is evidence of crashes between trains and cars and trains and pedestrians on other at-grade systems throughout the country (e.g., Phoenix, Houston, LA). This potential would be high in the Chinatown and Downtown neighborhoods, where the number of pedestrians is high and the aging population presents a particular risk.

- ***Construction Impacts***—*Constructing an at-grade rail system could have more effects than an elevated system in a number of ways. The wider and continuous footprint of an at-grade rail system compared to an elevated rail system (which touches the ground only at discrete column foundations, power substations, and station accessways) increases the potential of utility conflicts and impacts to sensitive cultural resources. In addition, the extra roadway lanes utilized by an at-grade system would result in increased congestion or require that additional businesses or homes be taken to widen the roadway through Downtown. Additionally, the duration of short-term construction impacts to the community and environment with an at-grade system would be considerably greater than with an elevated system. Because of differing construction techniques, more lanes would need to be continuously closed for at-grade construction and the closures would last longer than with elevated construction. This would result in a greater disruption to business and residential access, prolonged exposure to construction noise, and traffic impacts.*

Because it is not feasible for an at-grade system through Downtown to move passengers rapidly and reliably without significant detrimental effects on other transportation system elements (e.g., the highway and pedestrian systems, safety, reliability, etc.), an at-grade system would have a negative system-wide impact that would reduce ridership throughout the system. The at-grade system would not meet the Project's Purpose and Need and, therefore, does not require further analysis.

In addition, high passenger volumes are expected at this station with many riders heading to office buildings and other destinations Downtown. As you recommend in your letter, a station entrance through the first-floor arcade of the Dillingham Transportation Building is being incorporated into the design. Signage will help first-time users find the station entrance. As discussed in the Final EIS, the TOPA Tower complex location was evaluated and eliminated because it does not meet the Project's design criteria.

The Project is attempting to minimize all impacts to the Dillingham Transportation Building. The station entry design is envisioned to open into the existing plaza, with pedestrians approaching the entrance primarily through the Dillingham Transportation Building arcade. DTS does not plan to acquire or use the entire plaza.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
Creation Date :	12/19/2008
Creator Affiliation :	
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Add to Mailing List :	Both
Submission Method :	Website
Other Submission Method :	
Submission Date :	12/19/2008

Submission Content/Notes : I have two points I'd like to make about the development of the necessary and majority voted mass transit.
The re-routing around Salt Lake and through the airport was a way to trick the residents of Salt Lake to vote for the rail. In actuality, fairness is not met in the goals here, nor the other 5 goals but re-routing around the communities of Oahu.
I live in a family owned apartment in Waikiki and have been a personal witness to the unintended consequence of steel rebar rusting within the concrete it's put in. Every 30 years or so, steel on steel (in concrete) will have to be maintained to the point of rendering the whole system as being unreliable and not worth using. There will be so much construction in noise and delays of regular routes that it could render the entire project futile and money wasted. I think that even professionals are baffled by the causes of this phenomenon. (Otherwise they wouldn't build lanai's like the ones all over waikiki today) It could be a combination of steel, salt air (which is unescapeable to Hawaii, salt water (being in proximity to the ocean), we don't even know. And we probably cannot avoid construction continual costs in taxes, and permanent construction.
As we have seen in other cities that mass transit is a real and much needed relief to cities congestion and consumption. But all too many times, for example Seattle, if transit hasn't been done right, then the whole project could go bad. In Seattle, they voted to spend the largest amount of money on their dear city (and infrastructure) and 30 years ago invested in the Monorail. The monorail was so expensive (building it on "legs") that it only spanned about 4 blocks downtown (between hotels and shopping malls) No one but tourists (to Seattle, so not that many) use it. And now they are pitted in years of undecided election results because everyone is so burnt out of transits costs (they vote on something, then tax, and then vote to change it and all over again).

In Hawaii, we don't have the apathetic voters just yet. And we haven't already invested in bad mass transit infrastructure. We have a hopeful lot that's willing to see a change. So, please don't screw it up.

A registered voter and long time Hawaii resident,
Monika Panfiglio

DEPARTMENT OF TRANSPORTATION SERVICES

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-332248

Ms. Monika Panfiglio
2233 Ala Wai Boulevard, 3B
Honolulu, Hawaii 96815

Dear Ms. Panfiglio:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

The Draft EIS evaluated both the Salt Lake and Airport Alternatives. While there is trade-offs between the alternatives, as detailed in Chapter 7 of the Draft EIS, all Build Alternatives evaluated meet the Project's Purpose and Need. While each of the alternatives discussed in the Draft EIS includes trade-offs between benefits and impacts, the Airport Alternative from East Kapolei to Ala Moana has been selected as the Preferred Alternative as described above. As compared to the alternatives discussed in the Draft EIS, the Airport Alternative will carry the most passengers, provide the greatest transit-user benefits, and result in the fewest vehicle hours of delay. It will provide access to employment centers at Pearl Harbor Naval Base and Honolulu International Airport and will serve the Salt Lake neighborhood with connecting bus service. Of the three Build Alternatives addressed in the Draft EIS, the Airport Alternative will have slightly less impacts to the natural and built environment analyzed in the Draft EIS. During the public comment period on the Draft EIS, the public overwhelmingly supported the Airport Alternative. Of the comments that specifically supported one of the alternatives, more than 75 percent were in support of the Airport Alternative. For more information this selection is discussed in Section 2.4 of the Final EIS. Since publication of the Draft EIS, design has been advanced, further analysis has been completed, and information has been added in response to comments on the Draft EIS and agency coordination. The Final EIS

discusses the process that was used to select the Preferred Alternative, how comments were considered in the decision-making process, impacts and mitigation commitments.

The steel rails that will be used for the Project will be compatible for use in a marine environment. Steel rail is capable of long-term operation in such an environment. For example, train excursion service is still provided in Ewa using rails that are more than 100 years old. Steel wheel technology provides several benefits related to lifetime cost, reliability, and maintainability. In parallel with the alignment analysis, a five-member panel appointed by the City Council and the Mayor considered the performance, cost, and reliability of the five proposed technologies for the fixed guideway system. Monorail technology was among the technologies reviewed. The panel twice accepted public comment as part of this review. By a four-to-one vote, the panel selected steel wheel operating on steel rail as the technology for the Project evaluated in the Final EIS. The four panel members selected steel-wheel technology because it is mature, proven, safe, reliable, economical, and non-proprietary. Proprietary technologies, meaning those technologies that would have required all future purchases of vehicles or equipment to be from a single manufacturer, were eliminated because none of the proprietary technologies offered substantial proven performance, cost, and reliability benefits compared to steel wheel operating on steel rail. Selecting a proprietary technology also would have precluded a competitive bidding process, likely resulting in increased overall project costs.

Project construction is scheduled to be complete in 2019. Neither construction activities nor construction costs are scheduled to continue beyond 2019. The financial plan includes provisions for ongoing preventive maintenance of the Project.

The Project will provide substantial congestion relief. As shown in the Final EIS, in comparison to the No Build Alternative, the Project will result in an 18 percent reduction in islandwide congestion, as measured by daily vehicle hours of delay. In addition, the projected ridership will be substantial once the Project is complete, with approximately 116,300 boardings daily for the system between East Kapolei and Ala Moana Center in 2030. Both visual and noise effects of the alternatives are discussed in Chapter 4 of the Draft and Final EISs.

Traffic impacts during construction are discussed in Section 3.5 of the Final EIS, and noise impacts during construction are detailed in Section 4.18 of the Final EIS. These temporary effects will not continue beyond the construction period; therefore, they will not have any effect on long-term system viability. Mitigation measures will be incorporated to lessen any construction-related traffic, noise, and environmental impacts.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

29869/

Jacqueline A. Parnell
129A Ulupa St
Kailua, Hawaii 96734

February 5, 2009

Mr. Wayne Y. Yoshioka
Department of Transportation Services
City and County of Honolulu
650 South King Street, 3rd Floor
Honolulu, HI 96813

RE: Draft Environmental Impact Statement for the Honolulu High Capacity Transit Corridor Project

Before I comment of the substance of the DEIS, I would like to draw attention to its production and distribution. It is not sufficient to make it available on DVD disk only. Many people are not computer literate and even we who are, prafer to have a hard copy when we are reading seriously. Also, the maps can only be printed out with a commercial-sized computer which can use 11 x 17 paper.

It would be far better to make a less beautiful and cheaper version which can be distributed widely. I should not have to pay $59 to get a real copy of the document or be limited to reading it at the library.

Please make any supplements and the Final EIS available to everyone.

I do not think the DEIS fully showed how large and ugly the elevated transit stations will be. They will not fit in with the character of our islands at all. We are already in trouble attracting tourists. This big ugly project will surely ensure that nobody will want to visit our "tropical paradise" again! People have voted for rail but I believe they were sold on it through false advertising. What they are picturing in their minds is nothing like what you have presented in the DEIS even though that is understated.

Even domestically it is inappropriate. In order to provide adequate ridership, we will have to have high-density developments around the stations. But that is not what the residents of Oahu want! There will be strong objections to the necessary rezoning. It does not seem fair to use the transit to create planning and zoning changes which would otherwise be rejected by the citizenry. This is "we know what's good for you whether you like it or not" planning. As a retired planning professional, I strongly object.

Sincerely yours

Jacqueline Parnell

Jacqueline Parnell, FAICP

RECEIVED
09 FEB 6 P12:32
DIRECTOR'S OFFICE
DEPT OF
TRANSPORTATION SERVICES

DEPARTMENT OF TRANSPORTATION SERVICES

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DEPUTY DIRECTOR

June 11, 2010

RT2/09-298691R

Ms. Jacqueline A. Parnell
129A Ulupa Street
Kailua, Hawaii 96734

Dear Ms. Parnell:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

The Draft EIS was available at local libraries and City offices. It was provided for free on disk to assist users in being able to search the document. Bound copies were provided at reproduction cost. The use of 11-by-17-inch pages and color in the document allowed maps to be reproduced at a readable resolution and photographs and other figures to best convey project information. The Final EIS is likewise being widely distributed in an easy-to-use format to maximize the ability of the public to review and understand its content.

Figures 2-10 through 2-12 of the Draft EIS showed detailed layouts for stations. Figures 2-14 through 2-37 of the Draft EIS showed the specific layouts to scale for each station area. Visual simulations of stations in several locations were provided in Figures 4-23, 4-24, 4-28, 4-29, and 4-32 of the Draft EIS. These have been further supplemented in the Final EIS.

The City is conducting workshops with communities that will have rail stations. The purpose of the workshops is to engage the public about rail stations and provide opportunities to residents to contribute ideas about the appearance of station entryways in their areas. Ideas generated at the workshops will be incorporated into the station planning process. For more information and to get involved in this process, please visit the project website at www.honolulutransit.org

The Project is focused exclusively on the construction and implementation of rail transit service, and that is what is covered in the Draft and Final EISs. However, as discussed in Section 4.19.2 of the Final EIS, transit-oriented development (TOD) is expected to occur in project station areas as an indirect effect of the Project. The increased mobility and accessibility that the Project will provide may also increase the desirability and value of land near stations, thereby attracting new real estate investment nearby (in the form of TOD). Planning and zoning around station areas will be conducted and established by the City's Department of Planning and Permitting under a process covered by the City's new TOD Ordinance 09-4.

In March 2009, the City approved and the Mayor of Honolulu signed TOD Ordinance 09-4, which defines the City's approach to TOD near fixed guideway stations. Future zoning regulations will address parking standards, new density provisions, open space, and affordable housing. Financial incentives could include public-private partnerships, real property tax credits, and infrastructure financing. While the Project is coordinating with City and State agencies to encourage development of enhanced pedestrian and bicycle facilities and other land use changes near stations, the actual construction of such facilities and zoning changes are beyond the scope of this Project. The special districts also encourage public input into the design of TOD neighborhood plans to reflect unique community identities.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

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Wayne Yoshioka
Director. DOTS
City and County of Honolulu
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February 5th, 2009

SUBJECT: Concerns about the draft Environmental Impact Statement (DEIS) for the proposed Honolulu Rail Transit System.

Dear Mr. Yoshioka:

Although I am an active member of the Honolulu Chapter of the American Institute of Architects this letter represents my personal opinions and should not be regarded as the official opinion or statement emanating from the Honolulu Chapter of the AIA. I have had my own Architectural firm since 1968 and have witnessed the progressive rising of construction costs here in Hawaii. . Since no major overhead rail system has been built in the United States for many years there has to be little confidence in obtaining a realistic cost comparison when projecting the costs of the current rail project . Preliminary engineering costs are but a shot in the dark. There are many obstacles ahead that will increase the present estimate. These include soil testing (lava tubes or unsuitable ground conditions), Hawaiian Burial sites, higher property acquisition costs, litigation, and the extensive relocation of utilities to name a few. Major construction projects on the mainland have generally increased by forty or more per cent from original estimates. The final cost will only be established when final construction drawings are prepared, and even then one can expect many change orders.

There are so many inaccuracies in the above referenced document that it is hard to decide just where to begin in setting out a sound response to its many flaws. Before listing these many shortfalls it is important to state up front that in spite of the results of the recent election , forty nine percent of Oahu residents did not vote in favor of the project. This happened in spite of millions of taxpayer dollars being spent by the city on fraudulently false propaganda. One of the most outlandish claims hurled at the voters on television and radio prior to the election was the heralding of the success of the Charlotte rail system. That system is a LIGHT RAIL AT GRADE rail line and is nothing remotely similar to the proposed Honolulu project. I notice that even now in the City's "On The Move" newsletter of January 26th there continues to be praise for the LIGHT RAIL on grade Phoenix rail line which again has no similarity to the one that is proposed in the draft EIS . Both local daily newspapers heavily endorsed the scheme together with local politicians and a pro rail group partially financed by Parsons Brinkerhoff interests. In contrast the opponents of the project were greatly disadvantaged by having just limited grass roots financing and were only able to purchase very limited media advertising . And yet they still garnered almost half of the total election votes opposing the rail project as it now stands.

Perhaps the most glaring error in the slick advertising paid for by the taxpayers and aired relentlessly on TV and radio by the City was the showing of pictures of cars stalled in traffic. The draft EIS even admits (for once honestly!) that traffic will only get worse even with rail. Honolulu needs traffic relief NOW and the rail project does NOTHING to address that problem. The cold facts are that during construction over the next many years, with closing of lanes and disruption of businesses, traffic congestion will only be far worse. The State's newly revealed plans to add lanes to the H 1 freeway and its other extensive road improvement programs do at least address the traffic congestion problem. But this will result in a profusion of road closings caused by the competing projects.

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How in the world as the draft EIS states can there be "No adverse affects to neighborhoods" when the proposed high level rail line overpowers each street that it penetrates virtually destroying the very heart and soul of the neighborhood. On the subject of neighborhoods it is relevant to reflect on the recent games played by the City Council on the Salt Lake Alternative. In order to obtain the deciding original vote to approve the project, the Councilman for the Salt Lake area forced the Council to route the rail through his district. Prior to the election there was a tremendous sales pitch on persuading the Salt Lake area residents to vote for rail. They did. And guess what!!. Several days after the election the City Council decided to move the alternate alignment back to the airport. If voters in the Salt Lake area had known prior to the election that the routing through their community would be cancelled then the no rail vote might have persevered. In defense of the Salt Lake area Councilman it must be conceded that he is the one member who has concerns about the overall costs and who predicted that because of the lowering projections of the rail tax due to the current recession and a major drop off in tourist dollars that in a few years the rail project could be Two Billion dollars in arrears.

One of the most troubling sections in the draft EIS has been the failure to fairly address the alternative systems. A light rail system at grade is the preferred option in virtually every mainland city as it avoids the huge expense and aesthetic disaster of having an overhead rail system destroying the fabric of the historic urban area. It is simply not true that the light rail alternative at grade could possibly be more expensive than the proposed overhead rail project. The savings in having at grade stations would be considerable as there would be no need for escalators, elevators, stairs and the extensive concrete structures. Both the High Occupancy Hot Lanes (HOV) and the Transportation System Management Alternative (TSM) were also not adequately studied in the draft EIS. Both these systems have proven to be most successful in several mainland cities and would be far superior to the proposed overhead heavy rail project They would also cost much less of taxpayers money and would be completed in a shorter time frame than the presently proposed system. The statement on Page 2-1 of the draft EIS contains a gross falsehood by stating that the proposed overhead rail system would cost less and have less environmental community impact than the alternative projects. Many of the people that voted for the rail project did not realize that the proposed Elevated third rail project has no comparison to the Charlotte rail project that was so brazenly praised in the many television and radio advertising paid for with taxpayer money.

The recently opened Phoenix Light Rail System should provide a serious eye opener to those people who still believe that the proposed third rail overhead system proposed in the draft EIS is the answer to Oahu's traffic problems. The Phoenix system cost one point four million dollars for a twenty mile light rail at grade system, of which almost half was paid for by the Federal Government. The Phoenix metropolitan area has a population of over four million, more than four times that of Oahu and their light rail system was completed in four years The question is: why have the so called traffic experts burdened our city's taxpayers on this ill conceived project, costing (without future change orders) at least twice the cost of the Phoenix system. There are thirty five mainland cities that have chosen an on grade light rail system, whereas only one city ,Miami, (in the nineteen seventies)has chosen an elevated heavy third rail solution. Cleveland, Ohio which is sixteenth in Metropolitan area population has a heavy rail system and no city between Cleveland and Honolulu, which is in fifty sixth place in population has an overhead rail system.

The draft EIS admits that the so called ideal corridor is but one mile wide in places with the mountains on one side and the ocean on the other. To support a train of this magnitude it is imperative to have many miles of heavy urbanized population on both sides of the rail corridor not just mountains and ocean. If people today still insist on commuting with one person to a car and decline the choice of car pooling or the express bus then there is little chance that in the future they would board the train with its many stops and much more limited freedom of movement. The ridership projections appear to be grossly overstated. The fact of Honolulu being the third most expensive city in country, after New York and San Francisco, has resulted in more people leaving the State than those coming in. The following statement in the draft EIS in chapter 4,page 4 "....would reduce transportation energy consumption" is a pure lie. The true fact is that Light Rail at grade would consume eight times less BTU's per hour.

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There appears to be a total conflict of interest when having the main contractor on the project being the one to prepare the EIS, which in this case has resulted in the document becoming a highly suspect and prejudiced sales pitch in favor of the project. What is the point of even having an EIS if it is just to become a rubber stamp for the project. An independent EIS would have exposed the serious environmental and aesthetic concerns that this one does not honestly address.. It is comforting to know that a recent press release from the City described the next contract to be signed for the project. Having spent weeks responding to the draft EIS we are now told that this new contract will be a feasibility and risk management report. If this is to be an independent study then there is hope that the proposed rail project should be terminated since an impartial study will reveal that the proposed rail project is far too expensive and will do little to solve traffic congestion, the sole reason for its development. With the recent lingering dispute over the EIS for the Super Ferry service it is interesting to note that the Ferry issue was primarily about the impact on whales, whereas the draft EIS for rail has a thousand times more impact as it will essentially destroy the whole character of urban Honolulu.

The proposed elevated rail system will have a devastating effect on the neighborhoods over which it will pass, in many cases displacing businesses and private property. The elevated stations and overhead concrete guideway will dominate the existing skyline resulting in a blocking of ocean and mountain views. The sound of an overhead train passing every few minutes will have a major impact on the lives of those people working or living in the immediate vicinity of its path. This will be extremely severe where it penetrates and destroys the present character of Dillingham Boulevard, Halekauwila street and the other streets as it proceeds towards Ala Moana Center. There will also be serious negative impingement to the character of Chinatown and an overpowering negative effect as it penetrates downtown passing Bishop Street, Aloha Tower and Irwin Park. Several years ago there was a concrete overhead structure at the foot of Bishop Street which was demolished resulting in opening up the view to the harbor. Other cities such as San Francisco, Baltimore and New York have also removed obstructive concrete structures near the waterfront in order to recover important view planes to the harbor.

In looking to the future it is relevant to consider the major financial burdens that are facing the New York Metropolitan Transit system., which has the highest riderdship in America. The projected shortfall in millions of dollars is so critical that plans are afoot to lay off hundreds of workers, cut service on many of the routes, close down several stations, increase fares and charge tolls on all the presently free bridges in order to balance the budget. How can we even consider building this commuter train that will be running virtually empty for most of the day on an island just a small fraction of the size or population of New York. These mainland cities have major transportation projects already in place for many years and their financial problems are still severe although unlike Honolulu many of their systems have already been paid for.

With the almost daily breaks in the city's water lines and sewers and the serious eroding of the condition of the existing streets which have been neglected over the years it seems that these utilities are far more worthy of the spending of taxpayer money than the proposed heavy rail system which will do little to solve the traffic problems. On December 12th,2008 there were nine serious overflows of sewage being spilt into almost all shorelines of Oahu , not exactly the environment that the millions of tourists expect when they come to Oahu. The excise taxes put aside for the transit project will be falling far short of projections due to the failing economy and downturn in the tourist industry. The public hearings have addressed many of these concerns to the City Council but unfortunately the testimony given from many well qualified professionals and concerned citizens has fallen on deaf ears and the project continues to move forward regardless.

Where did we go wrong? In 2004 the candidate for Mayor had a strong campaign slogan which was "Do We Need it, Can we Afford it, Can we Maintain it" Nothing about rail, which surfaced some year or two after his election. Fast forward to today and the question is the same, and the answer is a resounding "NO"

The removal of hundreds of trees to accommodate the project is simply not acceptable and the construction of heavy concrete columns down the center of existing streets will have a devastating effect on each neighborhood that it penetrates. The vast areas under the overhead concrete guide ways will become urban eyesores, devoid of landscaping and presenting an opportunity for homeless shelters and accompanying crime. Dillingham Boulevard, Halekauwila Street and all the other existing streets below the rail line will be reduced to a dark and dreary no mans' land similar to the existing portion of Nimitz Highway under the H-1 running past the airport. The proposed land acquisition is also a major concern as it will force many residents and businesses to relocate from their present neighborhoods.

In spite of these many concerns it is troubling that the draft EIS in chapter four, page six states: "Since there would be no adverse effects to neighborhoods, no mitigation is required". Another great concern is that although the future extensions to Manoa and Waikiki are shown on the draft EIS maps, there is no evaluation given to the enormous environmental impact that these future branch lines would impose on these very special areas of Honolulu. It appears to be extremely imprudent of the City to even contemplate starting construction without receiving approval for the entire system. If as an architect I am commissioned to design a project, and after many months of preliminary design, the client (the taxpayer) determines that the project does not meet the requirements of cost, aesthetics and the reason for the project(easing traffic congestion), then the contract should be mutually terminated.

It is surely time to pull the plug on this ill conceived poorly planned project that will bankrupt Honolulu both financially and aesthetically placing a huge burden of debt and sacrifice on our children and grandchildren in the years ahead. It is time to start planning immediately either on the development of a light rail system at grade , or to reconsider the benefits of the alternatives and coordinate with the State in expanding its plans to overhaul and improve our badly neglected highway system. The City Council's vote for "Steel on Steel" could still be valid, but only with an on grade light rail system similar to the one that the City has been praising in Charlotte and Phoenix . In responding to the many concerns submitted from many associations and private citizens it is time for the City to address those concerns and terminate the current contracts . Nine years is too long to wait for a project that is too expensive, does not solve our traffic problems and will forever destroy the character of our city.

Sincerely Yours

Geoffrey G,. Paterson AIA Emeritus

Cc: Ted Matley FTA San Francisco
Governor Linda Lingle
Mayor Mufi Hanneman
Todd Apo,Chair and members of the City Council of Honolulu City Council
Senator Dan Inouye
Senator Dan Akaka
US.Representative Neil Abercrombie
US.Representative Mazie K. Hirono
Laura Thielen DLNR
Colleen Hanabusa, Senate President
Calvin K.Y. Say, Speaker of the House

DEPARTMENT OF TRANSPORTATION SERVICES

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June 11, 2010 RT2/09-298735R

Mr. Geoffrey G. Paterson
217 Kailua Road
Kailua, Hawaii 96734

Dear Mr. Paterson:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

The FTA imposes guidelines for estimating costs to prevent the type of overruns mentioned in the comment. They include conservative cost factors and high contingencies. Cost estimates are carefully reviewed by various FTA representatives, and risks and uncertainties are considered in developing financial plans for the Project. Chapter 6 of the Final EIS discusses these, along with other financial information. The Federal government will contribute between 20 and 25 percent of the total capital cost.

Your comments on the election results have been noted. The Project is an entirely grade-separated transit system (see discussion below). However, the EIS process is independent of the electoral process or results that your letter mentioned.

Traffic conditions on highways will be worse in 2030 under any circumstances and regardless of which solution is applied. The key comparison is that the Project will improve conditions compared to what they would be if the Project were not built. With the fixed guideway system, total islandwide congestion (as measured by vehicle hours of delay) will decrease by 18 percent, compared to the No Build Alternative (see Table 3-13 in this Final EIS). In addition, traffic volumes were studied at various screenlines in the study corridor. The travel demand forecasting model was used to forecast traffic volumes at these screenlines in 2030, both with and without the Project (see Table 3-9 and Table 3-10 in this Final EIS). Analysis revealed that traffic volumes at these screenlines will decrease up to 11 percent with the Project. Accordingly, traffic conditions will be substantially better with the fixed guideway than any of the other alternatives studied. A Maintenance of Traffic (MOT) Plan, as discussed in Section 3.5.7 of the Final EIS, will be developed by the contractor and must be approved by the City and/or the Hawaii Department of Transportation. The MOT Plan will mitigate construction-related effects on transportation access and mobility. It will also address effects on streets and highways, transit, businesses and residences, and pedestrians and bicyclists.

As described in Section 3.4 of this Final EIS, modeling took into account committed transportation projects anticipated to be operational by 2030. Committed transportation projects are those identified in the Oahu Regional Transportation Plan (as shown in Table 2-4 of this Final EIS). These projects include a p.m. reversible "zipper" lane and widening the H-1 Freeway at Middle Street. As shown in Tables 3-9 and 3-10 of the Final EIS, roadway conditions will get worse despite these improvements. However, as shown in these tables, traffic conditions will improve up to 11 percent with the Project.

Your comment about neighborhoods is noted. The Project follows major roads and highways that have already created a barrier through neighborhoods. It will not create a substantial new barrier. The Project will improve connectivity between neighborhoods. Regarding the decision by City Council for the Airport Alternative, again, the EIS process is independent of the electoral process or results. General Excise and Use Tax (GET) surcharge revenue and FTA New Starts funds are anticipated to cover project construction costs.

The Alternatives Screening Memorandum (DTS 2006a) recognized the visually sensitive areas in Kakaako and Downtown Honolulu, including the Chinatown, Hawaii Capital, and Thomas Square/Honolulu Academy of Arts Special District. To minimize impacts on historic resources, visual aesthetics, and surface traffic, the screening process considered 15 combinations of tunnel, at-grade, or elevated alignments between Iwilei and Ward Avenue. Five different alignments through Downtown Honolulu were advanced for further analysis in the Alternatives Analysis, including an at-grade portion along Hotel Street, a tunnel under King Street, and elevated guideways along Nimitz Highway and Queen Street (Figure 2-4).

The Alternatives Analysis Report (DTS 2006b) evaluated the alignment alternatives based on transportation and overall benefits, environmental and social impacts, and cost considerations. The report found that an at-grade alignment along Hotel Street would require the acquisition of more parcels and could potentially affect more burial sites than any of the other alternatives considered. The alignment with at-grade operation Downtown and a tunnel under King Street, was not selected because of the environmental effects, such as impacts to cultural

resources, reduction of street capacity, and property acquisition requirements of the at-grade and tunnel sections, which would cost an additional $300 million.

The Project's purpose is "to provide high-capacity rapid transit" in the congested east-west travel corridor (see Section 1.7 of the Final EIS). The need for the Project includes improving corridor transit mobility and reliability. The at-grade alignment would not meet the Project's Purpose and Need because it could not satisfy the mobility and reliability objectives of the Project (see bullets below). Some of the technical considerations associated with an at-grade versus elevated alignment through Downtown Honolulu include the following:

- ***System Capacity, Speed, and Reliability***—*The short, 200-foot (or less) blocks in Downtown Honolulu would permanently limit the system to two-car trains to prevent stopped trains from blocking vehicular traffic on cross-streets. Under ideal operational circumstances, the capacity of an at-grade system could reach 4,000 passengers per hour per direction, assuming optimistic five minute headways. Based on travel forecasts, the Project should support approximately 8,000 passengers in the peak hour by 2030. Moreover, the Project can be readily expanded to carry over 25,000 in each direction by reducing the interval between trains (headway) to 90 seconds during the peak period. To reach a comparable system capacity, speed, and reliability, an at-grade alignment would require a fenced, segregated right-of-way that would eliminate all obstacles to the train's passage, such as vehicular, pedestrian, or bicycle crossings. Even with transit signal priority, the at-grade speeds would be slower and less reliable than an elevated guideway. An at-grade system would travel at slower speeds due to the shorter blocks, tight and short radius curves in places within the constrained and congested Downtown street network, the need to obey traffic regulations (e.g., traffic signals), and potential conflicts with other at-grade activity, including cars, bicyclists, and pedestrians. These effects mean longer travel times and far less reliability than a fully grade-separated system. None of these factors affects an elevated rail system. The elevated rail can travel at its own speed any time of the day regardless of weather, traffic, or the need to let cross traffic proceed at intersections.*

- ***Mixed-Traffic Conflicts***— *The Project will run at three minute headways. However, three-minute headways with an at-grade system would prevent effective coordination of traffic signals in the delicately balanced signal network in downtown Honolulu. A disruption of traffic signal cycle coordination every three minutes would severely affect traffic flow and capacity of cross-streets. Furthermore, there would be no option to increase the capacity of the at-grade rail system by reducing the headway to 90 seconds, which would only exacerbate the signalization problem. An at-grade system would require removal of two or more existing traffic lanes on affected streets. This effect is significant and would exacerbate congestion. Congestion would not be isolated to the streets that cross the at-grade alignment but, instead, would spread throughout Downtown. The Final EIS shows that the Project's impact on traffic will be isolated and minimal with the elevated rail, and, in fact will reduce system-wide traffic delay by 18 percent compared to the No Build Alternative (Table 3-14 in the Final EIS).*

The elevated guideway will require no removal of existing through travel lanes, while providing a reliable travel alternative. When traffic slows, or even stops due to congestion or incidents, the elevated rail transit will continue to operate without delay or interruption.

An at-grade light rail system with continuous tracks in-street would create major impediments to turning movements, many of which would have to be closed to eliminate a crash hazard. Even where turning movements are designed to be accommodated, at-grade systems experience potential collision problems. In addition, mixing at-grade fixed guideway vehicles with cars, bicyclists, and pedestrians presents a much higher potential for conflicts compared to grade-separated conditions. Where pedestrian and automobiles cross the tracks in the street network, particularly in areas of high activity (e.g., station areas or intersections), there is a risk of collisions involving trains that does not exist with an elevated system. There is evidence of crashes between trains and cars and trains and pedestrians on other at-grade systems throughout the country (e.g., Phoenix, Houston, LA). This potential would be high in the Chinatown and Downtown neighborhoods, where the number of pedestrians is high and the aging population presents a particular risk.

- ***Construction Impacts***—*Constructing an at-grade rail system could have more effects than an elevated system in a number of ways. The wider and continuous footprint of an at-grade rail system compared to an elevated rail system (which touches the ground only at discrete column foundations, power substations, and station accessways) increases the potential of utility conflicts and impacts to sensitive cultural resources. In addition, the extra roadway lanes utilized by an at-grade system would result in increased congestion or require that additional businesses or homes be taken to widen the roadway through Downtown. Additionally, the duration of short-term construction impacts to the community and environment with an at-grade system would be considerably greater than with an elevated system. Because of differing construction techniques, more lanes would need to be continuously closed for at-grade construction and the closures would last longer than with elevated construction. This would result in a greater disruption to business and residential access, prolonged exposure to construction noise, and traffic impacts.*

Because it is not feasible for an at-grade system through Downtown to move passengers rapidly and reliably without significant detrimental effects on other transportation system elements (e.g., the highway and pedestrian systems, safety, reliability, etc.), an at-grade system would have a negative system-wide impact that would reduce ridership throughout the system. The at-grade system would not meet the Project's Purpose and Need and, therefore, does not require further analysis.

In Chapter 2 – Alternatives Considered of the Alternative Analysis Report, November 2007, as well as in Chapter 2 – Alternatives Considered of the Final EIS, two options were considered for the Managed Lane Alternative - Two-direction and Reversible. This alternative would have provided a two-lane elevated toll facility between Waipahu and Downtown Honolulu,

with variable pricing strategies to maintain free-flow speeds for transit and high-occupancy vehicles (HOVs). The Two-direction Option would have served express buses operating in both directions during the entire day. To maintain free-flow speeds in the Two-direction Option, it may have been necessary to charge tolls to manage the number of HOVs using the facility. For the Reversible Option, three-person HOVs would have been allowed to use the facility for free, while single-occupant and two-person HOVs would have had to pay a toll. The Reversible Option was found to be optimal.

The findings are summarized in Chapter 2 of the Final EIS as follows: The Managed Lane Alternative was evaluated for its ability to meet project goals and objectives related to mobility and accessibility, supporting planned growth and economic development, constructability and cost, community and environmental quality, and planning consistency. While this alternative would have reduced congestion on parallel highways, systemwide traffic congestion would have been similar to the No Build Alternative as a result of increased traffic on arterials trying to access the facility. Total islandwide vehicle hours of delay would have increased with the Managed Lane Alternative compared to the No Build Alternative, indicating an increase in systemwide congestion (Table 2-2, Final EIS).

The Managed Lane Alternative would not have supported planned concentrated future population and employment growth because it would not have provided concentrations of transit service that would have served as a nucleus for transit-oriented development. The Managed Lane Alternative would have provided little transit benefit at a high cost. The cost-per-hour of transit-user benefits for the Managed Lane Alternative would have been two to three times higher than that for the Fixed Guideway Alternative. Similar to the Transportation System Management (TSM) Alternative, the Managed Lane Alternative would not have had substantially improved service or access to transit for transit-dependent communities. No funding sources were identified for the Managed Lane Alternative. Toll revenues from the Managed Lanes Alternative would have paid for ongoing operations and maintenance while remaining revenues would have been used to repay debt incurred to construct the system.

The Managed Lane Alternative would have generated the greatest amount of air pollution, required the greatest amount of energy for transportation use, and would have resulted in the largest number of transportation noise impacts of all the alternatives evaluated. Alternatively, because the Managed Lane Alternative would have served a shorter portion of the study corridor, it would have resulted in fewer displacements and would have affected fewer archaeological, cultural, and historic resources than the Fixed Guideway Alternative. The Managed Lane Alternative would not have affected any farmlands. Visually, the elevated structure would have extended a shorter distance, but it would have been more visually intrusive because its elevated structure, with a typical width of between 36 and 46 feet, would have been much wider than the Fixed Guideway Alternative.

After the Alternatives Analysis phase was completed, several scoping comments were received requesting reconsideration of the Managed Lane Alternative that was considered and rejected during the Alternatives Analysis process. However, because no new information was provided that would have changed the findings of the Alternatives Analysis regarding the Managed Lane Alternative, it was not included in the Draft EIS for further consideration.

In addition, the TSM Alternative studied during the Alternatives Analysis increased bus service. The alternative included express bus service that operated as bus rapid transit in existing facilities. Bus frequencies would have been increased during peak periods to improve service for work-related trips, particularly from developing areas. The bus fleet was assumed to increase from 525 to 765 buses, and park-and-ride lots were assumed at West Kapolei, UH West Oahu, Waipio, and Aloha Stadium. The TSM Alternative would have improved transit travel times, but it would have done little to improve corridor mobility and travel reliability. Roadway congestion also would not have been alleviated.

After review of the Alternatives Analysis Report and consideration of public comments, the City Council selected a fixed guideway transit system extending from Kapolei to UH Manoa with a connection to Waikiki as the Locally Preferred Alternative. The selection, which eliminated the TSM and Managed Lane Alternatives, became Ordinance 07-001 on January 6, 2007. The NEPA Notice of Intent and Scoping Information Package for the EIS included the No Build Alternative and two Build Alternatives (a Fixed Guideway Transit Alternative via Salt Lake Boulevard and a Fixed Guideway Transit Alternative via the Airport & Salt Lake Boulevard). Accordingly, the Managed Lane and TSM Alternatives were not included in the EIS.

The conditions between Phoenix and Honolulu are different. The systems are both 20 miles long, but the Phoenix line is estimated to carry less than half the riders of the Honolulu system and take more than twice as long to travel the 20 miles. Moreover, the Phoenix line removes two lanes of traffic along most of the route. There are numerous alternative routes available for motorists in the Phoenix metro area. The Project in Honolulu will not remove any travel lanes. It will add to the capacity of the overall transportation system without reducing the existing, limited roadway supply. Phoenix did not need to preserve highway capacity; Honolulu must do so. To accomplish that, the system must be elevated (underground is more expensive). The cost of an elevated system is higher than an at-grade line such as the recently opened system in Phoenix, but the Honolulu system will have a much higher capacity and will be more reliable. In addition, the Phoenix metropolitan area, for example, has much lower population density than Honolulu, and a very small portion of the population will be served by the first rail line, which was opened recently. Grade-separated transit systems operate worldwide, including many in the United States, such as BART in the San Francisco Bay Area, MARTA in Atlanta, and the Washington Metro. These three systems each include elevated sections.

The effectiveness of rail transit is closely linked to the population density of the area served. As described in Chapter 1 of the Final EIS, the majority of the population on Oahu is located in a narrow corridor, which makes it ideal to support rail transit. The corridor from Kapolei to UH Manoa (i.e., the study corridor) is well suited for the fixed guideway project. In 2000, 63 percent of Oahu's population of 876,200 and 80 percent of its 501,100 jobs were located within the study corridor. By 2030, these percentages will increase to 69 percent of the population and 83 percent of the employment as development continues to be concentrated into the Primary Urban Corridor and Ewa Development Plan areas. As stated in Section 1.3.1 of the Final EIS, 2,036,000, or 73 percent, of the approximately 2,790,000 islandwide daily trips, and 350,000, or 64 percent, of the 544,000 a.m. peak-period work-related trips are currently generated within the study corridor. The study corridor attracts an even higher percentage of

islandwide work-related trips with 446,000, or 82 percent, of a.m. peak-period work-related trips having destinations within the study corridor.

Figure 3-7 in the Final EIS shows 2030 travel times between selected travel markets with and without the Project. This information represents the time required to complete a trip from origin to destination and assumes that at least a portion of the trip will be made on the fixed guideway system. As shown in Figure 3-7, travel times will improve significantly (up to a 60 percent travel time savings) with the Project as compared to the No Build Alternative. The largest improvement in travel-time savings occurs for trips from Kapolei to Pearl Harbor. Even trips to and from Mililani and Waikiki, which are not along the project alignment, will benefit from reduced travel times when using the guideway. These decreases in travel times are anticipated to attract motorists out of their cars. There will also be coordinated transfers between the fixed guideway system and the bus, which will minimize wait times. Forecasts indicate that riders who are predicted to use the train are those who will find it is more beneficial than another transportation alternative. Some fixed guideway riders are those who currently use TheBus, but many will be from other modes. Forecasts indicate that approximately 40,000 vehicles will be removed from roadways as a result of the Project. Most guideway systems are attractive to automobile users because of the time benefit and the lower stress levels during the ride.

As identified in Section 3.2.1 of the Final EIS, transit ridership forecasts for rail and bus service are based on a travel demand forecasting model used by the Oahu Metropolitan Transportation Organization (OahuMPO) for the Oahu Regional Transportation Plan. The OahuMPO model is based on "best practices" for urban travel models in the U.S. The model is updated approximately every five years to reflect changes in land use, socio-economic conditions, and transportation network improvements. The model is approved by the OahuMPO Technical Advisory Committee. As indicated in the Final EIS, this modeling approach has proven to be effective in estimating ridership levels in other areas such as Los Angeles County, Salt Lake City, and the Denver region in the last 10 years. This model is based on guidelines established by the FTA. The travel demand forecasting model has been refined since the Draft EIS was published to account for non-home-based direct-demand trips (trips that do not originate or end at home) during off-peak periods. In addition, the air passenger model (which forecasts travel in the corridor related to passengers arriving or departing at Honolulu International Airport) was updated to reflect current conditions. The Final EIS reflects updated ridership numbers resulting from model refinement. Lastly, an at-grade light rail system must stop and accelerate at signalized intersections and, accordingly, the at-grade system is marginally less energy-efficient than an elevated system.

The Draft and Final EISs were prepared by an independent planning and engineering consulting company selected based on company qualifications. The company will not be a construction contractor on the Project. As stated in the Preface to the Draft EIS, the purpose of the EIS is to provide DTS, the FTA, and the public and interested parties with the information necessary to make an informed decision based on a full and open analysis of costs, benefits, and environmental impacts of the alternatives considered. Chapter 4 of the Final EIS presents the environmental effects of the Project, including aesthetic effects in Section 4.8. General Excise and Use Tax (GET) surcharge revenue and FTA New Starts funds are anticipated to cover project construction costs. In comparison to the No Build Alternative, in 2030 the Project

will reduce congestion by 18 percent, as measured by daily vehicle hours of delay, as shown in Table 3-14 in the Final EIS. The Project is not related to the Super Ferry, or any findings of that evaluation.

The island's unique visual character and scenic beauty were considered in the visual and aesthetic analysis presented in the Draft and Final EISs. The Project will be set in an urban context where visual change is expected and differences in scales of structures are typical. The visual effects on Honolulu's Primary Urban Center are discussed under the "Kalihi to Ala Moana Center Landscape Unit" heading in Section 4.8.3 of the Final EIS. This includes visual effects along Dillingham Boulevard and Halekauwila Street, and at Chinatown, Aloha Tower, and Irwin Park.

The following measures will be included with the Project to minimize negative visual effects and enhance the visual and aesthetic opportunities that it creates:

- *Develop and apply design guidelines that will establish a consistent design framework for the Project with consideration of local context.*
- *Coordinate the project design with the City's transit-oriented development program within the Department of Planning and Permitting.*
- *Consult with the communities surrounding each station for input on station design elements.*
- *Consider specific sites for landscaping and trees during Final Design when plans for new plantings will be prepared by a landscape architect. Landscape and streetscape improvements will mitigate potential visual impacts.*

The Project will also provide users, including tourists, with expansive views from several portions of the corridor by elevating riders above highway traffic, street trees, and low structures adjacent to the alignment. In Section 4.8.3 of the Final EIS, specific environmental, architectural, and landscape design criteria are listed that will help minimize visual effects of the Project.

As discussed in Section 4.10.3 of the Final EIS, the Project will include an integrated noise blocking parapet wall at the edge of the guideway structure that extends three feet above the top of the rail and a system specification for vehicles with wheel skirts. The parapet wall will substantially reduce ground-level noise. Wheel skirts will increase the benefit of the parapet wall at locations above the elevation of the track. Measures to reduce noise levels above the track elevation, such as sound-absorptive materials in the track area, will be evaluated during Preliminary Engineering for the Project. Once the Project is operating, noise levels will be measured to determine the actual extent of project noise impacts. There are no severely impacted areas in the corridor.

In addition, your observations regarding New York City are noted.

Your letter contained several points about the possibility of using funds dedicated through the GET surcharge for other needs. However, the enabling legislation for the GET

surcharge precludes the use of the collected funds for these purposes. GET surcharge revenue and FTA New Starts funds are anticipated to cover project construction costs.

Street trees along the Project alignment are discussed in Section 4.15 of the Final EIS. Twenty-eight Notable true kamani trees on the makai side of Dillingham Boulevard will be removed. As stated in your letter, trees on the makai side of the street are already periodically pruned because of the presence of utilities. Trees on the mauka side of Dillingham Boulevard are not pruned and will be preserved. The State Historic Preservation Division has determined that some trees on Dillingham Boulevard are eligible for the historic register. The Project will not affect any trees on Kapiolani Boulevard. Affects to street trees will be mitigated by transplanting existing trees or planting new ones, where possible. Trees suitable for transplanting that are displaced by construction will be relocated to the City and County project nursery until they can be transplanted to another part of the project area. The City will coordinate with the Hawaii Department of Transportation's highway landscape architect. The location where street trees will be transplanted will be selected based on project-specific criteria that could include the following:

- *Areas where existing landscaping will be lost along the corridor*
- *Areas where opportunities exist for enhancing existing streetscapes near the study corridor*
- *Areas where stations and parking lots will be constructed*
- *Areas where shared benefits will be accomplished, such as areas adjacent to parks or historic sites*

In addition to transplanting existing trees, plans for new plantings will be prepared by a landscape architect during Final Design to further mitigate effects to street trees. To mitigate any substantial effects in areas that require tree removal, special attention will be given to the development of landscaping plans so that new plantings will provide similar advantages to the community. If new plantings will not offer equitable mitigation (e.g., older mature trees that are removed), additional younger trees could be planted that will, in time, develop similar benefits. As stated in the mitigation discussion, existing trees will be retained where practical. This includes station areas.

Regarding the homeless, Section 4.6.3 of the Final EIS describes potential safety and security issues once the Project is operating. The discussion notes that to reduce the potential for crime, the FTA requires the development and implementation of a Safety and Security Management Plan (SSMP) for new fixed guideway projects (49 CMR 633). The SSMP will address the technical and management strategies for analyzing safety or determining security risks throughout the Project's life cycle.

To address your concerns about relocations and acquisitions, where relocations will occur, compensation will be provided to affected property owners, businesses, or residents in compliance with all applicable Federal and State laws and will follow the Federal Uniform Relocation Assistance and Real Property Acquisition Policies Act. Actions to be undertaken include the following:

- *The City will assist all affected persons in locating suitable replacement housing and business sites within an individual's or business's financial means.*

- *A minimum 90-day written notice will be provided before any business or resident will be required to move.*

As stated in Section 4.4 of the Final EIS, relocation services will be provided to all affected business and residential property owners and tenants without discrimination; and persons, businesses, or organizations that are displaced as a result of the Project will be treated fairly and equitably.

The Project has logical termini at East Kapolei and Ala Moana Center and independent utility from any extensions that may be constructed in the future. The proposed future extensions to West Kapolei, Salt Lake Boulevard, Waikiki, and UH Manoa are discussed in the cumulative impacts sections of Chapters 3 and 4 of the Final EIS. The future extensions are not part of this Project; thus, they are not required to be evaluated under Chapter 343 of the Hawaii Revised Statutes and NEPA. Under NEPA, environmental analysis is only required when there is a proposed action by a Federal agency. Here, because the future extensions are not proposed for implementation at this time, they are not part of the Project studied in the Final EIS. It would be premature to undertake an environmental analysis of the extensions (beyond the cumulative impacts analysis) because they are not part of the proposed action to be taken by the City and FTA. If the future extensions are proposed for implementation in the future, environmental analysis of the extensions and appropriate alternatives will be undertaken at that time.

The City will not begin construction on the Project until completion of the Federal Record of Decision and acceptance of the Hawaii Revised Statutes Chapter 343 Final EIS.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
Creation Date :	1/22/2009
Creator Affiliation :	
First Name :	Kirk
Last Name :	Paterson
Business/Organization :	Allstate Insurance
Address :	1259 S. Beretania St., Ste 1
Alternative Preference :	
Apt./Suite No. :	
City :	Honolulu
State :	HI
Zip Code :	96814
Email :	
Telephone :	
Telephone Extension :	
Add to Mailing List :	None
Submission Method :	Website
Other Submission Method :	
Submission Date :	01/22/2009
Submission Content/Notes :	Of the two proposed alignments, the Airport Alignment seems the most logical to me. Go Rail Go!

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, 3RD FLOOR
HONOLULU, HAWAII 96813
Phone: (808) 768-8305 • Fax: (808) 768-4730 • Internet: www.honolulu.gov

MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-334263

Mr. Kirk Paterson
1259 South Beretania Street, Suite 1
Honolulu, Hawaii 96814

Dear Mr. Paterson:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraph addresses your comments regarding the above-referenced submittal:

Your preference for the Airport Alternative has been noted. While each of the alternatives discussed in the Draft EIS includes trade-offs between benefits and impacts, the Airport Alternative from East Kapolei to Ala Moana has been selected as the Preferred Alternative as described above. As compared to the alternatives discussed in the Draft EIS, the Airport Alternative will carry the most passengers, provide the greatest transit-user benefits, and result in the fewest vehicle hours of delay. It will provide access to employment centers at Pearl Harbor Naval Base and Honolulu International Airport and will serve the Salt Lake neighborhood with connecting bus service. Of the three Build Alternatives addressed in the Draft EIS, the Airport Alternative will have slightly less impacts to the natural and built environment analyzed in the Draft EIS. During the public comment period on the Draft EIS, the public overwhelmingly supported the Airport Alternative. Of the comments that specifically supported one of the alternatives, more than 75 percent were in support of the Airport Alternative. For more

information this selection is discussed in Section 2.4 of the Final EIS. Since publication of the Draft EIS, design has been advanced, further analysis has been completed, and information has been added in response to comments on the Draft EIS and agency coordination. The Final EIS discusses the process that was used to select the Preferred Alternative, how comments were considered in the decision-making process, impacts and mitigation commitments.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
Creation Date :	1/28/2009
Creator Affiliation :	
First Name :	Lance
Last Name :	Pazaglia
Business/Organization :	None
Address :	445 Seaside Avenue
Alternative Preference :	
Apt./Suite No. :	4301
City :	Honolulu
State :	HI
Zip Code :	96815
Email :	lepforunme2@yahoo.com
Telephone :	
Telephone Extension :	
Add to Mailing List :	Email
Submission Method :	Website
Other Submission Method :	
Submission Date :	01/28/2009
Submission Content/Notes :	I think your project is a great idea. Don't let the naysayers bring you down on the project. It is the best idea ever for Oahu. Keep me informed for support

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

May 21, 2010

RT9/09-334337

Mr. Lance Pazaglia
445 Seaside Avenue, #4301
Honolulu, Hawaii 96815

Dear Mr. Pazaglia:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraph addresses comments regarding the above-referenced submittal:

Your preference for a Fixed Guideway Transit Alternative has been noted. While each of the alternatives includes trade-offs between benefits and impacts, the Airport Alternative from East Kapolei to Ala Moana Center has been selected as the Preferred Alternative. The identification of the Airport Alternative as the Preferred Alternative was made by the City to comply with FTA's NEPA regulations that state that the Final EIS should focus on the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative, public input on the Draft EIS, and City Council Resolution 08-261 identifying the Airport Alternative as the Project. The selection of the Airport Alternative is described in Chapter 2 of this Final EIS. The discussion of the alternatives considered is included in Chapter 2 of this Final EIS and the Alternatives Analysis. As discussed in Section 3.4.2 of this Final EIS, the Airport Alternative will carry the most passengers with 116,000 daily passengers and 282,500 daily trips in 2030, thereby resulting in the greatest transit-user benefits. The

Airport Alternative will also result in the fewest vehicle miles traveled and vehicle hours of delay, as well as provide access to major employment areas, including Honolulu International Airport, that will have substantially greater ridership than the other alternatives considered.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Issuance of the Record of Decision under NEPA and acceptance of the Final EIS by the Governor of the State of Hawaii are the next anticipated actions and will conclude the environmental review process for this Project.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

From: Ted.Matley@dot.gov [mailto:Ted.Matley@dot.gov]
Sent: Thursday, January 22, 2009 1:41 PM
To: Miyamoto, Faith
Subject: FW: Rail project

From: BPear26848@aol.com [mailto:BPear26848@aol.com]
Sent: Thursday, December 18, 2008 10:51 AM
To: Matley, Ted <FTA>
Cc: governorlingle@hawaii.gov
Subject: Rail project

Just another voice raised in protest against this fiscally irresponsible project, not to mention the untold misery it will cause to the people along the route and the urban blight.

Bryan Pearson
Kane'ohe. HI.

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT12/08-292245R

Mr. Bryan Pearson
bpear26848@aol.com

Dear Mr. Pearson:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraph addresses your comments regarding the above-referenced submittal:

Your comments have been noted. The capital plan for the Project is presented in Section 6.3 of the Final EIS, including a description of the amount of funding anticipated from various sources. Section 6.6 of the Final EIS describes risks and uncertainties associated with these funding assumptions. The effects of the Project are discussed in Chapters 3 and 4 of the Final EIS.

The FTA and DTS appreciate your interest in the Project. The Final EIS has been issued in conjunction with the distribution of this letter. You may view the Final EIS on the Project website at www.honolulutransit.org. You may request a DVD of the Final EIS and additional content through the "Contact Us" tab on the website or by calling the Project hotline at 566-2299. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

4350 Halupa Street
Honolulu, Hawaii 96818
January 6, 2009

Mr Wayne Yoshioka
Director Department of Transportation Services
City and County of Honolulu
650 South King St 3rd Floor
Honolulu, HI 96813

Dear Mr Yoshioka:

Regarding the heavy rail DEIS report; does it adequately address the issue of rail's visual impact on our environment and the affect it will have on our city's number one industry, tourism? Changing our image from an island paradise into one contaminated by urban blight, noise, and fumes will surely have unacknowledged consequences on tourism, and nowhere in your report are they addressed.

My sister-in-law who lives just South of Chicago was aghast with the proposed project. She said tourists came to our beautiful island to get away from the fumes and noise of the big city. She asked me, "Why would they destroy paradise?" Why, indeed?

Obscuring Aloha Tower, the shoreline and mountain views will forever change Oahu's unique "Sense of Place?" The report slides over the issue by stating, "Mitigation issues would focus on preserving visual resources and enhancing the project design to comply with applicable policies. The following measures would be included to minimize visual affects and enhance the visual and aesthetic opportunities it creates." Can the nebulous suggested measures, such as trees and lighting, truly preserve our visual resources?

In a Star-Bulletin 12/14/08 letter to the editor the writer discussed his experience with a steel-on-steel rail system in Sydney, Australia, and it was not positive. He wrote of "car walls marred with graffiti and windows etched with the same....sides of the tracks were littered and the squealing of the rails was irritating." What impact will the day-in day-out monotony of squealing wheel noise have on school children at schools and homeowners who live along the route?

Besides the onerous impact of heavy rail on the Island's visual environment, other issues require clarification. Why were other cheaper more environmentally friendly options not *seriously* considered? How can the expenditure of billions of dollars be justified for only a 1% improvement in traffic congestion? Why has the UH West Oahu campus not been a priority when it is evident that traffic congestion is mitigated when UH Manoa is not in session? What emergency procedures will be in place during another Island wide blackout? How would passengers be rescued? Why should the public trust steel wheels on steel rail would not rust in our salt laden air when Aloha Stadium exemplifies the opposite?

Does the Federal Transportation Administration know the electorate was swayed into passing (barely) a Charter amendment for rail because the City and County of Honolulu unethically spent over $3 million of taxpayer funds promoting it? Do they

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know the City unequivocally assured voters nearly one billion dollars from the FTA was promised without such evidence in writing? Is the FTA aware that politics caused a logical Airport, Shipyard, Pearl Harbor, and Hickam route to be bypassed in favor of the illogical Salt Lake Blvd route?

One can only hope that City leaders and other locals with a financial stake in the outcome will step back and take another look at the impact this massive project will have on our beautiful Island home and ask themselves, "In the end, will we be happy and proud of our legacy?"

Sincerely,

Janice Pechauer

Cc: Governor Linda Lingle
City Council Members
Mr Ted Matley, FTA Region IX

DEPARTMENT OF TRANSPORTATION SERVICES

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-334569

Ms. Janice Pechauer
4350 Halupa Street
Honolulu, Hawaii 96818

Dear Ms. Pechauer:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

With the Airport Alternative, visitors and residents will benefit by having more transportation options. Table 3-13 in the Final EIS shows daily person transit trips by purpose, broken down for residents and visitors. As seen in this table, transit trips for both groups increase with the addition of the Project compared to the No Build Alternative. Daily resident person trips by transit increase 24 percent with the Project compared to without, while daily visitor person trips by transit increase 19 percent with the Project compared to without the Project in 2030. As stated in Section 3.4.2 of the Final EIS, approximately 9,900 visitors are expected to use the system daily, of which 1,800 are to or from the airport.

Your comment is noted. The island's unique visual character and scenic beauty were considered in the visual and aesthetic analysis presented in the Draft and Final EISs. The Project will be set in an urban context where visual change is expected and differences in scales of structures are typical. The assessment of visual effect due to the Project as described in Section 4.8.3 of the Final EIS considers changes to the visual landscape and viewer responses to those changes. This includes the existing development along the Project alignment. Within

the Project corridor the environment changes from rural at the Wai'anae end of the corridor to dense high-rise development at the Koko Head end.

As part of the design process, the City has developed design principles, which are identified in the Honolulu High-Capacity Transit Corridor Project Compendium of Design Criteria (RTD 2009m) that will be implemented in final design to minimize visual effects of the Project. For example, guideway materials and surface textures will be selected in accordance with generally accepted architectural principles to achieve effective integration between the guideway and its surrounding environment. Landscape and streetscape improvements will mitigate potential visual impacts, primarily for street-level views.

Other measures to address visual impacts of the Project are being developed through the station design and planning process. The initial station area plans and design guidelines were first developed with coordination between DTS and the Department of Planning and Permitting (DPP). The next level of transit station design focuses on integrating individual neighborhood characteristics of the communities served by the stations.

The following mitigation framework will be included in the Project to minimize negative visual effects and enhance the visual and aesthetic opportunities that it creates:

- *Develop and apply design guidelines that will establish a consistent design framework for the Project with consideration of local context.*

- *Coordinate the project design with City TOD planning and DPP.*

- *Consult with the communities surrounding each station for input on station design elements.*

- *Consider specific sites for landscaping and trees during the final design phase when plans for new plantings will be prepared by a landscape architect. Landscape and streetscape improvements will serve to mitigate potential visual impacts.*

Section 4.8.3 of the Final EIS, Design Principles and Mitigation includes information related to the mitigation framework described above. Specifically architecture and landscape design criteria include guidelines regarding site design, materials and finishes, and lighting, which apply to stations, station areas, and the guideway.

As discussed in Section 4.10.3 of the Final EIS, the Project will not result in any noise impacts to schools or residences.

The Alternatives Analysis phase evaluated a range of transit mode and general alignment alternatives in terms of their costs, benefits, and impacts. An initial screening process considered alternatives identified through previous transit studies, a field review of the study corridor, an analysis of current population and employment data for the study corridor, a literature review of technology modes, work completed for the Oahu Regional Transportation Plan 2030 (ORTP) prepared by the Oahu Metropolitan Planning Organization (OahuMPO) (OahuMPO 2007), and public and agency comments received during the formal Alternatives Analysis scoping process.

During the fall of 2005 and winter of 2006, the City and County of Honolulu (City) completed the alternatives screening process that is documented in the Honolulu High-Capacity

Transit Corridor Project Alternatives Screening Memorandum (DTS 2006a). Scoping meetings were held and included a presentation of alternatives to the public and interested agencies and officials in which they could provide comments on the Purpose and Need, alternatives, and scope of the Alternatives Analysis. Refinements were made to the alternatives based on this input. In total, 75 fixed guideway alignment options were screened.

The following alternatives were studied in the Alternatives Analysis: No Build Alternative, Transportation System Management (TSM) Alternative, Managed Lane Alternative, and the Fixed Guideway Alternative. After review of the Alternatives Analysis Report and consideration of public comments, the City Council selected a fixed guideway transit system extending from Kapolei to UH Manoa with a connection to Waikiki as the Locally Preferred Alternative. The selection, which eliminated the TSM and Managed Lane Alternatives, became Ordinance 07-001 on January 6, 2007. The fixed guideway system is the most cost-effective system of all the alternatives studied. Less expensive options would not have improved system performance.

The one percent referenced is an islandwide figure that includes all travel during the day, including short trips in neighborhoods and trips in the North Shore, Kaneohe, or Hawaii Kai, which are not directly served by the Project. The most visible benefits of transit are within a corridor and during the peak travel times of the day. Table 3-12 shows daily islandwide trips, while Figure 3-11 in the Final EIS shows transit shares of home-based work trips during the a.m. two-hour peak period for key travel markets. As shown in Table 3-12, on a daily, islandwide basis, transit use is not expected to increase substantially. However, as shown in Figure 3-11, there is a substantial increase in transit trips during the a.m. peak period within the study corridor because of the Project. As stated in Section 3.4.2 of the Final EIS, for many travel markets, the transit share for trips under the Project would double or triple the share occurring under the No Build Alternative. For example, the commute-to-work transit share of the Kapolei to Downtown Honolulu travel market would increase from 23 percent under the No Build Alternative to 60 percent under the Project. In other words, more than half of the people going from Kapolei to Downtown for work in the morning would use transit with the Project, compared to only a quarter without the Project. Congestion, as measured in vehicle miles of delay, will decrease 18 percent with the Project compared to the No Build Alternative.

The fixed guideway station at the UH West Oahu campus will be part of the first construction phase of the Project. The Project has logical termini at East Kapolei and Ala Moana Center and independent utility from any extensions that may be constructed in the future. The proposed future extensions to West Kapolei, Salt Lake Boulevard, Waikiki, and UH Manoa are discussed in the cumulative impacts sections of Chapters 3 and 4 of the Final EIS. The future extensions are not part of this Project; thus, they are not required to be evaluated under Chapter 343 of the Hawaii Revised Statutes and NEPA. Under NEPA, environmental analysis is only required when there is a proposed action by a Federal agency. Here, because the future extensions are not proposed for implementation at this time, they are not part of the Project studied in the Final EIS. It would be premature to undertake an environmental analysis of the extensions (beyond the cumulative impacts analysis) because they are not part of the proposed action to be taken by the City and FTA. If the future extensions are proposed for implementation in the future, environmental analysis of the extensions and appropriate alternatives will be undertaken at that time. Bus service will be enhanced between Ala Moana Center and UH Manoa until a future extension is built.

Regarding your questions about emergency procedures, since trains and rail stations will be electrically powered, the system's infrastructure is being designed to handle service

disruptions. For example, trains will draw power from many points along the route, so an outage in a few areas should not disrupt service to the remaining route overall. If electrical power is lost systemwide, then train brakes are designed to stop the rail cars even without power. Lights will stay on in trains and stations; backup batteries will provide lighting for several hours. The train operations center will communicate with passengers via the public address system and intercom to provide guidance. If power is restored within a short time, service will resume. With a prolonged outage, the operations center will direct passengers to exit the trains and walk along a lighted emergency walkway on the guideway to the nearest station. For those unable to exit rail cars, help will be provided by emergency responders and transit staff. Passengers will be met at the train station by a coordinated response from emergency responders and City transportation workers.

To respond to your questions about corrosion, control measures will be applied to the Project's fixed steel facilities and neighboring utility structures to provide proper operation over their lifetime. These measures include the following:

1. *Protective coating specification for steel aerial structures*
2. *Coating specification for stations*
3. *Preventive measures against stray current corrosion*
4. *Corrosion-control design of transit underground utilities and neighboring utilities owned by others*

Lastly, the FTA has been apprised of the Project's development throughout the process and has met periodically to discuss project issues in terms of design and community concerns. The FTA is aware of the Project's public involvement plan and actions. The FTA is also aware of Council resolutions passed throughout the course of this Project, including its resolution to select the Airport Alignment. However, although these resolutions are passed by the City, they are not binding on the NEPA process or the decision by the FTA on a proposed action, per the requirements of NEPA policy.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
Creation Date :	12/20/2008
Creator Affiliation :	
First Name :	Robert
Last Name :	Pereira
Business/Organization :	Midas Auto Service
Address :	94-709 Farrington Hwy
Alternative Preference :	
Apt./Suite No. :	B
City :	Waipahu
State :	HI
Zip Code :	96797
Email :	bob@midashawaii.com
Telephone :	
Telephone Extension :	
Add to Mailing List :	Both
Submission Method :	Website
Other Submission Method :	
Submission Date :	12/20/2008
Submission Content/Notes :	It looks like you plan to use a portion of the property at 1415 Dillingham Blvd. for the project. Can you tell me how you will use the property and how it will affect my business at that location?

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, 3RD FLOOR
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Phone: (808) 768-8305 • Fax: (808) 768-4730 • Internet: www.honolulu.gov

MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-332250

Mr. Robert Pereira
94-709 Farrington Highway
Apartment B
Waipahu, Hawaii 96797

Dear Mr. Pereira:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraph addresses your comments regarding the above-referenced submittal:

Dillingham Boulevard near Waiakamilo Road will require widening to the makai side. Additional right-of-way will be required to relocate the sidewalk farther makai and allow for the widening. You can find right-of-way maps in Appendix C of the Final EIS. All owners of properties where an acquisition is required have been individually contacted to discuss right-of-way impacts to their respective property. As design progresses, there will be a refinement of property requirements.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Status :	Initial Action Needed
Creation Date :	12/6/2008
Creator Affiliation :	
First Name :	Tom
Last Name :	Pickard
Business/Organization :	
Address :	
Alternative Preference :	
Apt./Suite No. :	
City :	
State :	HI
Zip Code :	96731
Email :	pickardt001@hawaii.rr.com
Telephone :	
Telephone Extension :	
Add to Mailing List :	Email
Submission Method :	Website
Other Submission Method :	
Submission Date :	12/06/2008
Submission Content/Notes :	I am totally for the rail system.

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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Phone: (808) 768-8305 • Fax: (808) 768-4730 • Internet: www.honolulu.gov

MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010 RT9/09-331295

Mr. Tom Pickard
pickardt001@hawaii.rr.com

Dear Mr. Pickard:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall indentify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraph addresses your comments regarding the above-referenced submittal:

Your preference for a Fixed Guideway Transit Alternative has been noted. While each of the alternatives discussed in the Draft EIS includes trade-offs between benefits and impacts, the Airport Alternative from East Kapolei to Ala Moana has been selected as the Preferred Alternative as described above. As compared to the alternatives discussed in the Draft EIS, the Airport Alternative will carry the most passengers, provide the greatest transit-user benefits, and result in the fewest vehicle hours of delay. It will provide access to employment centers at Pearl Harbor Naval Base and Honolulu International Airport and will serve the Salt Lake neighborhood with connecting bus service. Of the three Build Alternatives addressed in the Draft EIS, the Airport Alternative will have slightly less impacts to the natural and built environment analyzed in the Draft EIS. During the public comment period on the Draft EIS, the public overwhelmingly supported the Airport Alternative. Of the comments that specifically supported one of the alternatives, more than 75 percent were in support of the Airport Alternative. For more information this selection is discussed in Section 2.4 of the Final EIS. Since publication of the

Draft EIS, design has been advanced, further analysis has been completed, and information has been added in response to comments on the Draft EIS and agency coordination. The Final EIS discusses the process that was used to select the Preferred Alternative, how comments were considered in the decision-making process, impacts and mitigation commitments.

The FTA and DTS appreciate your interest in the Project. The Final EIS has been issued in conjunction with the distribution of this letter. You may view the Final EIS on the Project website at www.honolulutransit.org. You may request a DVD of the Final EIS and additional content through the "Contact Us" tab on the website or by calling the Project hotline at 566-2299. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

24465

Honolulu Hale
530 S. King Street
Honolulu, HI 96813

'09 JAN 12 A8:32

DIRECTOR OF BUDGET
FISCAL SERVICES
C&C OF HONOLULU

1039 Luapele Drive
Honolulu, HI
December 11, 2008

Dear Mayor Mufi Hanneman,

My mom, dad, and I waste a lot of time going to places across the island such as Ewa Beach and Hawaii Kai for parties and get-togethers because of traffic. The roads will probably be more congested in the future, and that will eat up even more of our time. My parents sometimes don't want to pick me up from school because of the traffic, and I'm left finding my own ways of transportation home. If a rail transit were built, I would have a new way to get home and my family and I would save loads of time.

Although this rail transit may benefit me, I feel that it won't benefit everyone else. The cost of making this rail transit, 3.7 billion dollars, is way too expensive. We are already in a recession. I don't want our economy to be in even worse shape just because we are worried about too much traffic on our roads.

Worst of all, I feel that the transit will be more harmful than beneficial, too. After looking up how the rail will affect the environment, I found that it would actually take up more energy and release more emissions than the number of cars the rail is meant to replace! I know that it has already been approved to be built sometime in the future, but please, if you may, keep Hawaii's beautiful environment first on your mind while constructing it.

Sincerely,

Bryan Pineda

Bryan Pineda

Fr: Bryan Pineda
1039 Luapele Dr.
Honolulu, HI 96818

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, 3RD FLOOR
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Phone: (808) 768-8305 • Fax: (808) 768-4730 • Internet: www.honolulu.gov

MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT1/09-295154R

Mr. Bryan Pineda
1039 Luapele Drive
Honolulu, Hawaii 96818

Dear Mr. Pineda:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

As shown in Chapter 3 of the Final EIS, roadway congestion (as measured in terms of vehicle hours of delay) will decrease 18 percent with the Project compared to No Build conditions. In addition, as shown in Figure 3-7, there will be significant improvements in transit travel time. The fixed guideway system will provide an additional mode of travel.

Chapter 6 of the Final EIS describes the financial resources anticipated to be needed to pay for the capital cost of the Project and for ongoing operating and maintenance costs. Capital costs of the Project, including finance charges, are expected to be fully paid for by a combination of FTA Section 5307 and FTA Section 5309 New Starts Funds from the Federal government and revenues from the County General Excise and Use Tax Surcharge levied from 2007 through 2022 on Oahu. Chapter 6 in the Final EIS reflects the latest information on the economy in both cost and revenue forecasts.

In addition, the construction of the Project is anticipated to provide employment opportunities. An average of about 10,000 per yearof construction jobs will be created in building the project as noted in Section 4.18 of the Final EIS.

Traffic congestion is wasteful in terms of resources and time. In the long run, the inability to move efficiently because of traffic congestion could have a substantially detrimental impact on economic activity within the Honolulu area. The Rail project will offer another option to maintain mobility.

Comment noted. Section 4.9.3 of the Final EIS states that the Project is predicted to demonstrate a four percent reduction in vehicle miles traveled and no change in overall network speed compared to the No Build Alternative. This will result in predicted pollution reductions ranging from 3.9 to 4.6 percent compared to the No Build Alternative. As stated in Section 4.11.3, the total transportation energy demand for transit and highway vehicles will be lower than for the No Build Alternative. Table 4-21 summarizes the anticipated average daily transportation demand in 2030 for the Project. The Project is anticipated to reduce daily transportation energy demand by approximately 3 percent compared to the No Build Alternative.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
Creation Date :	12/19/2008
Creator Affiliation :	
First Name :	george
Last Name :	plechaty
Business/Organization :	
Address :	1380 Lusitana St.
Alternative Preference :	
Apt./Suite No. :	
City :	Honolulu,
State :	HI
Zip Code :	96816
Email :	georgepechaty@aol.com
Telephone :	
Telephone Extension :	
Add to Mailing List :	Both
Submission Method :	Website
Other Submission Method :	
Submission Date :	12/19/2008
Submission Content/Notes :	Rail is needed ASAP. Long overdue. Airport stop is a no brainer.

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/090-332019

Mr. George Plechaty
1380 Lusitana Street
Honolulu, Hawaii 96816

Dear Mr. Plechaty:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraph addresses your comments regarding the above-referenced submittal:

Your preference for the Airport Alternative has been noted. While each of the alternatives discussed in the Draft EIS includes trade-offs between benefits and impacts, the Airport Alternative from East Kapolei to Ala Moana has been selected as the Preferred Alternative as described above. As compared to the alternatives discussed in the Draft EIS, the Airport Alternative will carry the most passengers, provide the greatest transit-user benefits, and result in the fewest vehicle hours of delay. It will provide access to employment centers at Pearl Harbor Naval Base and Honolulu International Airport and will serve the Salt Lake neighborhood with connecting bus service. Of the three Build Alternatives addressed in the Draft EIS, the Airport Alternative will have slightly less impacts to the natural and built environment analyzed in the Draft EIS. During the public comment period on the Draft EIS, the public overwhelmingly supported the Airport Alternative. Of the comments that specifically supported one of the alternatives, more than 75 percent were in support of the Airport Alternative. For more

information this selection is discussed in Section 2.4 of the Final EIS. Since publication of the Draft EIS, design has been advanced, further analysis has been completed, and information has been added in response to comments on the Draft EIS and agency coordination. The Final EIS discusses the process that was used to select the Preferred Alternative, how comments were considered in the decision-making process, impacts and mitigation commitments.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
Creation Date :	1/23/2009
Creator Affiliation :	
First Name :	Douglas
Last Name :	Pothul
Business/Organization :	
Address :	203 Akiohala Street
Alternative Preference :	
Apt./Suite No. :	
City :	Kailua
State :	HI
Zip Code :	96734
Email :	dougpothul@yahoo.com
Telephone :	808-735-7795
Telephone Extension :	
Add to Mailing List :	Both
Submission Method :	Website
Other Submission Method :	
Submission Date :	01/23/2009
Submission Content/Notes :	I would like a list of all non-residential properties that will likely be acquired by the City (or other governmental agency) to facilitate the construction and operation of this transit system. Thank you.

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, 3RD FLOOR
HONOLULU, HAWAII 96813
Phone: (808) 768-8305 • Fax: (808) 768-4730 • Internet: www.honolulu.gov

MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-334274

Mr. Douglas Pothul
203 Akiohala Street
Kailua, Hawaii 96734

Dear Mr. Pothul:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraph addresses your comments regarding the above-referenced submittal:

Appendix C of the Final EIS provides information regarding the tax map parcels (TMKs) that may be acquired by the City. The information has been updated from what was contained in Appendix B of Draft EIS.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
Creation Date :	1/7/2009
Creator Affiliation :	
First Name :	Daniel
Last Name :	Poyer
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Address :	99-545 Opukea St.
Alternative Preference :	
Apt./Suite No. :	
City :	Aiea
State :	HI
Zip Code :	96701
Email :	gsc_hawaii@yahoo.com
Telephone :	808-356-8404
Telephone Extension :	
Add to Mailing List :	Both
Submission Method :	Website
Other Submission Method :	
Submission Date :	01/07/2009
Submission Content/Notes :	Build the Rail Now and lessen the traffic

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-332981

Mr. Daniel Poyer
99-545 Opukea Street
Aiea, Hawaii 96701

Dear Mr. Poyer:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraph addresses your comments regarding the above-referenced submittal:

Your preference for a Fixed Guideway Transit Alternative has been noted. While each of the alternatives discussed in the Draft EIS includes trade-offs between benefits and impacts, the Airport Alternative from East Kapolei to Ala Moana has been selected as the Preferred Alternative as described above. As compared to the alternatives discussed in the Draft EIS, the Airport Alternative will carry the most passengers, provide the greatest transit-user benefits, and result in the fewest vehicle hours of delay. It will provide access to employment centers at Pearl Harbor Naval Base and Honolulu International Airport and will serve the Salt Lake neighborhood with connecting bus service. Of the three Build Alternatives addressed in the Draft EIS, the Airport Alternative will have slightly less impacts to the natural and built environment analyzed in the Draft EIS. During the public comment period on the Draft EIS, the public overwhelmingly supported the Airport Alternative. Of the comments that specifically supported one of the alternatives, more than 75 percent were in support of the

Airport Alternative. For more information this selection is discussed in Section 2.4 of the Final EIS. Since publication of the Draft EIS, design has been advanced, further analysis has been completed, and information has been added in response to comments on the Draft EIS and agency coordination. The Final EIS discusses the process that was used to select the Preferred Alternative, how comments were considered in the decision-making process, impacts and mitigation commitments.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
Creation Date :	12/18/2008
Creator Affiliation :	
First Name :	Ben
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Submission Date :	12/18/2008

Submission Content/Notes : 29 December, 2008

To:
Mr. Wayne Yoshioka
Director Department of Transportation Services
City and County of Honolulu
650 South King St. 3rd Floor
Honolulu
HI 96813
FAX: (808) 587-6080

Subject: Comment on Draft Environmental Impact Statement (DEIS) "Honolulu High-capacity transit corridor Project", Issue- Project Construction Phasing will not provide early traffic relief

Fact:
The rail project construction phasing is proposed in four phases as discussed on DEIS page 2-38 and as shown on Figure 2-44 as follows:

- East Kapolei to Pearl Highlands (First Construction Phase)
- Pearl Highlands to Aloha Stadium (Second Construction Phase)
- Aloha Stadium to Middle Street (Third Construction Phase)
- Middle Street to Ala Moana Shopping Center (Fourth and final Construction Phase)

Discussion:
The primary purpose of any mass transit system is to provide traffic relief and to provide relief in the near term. The major West and Central Oahu traffic bottlenecks are at the Middle Street merge and at the H-1/H2 merge. Construction phases for the rail should be prioritized to reduce the traffic bottlenecks at these two locations. Therefore, the project construction phasing shown above should be reversed:

- Middle Street to Ala Moana Shopping Center (First Construction Phase)
- Aloha Stadium to Middle Street (Second Construction Phase)
- Pearl Highlands to Aloha Stadium (Third Construction Phase)
- East Kapolei to Pearl Highlands (Fourth Construction Phase)

This revised project phasing is logical because:
a) The Middle Street to Ala Moana Shopping Center first phase will provide early traffic relief to the Middle Street bottle neck.
b) The funding source for the entire 20 mile segment is not guaranteed, recognizing that the General Excise Tax is not meeting projections in revenue due to the expected long term slumping economy. The taxpayer will not tolerate any increase in property tax or GET to fund any rail fund shortfall.
c) The funding amount from the Federal Transit Authority is not guaranteed.
d) If rail funds are delayed, providing traffic relief to the traffic bottlenecks on H-1 will be delayed.

e) Each phase for rail will provide the maximum bang for the dollar. The rail will be completely be useable and serve the most number of commuters as each phase is completed. Conversely, the Kapolei to Pearl Highlands would serve very few commuters as most commuters will be destined for east of Pearl Harbor and beyond in the easterly direction.

Vehicle Maintenance and Storage Facility for each construction phase can be temporarily established to support each construction phase as modified:
a) For the Middle Street phase, some 40 acres could be obtained along Lagoon Drive to include portions of Keehi Lagoon Park, Airport vacant areas and commercial businesses including Budget Car Rental. At least 10 acres for park and ride can be acquired in the airport area alongside Aolele Street and Lagoon Drive.
b) For the Aloha Stadium phase, portions of the Aloha Stadium Parking lot can be temporarily used for the Storage Facility and temp facilities for vehicle maintenance.
c) For the Pearl Highlands Phase, a 43-acre vacant site near Leeward Community College is available (DEIS figure 2-42).
d) A 41-acre site is identified for the Kapolei phase (DEIS figure 2-41).

Conclusion:
Construction of the Middle Street to Ala Moana Phase as a first priority is consistent with providing near-term traffic relief, will initially serve the most number of commuters, will be completely usuable and cost effective, and will not force the taxpayer to pay more taxes to fund additional rail segments should rail funding sources not achieve revenue projections.

Recommendation:
The DEIS should reverse the construction project phasing as discussed above starting with the Middle Street to Ala Moana Shopping Center as the First Phase.

Respectfully,

Ben Rameib P.E.
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96818

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June 11, 2010

RT10/09-336375

Mr. Ben Ramelb
1148 Ala Lilikoi Street
Honolulu, Hawaii 96818

Dear Mr. Ramelb:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal dated December 18, 2008 with subject [Comment on Draft Environmental Impact Statement (DEIS) "Honolulu High-capacity transit corridor Project", Issue- Project Construction Phasing will not provide early traffic relief]:

As described in Section 2.5.10, Project Phasing, and further in Section 8.6.9, Construction Phasing, in the Final EIS, to support phased opening, the first construction phase must be connected to a maintenance and storage facility, which requires considerable space. The first phase of the Project must be connected to the maintenance and storage facility because, in addition to maintenance of equipment and ongoing operations, this facility houses the main control center for the entire Project. Accordingly, the required testing and operation of the system could not be completed without access to it. No location has been identified closer to Downtown with sufficient available land to construct a maintenance and storage facility. Therefore, construction will begin between East Kapolei and Leeward Community College. The Project will be constructed in phases to accomplish the following:

- *Match the anticipated schedule for right-of-way acquisition and utility relocations*
- *Reduce the time that each area will experience traffic and community disturbances*
- *Allow for multiple construction contracts with smaller contract size to promote more competitive bidding*
- *Match the rate of construction to what can be maintained with local workforce and available financial resources*
- *Balance expenditure of funds to minimize borrowing*

The portion of the corridor in the Ewa direction of Pearl Highlands is less developed than the areas in the Koko Head direction. Right-of-way can be obtained more quickly at the west end of the Project; therefore, overall project construction can begin earlier, resulting in lower total construction costs. Construction is planned to continue uninterrupted in the Koko Head direction from Pearl Highlands to Aloha Stadium, Kalihi, and finally to Ala Moana Center.

As portions of the Project are completed, each will be opened incrementally so that system benefits, even if limited during the initial phases, will be realized prior to completion of construction of the entire Project.

The financial plan is balanced for the entire Project so there will not be a situation in which only a portion of the system will be built. If there is a shortfall, additional revenue sources will be considered. Section 6.6 of the Final EIS discusses risks and uncertainties, as well as potential sources to cover shortfalls.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

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Submission Content/Notes : 29 December, 2008

To:
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Director Department of Transportation Services
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650 South King St. 3rd Floor
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FAX: (808) 587-6080

Subject: Comment on Draft Environmental Impact Statement (DEIS) "Honolulu High-capacity transit corridor Project",

Issue : The DEIS lacks the Managed Lane Alternative (MLA) as stated in the Notice of Intent (NOI) dated 7 Dec 2007 (reference (a), which states: "The Federal Transit Administration (FTA) and the City and County of Honolulu, Department of Transportation Services (DTS) intend to prepare an EIS (and Alternative Analysis (AA)) on a proposal by the City and County of Honolulu to implement transit improvements that potentially include high-capacity transit service in a 25-mile travel corridor between Kapolei and the University of Hawaii at Manoa and Waikiki. Alternatives proposed to be considered in the AA and draft EIS include No Build, Transportation System Management, Managed Lanes, and Fixed Guideway Transit. Other transit alternatives may be identified during the scoping process."

Discussion:
The process used by the City & County of Honolulu (City) for assessing the Managed Lane Alternative (MLA) in the City's Alternatives Analysis (AA) was flawed.
a) A similar length Managed Lane, reversible three-lane transit way was built for $320 million in Tampa in year 2005, while the City AA estimated the similar MLA to cost $2.6 Billion.
b) Professor Panos Prevedouros published a study for Managed Lanes (reversible) in March 2008, " Transportation Alternatives Analysis for Mitigating Traffic Congestion between Leeward Oahu and Honolulu" which shows the 11 mile three-lane cost estimate to be $900 million which is in line with the $320 million Tampa three-lane reversible transit way. The professor believes the Plan's costs are accurate based on cost estimate spreadsheet analysis received from a local heavy construction estimation expert is $818,634,000 in 2008 dollars. Again, this estimate is more in line with the Tampa three lane reversible Transit way estimate and refutes the AA estimate of $2.6 Billion. The AA estimate disqualified the Managed Lane Alternative to be inferior to the Rail Alternative which cost $3.7 Billion.

c) 2008 Mayoral Candidate Ann Kobayashi, using the Professor's Managed Lane study and the former Mayor Harris Administration BRT Study, proposed a similar Managed Lane 15-mile fixed guideway which is estimated at $1.2 Billion. The estimate is similar to the 11 mile Managed Lane and which should have been used in the AA rather than $2.6 Billion.

d) Parsons Brinkerhoff (PB) and the City proposed that automobiles with two or more occupants should be allowed toll free on the MLA. This made the current contraflow zipper lane untenable and thus provided the rationale for removing it. The net result was that the additional two lane advantage that the MLA offered to the Corridor was reduced to one lane. They failed to publish their assessment of the option of having all autos pay a toll, which would have resulted in the zipper lane and the two-lane advantage being retained. And they failed to analyze MLA options with higher occupancy thresholds, such as three through five occupants.

e) PB and the City added unnecessary costs to the project by proposing a 16-mile facility while not testing the viability of shorter 10 to 12-mile versions.

f) PB and the City inflated MLA operating costs to make the project appear uncompetitive with the Fixed Guideway Alternative. Just two examples are a) the projection of a totally unnecessary 5,400 parking stalls for the MLA, and b) saddling the MLA with inflated bus operating costs.

g) PB and the City engineered the ingress and egress ramps in a way that could only result in heavy traffic congestion at these points. In fact, the MLA has exit/off ramps along its route for access to job centers other than downtown Honolulu.

h) PB and the City grossly inflated the capital costs of the MLA with the result that, if correct, it would be twice the cost per lane mile of any highway ever built in the U.S. In his letter to the City and copied to FTA, Dr. Panos Prevedouros, Professor of Traffic Engineering at the University of Hawaii, Chair of the Transportation Research Board's Highway Micro-simulations Committee and a member of the Task Force, commented, "the most egregious violation of FTA's rules on alternative specification and analysis was the deliberate underengineering of the Managed Lanes Alternative to a degree that brings ridicule to prevailing planning and engineering principles."

i) The 11 mile, elevated reversible MLA, with three lanes as proposed by Professor Prevedouros, has the commuter capacity to eliminate the two H-1 bottlenecks at Pearl City and at Middle Street merge. The Rail, according to the AA, table 3-12, will result in 17,500 vehicles per hour on H-1 (H-1 full capacity = 9,500 vph) because the Rail cannot accommodate the full commuter demand in year 2030.

Conclusion: The City's AA wrongly estimated the cost of the Managed Lane Alternative and the MLA capacity to eliminate the H-1 bottlenecks on H-1.

Recommendation: It is requested that the Managed Lane Alternative as proposed by Ann Kobayashi's EzWay proposal or the Professor Prevedouros Managed Lane Study be reinstated into the Honolulu's Transit Corridor Draft Environmental Impact Statement

Reference (a):
[Federal Register: December 7, 2005 (Volume 70, Number 234)]
[Notices]
[Page 72871-72873] From the Federal Register Online via GPO Access [wais.access.gpo.gov] [DOCID:fr07de05-137]

Respectfully,

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June 11, 2010

RT10/09-336376

Mr. Ben Ramelb
1148 Ala Lilikoi Street
Honolulu, Hawaii 96818

Dear Mr. Ramelb:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal dated December 29, 2008 with subject [Comment on Draft Environmental Impact Statement (DEIS) "Honolulu High-capacity transit corridor Project"]:

Regarding the "Discussion" section of your letter:

a) The analysis of the Managed Lane Alternative from the Alternatives Analysis Report (DTS 2006b) shows the cost to be $2.6 billion in 2006 dollars (higher today). As stated in the City Council's Transit Advisory Task Force Report, a committee was charged with reviewing cost estimates for the two alternatives involving construction (the Managed Lane Alternative and Fixed Guideway Alternative). The report states that "the Task Force agrees with this committee that the Alternatives Analysis' construction cost estimates were fairly and consistently prepared, and that they may be used for both planning and cost comparisons." Information was obtained by the Task Force from the

Hawaii Department of Transportation and others familiar with managed lane facilities. It is the only estimate to date that addresses Honolulu conditions.

There is no substantiation of the estimate from the Tampa Bay toll facility being applicable in Honolulu. The designer of the Tampa Bay facility herself admitted that to apply such an estimate without detailed consideration of the many differences between the two locations is not reasonable. For clarification, the Tampa Bay elevated toll lanes extend only 5.8 miles within the 10-mile expressway. The costs quoted are from 2002, long before the costs of materials and construction rose dramatically after 2004. Furthermore, the corridor within which the Tampa Bay lanes are built required no right-of-way, had no significant utility conflicts, no major structures or crossings, and was built in much more favorable geotechnical conditions than exist on Oahu. In addition, the Transit Task Force Report dated December 14, 2006, states that "the committee concluded that the projects are sufficiently different (actual costs versus projected costs with contingencies; available, accessible ROW vs. construction in actively used highways; no utilities relocation vs. extensive relocations) as to make the comparison unreasonable."

b) As stated in response to your previous comment, the City Council's Transit Advisory Task Force reviewed the Alternatives Analysis Report. The Task Force concluded in its report dated December 14, 2006, that the assessment of each alternative was "fair and accurate," and that capital cost estimates were compiled using the same methodology and unit costs, and that the construction cost estimates were fairly and consistently prepared. The Task Force also concluded that the Project is not comparable to the Tampa Bay toll facility for the reasons stated above.

c) The proposed EzWay is similar to the Managed Lane Alternative that was thoroughly evaluated in the Alternatives Analysis, which also accommodated both single occupant and transit vehicles. No known cost estimate for the EzWay proposal was prepared or validated by a qualified registered professional engineer. As a point of reference, the State of Hawaii's Highway Modernization Plan dated January 22, 2009, estimates the cost of the Nimitz Viaduct at $600 million for an approximately 2.5-mile elevated highway with two lanes, which equals $240 million per mile. Using this estimate, a 15-mile facility would cost approximately $3.6 billion.

d) As discussed in the Chapter 5, Alternative 3b of the Detailed Definition of Alternatives Report (2006), the reversible lane Managed Lane Alternative provides three managed/HOV lanes in the peak direction, which is sufficient to satisfy the demand for restricted lanes. Eliminating the zipper lane frees up two off-peak direction lanes – one HOV and one general purpose lane. By 2030, the directional transportation demand will be more balanced than it is today. Eliminating the zipper lane while evaluating the Reversible Option for the Managed Lane Alternative provided the greatest benefit to modeled freeway users by increasing capacity in both directions. The system was optimized to balance demand without regard to toll policy. As stated in the Alternatives Analysis Report, for the Reversible Option, three-person high-occupancy vehicles (HOVs) would be allowed to use the facility for free while single-occupant and two-person HOVs would have to pay a toll.

e) A shorter managed lane system would have resulted in proportionately less benefit. As shown in the Alternatives Analysis, the full system evaluated already would provide substantially less benefit than the Fixed Guideway Alternative. Shortening of the Managed Lane Alternative, whether to 14 miles, or 10 to 12 miles, would not have increased the benefits to the traveling public compared to the alternative evaluated.

f) The operating and maintenance costs for all alternatives addressed in the Alternatives Analysis Report, including the Managed Lane Alternative, were estimated in a consistent manner as described in Chapter 5 of the Alternatives Analysis Report. The supply of park-and-ride stalls assumed for the Managed Lane Alternative was sized to meet forecast demand. The number of parking spaces was reflected in the capital costs of the Managed Lane Alternative, not in the operating and maintenance costs. One purpose of the Project is to improve benefits to transit users. With the Managed Lane Alternative, those benefits could only be provided through improvements to the bus system.

g) The Managed Lane Alternative evaluated in the Alternatives Analysis Report was designed by experts in such facilities. Access ramps were placed at locations that required direct access to the managed lanes because demand was high. Because of engineering requirements, access ramps require substantial rights-of-way and, as a result, are very costly. More ramps could be added, but it would make the project more expensive and reduce the point-to-point functionality of the system.

h) Please see the answers above to points a and b.

i) The Managed Lane Alternative would not eliminate congestion and bottlenecks on the H-1 Freeway. Table 3-12 in the Alternative Analysis Report shows that there would be 18,049 vehicles per hour (vph) operating on the H-1 Freeway in 2030 under the No Build Alternative. Vehicle volumes rise to 18,327 vph (Two-direction Option) or 18,419 vph (Reversible Option) with the Managed Lane Alternative, while traffic volumes decrease to 17,209 vph with the 20-mile Fixed Guideway Transit Alternative. Accordingly, the Fixed Guideway Transit Alternative will reduce traffic volumes from those projected under the 2030 No Build Alternative.

There could be many other versions of this type of system with minor adaptations to suit one or another special concern. In the end, the above approaches all have similar challenges as a primary solution to Honolulu's transportation problems. They do not reduce congestion, increase the reliability of the transportation system, serve future land use plans, or improve the fairness of and access to the transportation system. While the Managed Lane Alternative would reduce freeway congestion (measured as vehicle hours of delay), it would increase overall system congestion by inducing additional travelers to drive, which would result in increased congestion on arterial and collector facilities accessing the freeways and the managed lane. In addition, once a vehicle leaves the managed lane, that vehicle is still subjected to congestion on surrounding roadways. They also do not offer an alternative to perpetuating a reliance on limited existing travel modes. For example, localized bypasses would not meet system goals for corridor-wide

benefits to mobility, reliability, access, and equity. In sum, they do not address the Purpose and Need of the Project.

To address your conclusion and recommendation, the Managed Lane Alternative as proposed by Ann Kobayashi and Professor Prevedourous were evaluated and subsequently eliminated from further consideration. Their proposal is similar to the Managed Lane Alternative that was thoroughly evaluated in the Alternatives Analysis, which also accommodated both single occupant and transit vehicles. As stated previously, there could be many other versions of this type of system with minor adaptations to suit one or another special concern. In the end, the above approaches all have similar challenges as a primary solution to Honolulu's transportation problems. Please see points a and b regarding cost estimates for the Managed Lane Alternative.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
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Submission Date :	12/29/2008

Submission Content/Notes : 29 December, 2008

To:
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FAX: (808) 587-6080

Subject: Comment on Draft Environmental Impact Statement (DEIS) "Honolulu High-capacity transit corridor Project", Issue : The DEIS and alternative Analysis do not investigate a wide range of alternatives as required by law.

Discussion: The Alternative Analysis and DEIS failed to provide "... an assessment of a wide range of public transportation alternatives ..." and/or "... sufficient information to enable the Secretary to make the findings of project justification ..." as required by statute.

In addition, we believe that you will find that the City, PB and FTA failed to, "Rigorously explore and objectively evaluate all reasonable alternatives," and "Devote substantial treatment to each alternative considered in detail including the proposed action so that reviewers may evaluate their comparative merits," as required by the Council on Environmental Quality (CEQ) Sec. 1502.14.

Four alternatives should be assessed:
1) BRT transit system as proposed by the Harris Administration. The BRT route downtown should be limited to King and Beretania Streets (a couplet) and exclude Dillingham Blvd and Kapiolani Blvd which do not have sufficient lanes to accommodate BRT.
2) Managed Lane (reversible three lanes) as proposed by Professor Panos Prevedouros Study, "Transportation Alternatives Analysis for Mitigating Traffic Congestion between Leeward Oahu and Honolulu" which shows the 11 mile three-lane cost estimate to be $900 million which is in line with the $320 million Tampa three-lane reversible transit way. The full report is available at www.eng.hawaii.edu/~panos/UHCS.pdf.
3) Former mayoral candidate Ann Kobayashi's proposal for a 15 mile EzWay. See http://www.honoluluadvertiser.com/article/20081015/NEWS01/810150392/1001
4) Build two elevated highway bypasses around the H-1 bottlenecks at H-1/H-2 merge and at Middle St. merge. The bypasses include: (a) "Kamehameha HOV Flyover", a four-mile, three-lane reversible elevated hwy over the Kamehameha Hwy median between the H-1/H-2 merge and the H-1 Viaduct east of Aloha Stadium and (b) "Nimitz Flyover", a three- mile, three-lane reversible elevated hwy over the Nimitz Hwy median between the H-1 Viaduct at Keehi Lagoon Drive and Hotel St/Alakea St./ Halekauwila St/Ala Moana Blvd. An on/off ramp to Waikamilo Rd from the Nimitz bypass would reduce the number of lanes

from three to two between Waikamilo Rd and Iwilei. See attachment for more information on HOV Flyovers.

Recommendation: Include the above four alternatives in the DEIS.

Respectfully,

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Attachment – Description of Nimitz and Kamehameha HOV Flyovers
Nimitz Flyover, Reversible HOV:
The Nimitz HOV Flyover is a 3-mile reversible, elevated, three-lane structure over the Nimitz Highway median from the Airport Viaduct at Keehi Lagoon to Hotel Street and Alakea St/Halekauwila St. The Flyover would be built similar to the Tampa Elevated three-lane Reversible HOV as described in-
http://www.tollroadsnews.com/node/172 .
One of the three lanes would exit the Flyover at Waikamilo Rd. to provide access to job centers in Kalihi, resulting in the Flyover having only two lanes entering downtown. The downtown terminal connections from the Nimitz HOV Flyover include an elevated busway from Iwilei to Hotel Street and a single lane underpass to both Alakea St/Halekauwila Streets. These connections are described in a Managed Lane Study "Transportation Alternatives Analysis for Mitigating Traffic congestion between Leeward Oahu and Honolulu". The full report is available at www.eng.hawaii.edu/~panos/UHCS.pdf.
The initial 2005 cost for the 10 mile Tampa Reversible was $320 million or $32 Million per highway mile, however, a geotechnical design error increased the cost to $420 million or $42 million per mile. Using a geographic and escalation factor of 100 percent, the 3-mile Nimitz HOV

Flyover at $60 to $80 million per mile would cost $180 million to $240 million.
The "Nimitz Flyover" has an approved Final Environmental Impact Statement which allows for early construction.

Kamehameha Flyover, Reversible HOV:
The Kamehameha HOV Flyover is a 3-mile reversible, elevated, three-lane structure over the median of Kamehameha Highway from the H-1/H-2 merge at the Waiawa Interchange to the Airport Viaduct just diamond head of the Aloha Stadium. The Flyover would be built similar to the Tampa Elevated three-lane Reversible HOV as described in-http://www.tollroadsnews.com/node/172 .
The Kamehameha Flyover would be connected to H-1, H-2, Kamehameha Highway and Farrington Highway at the west end and to the Airport Viaduct at the east end. These connections are described in a Managed Lane Study "Transportation Alternatives Analysis for Mitigating Traffic congestion between Leeward Oahu and Honolulu". The full report is available at www.eng.hawaii.edu/~panos/UHCS.pdf.
The initial 2005 cost for the 10 mile Tampa Reversible was $320 million or $32 Million per highway mile, however, a geotechnical design error increased the cost to $420 million or $42 million per mile. Using a geographic and escalation factor of 100 percent, the 4-mile Kamehameha HOV Flyover at $60 to $80 million per mile would cost between $240 million to $320 million.
The Draft Environmental Impact Statement (DEIS) - Honolulu High-Capacity Transit Corridor Project Nov 2008 , shows the rail route over Kamehameha Highway between Pearl City and Aloha Stadium which could conflict with the proposed three-lane "Kamehameha Flyover" route outlined above. If the rail is built, it is suggested that both the Kamehameha Highway "Flyover" and the Rail be built within the elevated Kamehameha Highway corridor. In this case, only a two-lane "Kamehameha Flyover" is needed (instead of three-lanes) to be built alongside and parallel to the Rail transit. The rail with a capacity of 6,000 commuters per hour and the two-lane "Kamehameha Flyover", with a capacity of 4,000 vehicles per hour, should be adequate to substantially reduce the bottleneck at the H-1/H-2 merge and the traffic congestion on H-1 between Pearl City and Aloha Stadium.

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
MAYOR

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DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT10/09-336383

Mr. Ben Ramelb
1148 Ala Lilikoi Street
Honolulu, Hawaii 96818

Dear Mr. Ramelb:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal dated December 29, 2008 with subject [Comment on Draft Environmental Impact Statement (DEIS) "Honolulu High-capacity transit corridor Project", Issue: The DEIS and alternative Analysis do not investigate a wide range of alternatives as required by law]:

In response to the discussion section of your letter, the Alternatives Analysis process, as documented in Chapter 2 of the Draft EIS, evaluated a broad range of transit mode and general alignment alternatives to provide improved mobility in the study corridor. An initial screening process considered alternatives identified through previous transit studies, a field review of the study corridor, an analysis of current population and employment data for the study corridor, a literature review of technology modes, work completed for the Oahu Regional Transportation Plan 2030 (ORTP) prepared by the Oahu Metropolitan Planning Organization (OahuMPO) (OahuMPO 2007), and public and agency comments received during the formal Alternatives Analysis scoping process.

During the fall of 2005 and winter of 2006, the City and County of Honolulu completed the alternatives screening process that is documented in the Honolulu High-Capacity Transit Corridor Project Alternatives Screening Memorandum (DTS 2006a). Scoping meetings were held, which included a presentation of alternatives to the public and interested agencies and officials to receive comments on the Purpose and Need, alternatives, and scope of the analysis for the Alternatives Analysis. Refinements were made to alternatives.

The scoping process in March of 2007 requested that the public propose alternatives that would satisfy the Purpose and Need at less cost or with greater effectiveness or less environmental or community impact and were not previously studied and eliminated for good cause. The only alternative proposed that met this criteria was Fixed Guideway Transit following an alternative alignment. All reasonable alternatives that have been identified and that satisfy the Purpose and Need at less cost or with greater effectiveness or less environmental or community impact and were not previously studied and eliminated for good cause have been evaluated in the Draft EIS.

In response to the four alternatives suggested in your letter:

1) As stated in Chapter 2 of the Final EIS, prior to selecting an elevated fixed guideway system, a variety of high-capacity transit options were evaluated during the Primary Corridor Transportation Project (1998-2002) and Alternatives Analysis. Options evaluated and rejected include an exclusively at-grade fixed guideway system using bus rapid transit vehicles. In addition to comments received during the Alternatives Analysis and EIS scoping sessions, these studies provided a critical foundation for the conclusion that an elevated system would result in the best overall performance and better support of the Purpose and Need for the Project. In addition, the proposed Bus Rapid Transit Alternative, as stated in your letter, is a variation of the Transportation System Management Alternative that was evaluated in the Alternatives Analysis. While this alternative has merit for cost-effectiveness, its overall system benefit would be very low.

2) The Managed Lane Alternative was fully evaluated in the Alternatives Analysis. The Managed Lane Alternative would not eliminate congestion and bottlenecks on the H-1 Freeway. Table 3-12 in the Alternative Analysis shows that, under the No Build Alternative, there would be 18,049 vehicles per hour (vph) operating on the H-1 Freeway in 2030. Vehicle volumes rise to 18,327 vph (Two-direction Option) or 18,419 vph (Reversible Option) with the Managed Lane Alternative, while traffic volumes decrease to 17,209 vph with the 20-mile Fixed Guideway Transit Alternative. Accordingly, the Fixed Guideway Transit Alternative will reduce traffic volumes from those projected under the 2030 No Build Alternative.

The analysis of the Managed Lane Alternative from the Alternatives Analysis Report (DTS 2006b) shows the cost to be $2.6 billion in 2006 dollars (higher today). As stated in the City Council's Transit Advisory Task Force Report, a committee was charged with reviewing cost estimates for the two alternatives involving construction (the Managed Lane Alternative and Fixed Guideway Alternative). The report states that "the Task Force agrees with this committee that the Alternatives Analysis' construction cost estimates were fairly and consistently prepared, and that they may be used for both

planning and cost comparisons." Information was obtained by the Task Force from the Hawaii Department of Transportation and others familiar with managed lane facilities. It is the only estimate to date that addresses Honolulu conditions.

There is no substantiation of the estimate from the Tampa Bay toll facility being applicable in Honolulu. The designer of the Tampa Bay facility herself admitted that to apply such an estimate without detailed consideration of the many differences between the two locations is not reasonable. For clarification, the Tampa Bay elevated toll lanes extend only 5.8 miles within the 10-mile expressway. The costs quoted are from 2002, long before the costs of materials and construction rose dramatically after 2004. Furthermore, the corridor within which the Tampa Bay lanes are built required no right-of-way, had no significant utility conflicts, no major structures or crossings, and was built in much more favorable geotechnical conditions than exist on Oahu. In addition, the Transit Task Force Report dated December 14, 2006, states that "the committee concluded that the projects are sufficiently different (actual costs versus projected costs with contingencies; available, accessible ROW vs. construction in actively used highways; no utilities relocation vs. extensive relocations) as to make the comparison unreasonable."

3) The EzWay 15-mile, three-lane viaduct concept was developed as a hybrid of a plan for elevated toll lanes and some form of rubber-tire-on-concrete transit system. It is similar to the Managed Lane Alternative that was thoroughly evaluated in the Alternatives Analysis, which also accommodated both single occupant and transit vehicles. No known cost estimate for the EzWay proposal was prepared or validated by a qualified registered Professional Engineer. As a point of reference, the State of Hawaii's Highway Modernization Plan dated January 22, 2009, estimates the cost of the Nimitz Viaduct at $600 million for an approximately 2.5-mile elevated highway with two lanes, which equals $240 million per mile. Using this estimate, a 15-mile facility would cost approximately $3.6 billion.

4) Localized bypasses would not meet system goals for corridor-wide benefits to mobility, reliability, access, and equity. The Hawaii Department of Transportation, which is responsible for the freeway system, has evaluated needs for the freeway system and identified the highway projects that would be most efficient at reducing congestion on Oahu. The projects in the Oahu Regional Transportation Plan, including a Nimitz Flyover, are listed in Table 2-3 of the Draft EIS and included in the analysis for all project alternatives (the No Build Alternative and the Project). Effects of the Nimitz Flyover on traffic conditions in 2030 are discussed in Section 3.4.2 of the Final EIS. Travel on the Nimitz Flyover was included for the following travel pairs under the No Build Alternative: Kapolei to Downtown, Ewa to Downtown, and Mililani to Downtown. As shown in Figure 3-7 of the Final EIS, the Nimitz Flyover does improve transit travel times with the No Build Alternative between certain travel pairs (e.g., between Mililani and Downtown) compared to 2007 conditions. However, as also shown in this figure, travel times improve substantially more with the addition of the Project. As a point of clarification, a Final EIS was never prepared for the Nimitz Flyover.

There could be many other versions of this type of system with minor adaptations to suit one or another special concern. In the end, the above approaches all have similar challenges as a primary solution to Honolulu's transportation problems. They do not reduce congestion, increase the reliability of the transportation system, serve future land use plans, or improve the fairness of and access to the transportation system. While the Managed Lane Alternative would reduce freeway congestion (measured as vehicle hours of delay), it would increase overall system congestion by inducing additional travelers to drive, which would result in increased congestion on arterial and collector facilities accessing the freeways and the managed lane. In addition, once a vehicle leaves the managed lane, that vehicle is still subjected to congestion on surrounding roadways. They also do not offer an alternative to perpetuating a reliance on limited existing travel modes. For example, localized bypasses would not meet system goals for corridor-wide benefits to mobility, reliability, access, and equity. In sum, they do not address the Purpose and Need of the Project.

As noted in response to your comments above, the four alternatives that you have proposed would not substantially reduce or eliminate system-wide traffic congestion nor are they as effective at meeting the goals and objectives for the Project.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
Creation Date :	12/29/2008
Creator Affiliation :	
First Name :	Ben
Last Name :	Ramelb
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Submission Method :	Website
Other Submission Method :	
Submission Date :	12/29/2008

Submission Content/Notes : 29 December, 2008

To:
Mr. Wayne Yoshioka
Director Department of Transportation Services
City and County of Honolulu
650 South King St. 3rd Floor
Honolulu
HI 96813
FAX: (808) 587-6080

Subject: Comment on Draft Environmental Impact Statement (DEIS) "Honolulu High-capacity transit corridor Project: Issue - Scope of Work reduced in DEIS from scope stipulated in 2006 Notice of Intent

Fact:
The project scope outlined in the 2006 Notice of Intent (NOI) agreement between the Federal Transit Administration and the City and County of Honolulu is violated. The NOI explicitly mentions a fixed guideway from Kapolei to the UH. The DEIS fixed guide way starts well outside Kapolei and ends at Ala Moana Shopping Center. The 34 miles have become 20 miles in the DEIS.

Discussion:

The DEIS reduces the project scope as stated in the Notice of Intent (NOI) dated 7 Dec 2007 reference (a), which states:
"The Federal Transit Administration (FTA) and the City and County of Honolulu, Department of Transportation Services (DTS) intend to prepare an EIS (and Alternative Analysis (AA)) on a proposal by the City and County of Honolulu to implement transit improvements that potentially include high-capacity transit service in a 25-mile travel corridor between Kapolei and the University of Hawaii at Manoa and Waikiki."

Discussion:
The City's 2006 Alternatives Analysis states that "The primary project study area is the travel corridor between Kapolei and the University of Hawai'i at Manoa.

The DEIS covers a fixed guideway route of 20 miles from Kapolei to Ala Moana Center. The Draft Environmental Impact of the fixed guideway is limited to only the 20 miles rather than the full 34 miles from Kalaeloa to Waikiki and UN Manoa.

Conclusion:
The project scope outlined in the 2006 Notice of Intent (NOI) agreement between the Federal Transit Administration and the City and County of Honolulu is violated.

Recommendation:

It is strongly recommended that the project scope contained in the DEIS be expanded to include a rail route to both Waikiki and to UH Manoa.

Respectfully,

Ben Rameib P.E.
1148 Ala Lilikoi St
Honolulu, HI
96818

Reference (a):
[Federal Register: December 7, 2005 (Volume 70, Number 234)]
[Notices]
[Page 72871-72873] From the Federal Register Online via GPO Access
[wais.access.gpo.gov] [DOCID:fr07de05-137]

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SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT10/09-336388

Mr. Ben Ramelb
1148 Ala Lilikoi Street
Honolulu, Hawaii 96818

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Subject: Honolulu High-Capacity Transit Corridor Project
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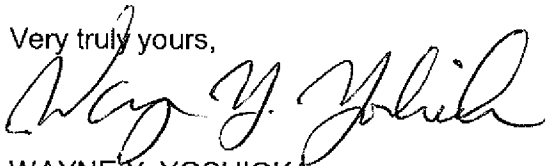
The Project has logical termini at East Kapolei and Ala Moana Center and independent utility from any extensions that may be constructed in the future. The future extensions to West Kapolei, Salt Lake Boulevard, Waikiki, and UH Manoa are discussed in the cumulative impacts sections of Chapters 3 and 4 of the Final EIS. However, the future extensions are not part of this Project; thus, they are not required to be evaluated under Chapter 343 of the Hawaii Revised Statutes and NEPA. Under NEPA, environmental analysis is only required when there is a proposed action by a Federal agency. Here, because the future extensions are not proposed for implementation at this time, they are not part of the Project studied in the Final EIS. It would be premature to undertake an environmental analysis of the extensions (beyond the cumulative impacts analysis) because they are not part of the proposed action to be taken by

the City and FTA. If the future extensions are proposed for implementation in the future, environmental analysis of the extensions and appropriate alternatives will be undertaken at that time.

The December 2005 Notice of Intent was superseded by the March 2007 Notice of Intent for preparation of the NEPA EIS. The March 2007 Notice of Intent states: "Both alignment alternatives would have a future extension from Downtown Honolulu to UH Manoa with a future branch to Waikiki, and a future extension at the Waianae (western) end to Kalaeloa Boulevard in Kapolei." No Notice of Intent for the Project was issued in 2006. While the fixed guideway system directly connects East Kapolei to Ala Moana Center, the remainder of the study corridor is served by buses integrated with the system. Future extensions would be subject to a complete environmental review at the time they are proposed.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,



WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
Creation Date :	12/29/2008
Creator Affiliation :	
First Name :	Ben
Last Name :	Rameib
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Submission Method :	Website
Other Submission Method :	
Submission Date :	12/29/2008

Submission Content/Notes : 29 December, 2008

To:
Mr. Wayne Yoshioka
Director Department of Transportation Services
City and County of Honolulu
650 South King St. 3rd Floor
Honolulu
HI 96813
FAX: (808) 587-6080

Subject: Comment on Draft Environmental Impact Statement (DEIS) "Honolulu High-capacity transit corridor Project", Issue : The DEIS incorrectly excludes Managed Lanes and other alternatives

Discussion: DEIS Chapter 2 summarizes alternatives considered for the Honolulu High-Capacity Transit Corridor Project. The alternatives considered were chosen primarily by the Alternative Analysis published in 2006.

The AA was flawed because it failed to include several transit alternatives, each with the capability to substantially reduce or eliminate the traffic congestion on H-1 at Pearl City and Middle St. merge in year 2030. As shown on Table 3-12 of the AA and DEIS Table 3-12, All rail alternatives result in worse traffic congestion on H-1 AFTER any rail alternative is built and operating.

The fact that rail will worsen congestion on H-1 after spending a minimum of $6.2 Billion for the Rail alternative, it is totally unacceptable to the Oahu taxpayer to continue to face worse traffic congestion on H-1 which is the single, primary reason for building a "mass transit system".

As a minimum, the DEIS should include the following additional alternatives:

Four alternatives should be assessed:
1) BRT transit system as proposed by the Harris Administration. The BRT route downtown should be limited to King and Beretania Streets and exclude Diffingham Blvd and Kapiolani Blvd.
2) Managed Lane (reversible) as proposed by Professor Panos Prevedouros Study, "Transportation Alternatives Analysis for Mitigating Traffic Congestion between Leeward Oahu and Honolulu" which shows the 11 mile three-lane cost estimate to be $900 million which is in line with the $320 million Tampa three-lane reversible transitway.
3) Former mayoral candidate Ann Kobayashi's proposal for a 15 mile EzWay. See http://www.honoluluadvertiser.com/article/20081015/NEWS01/810150392/1001
4) Build two elevated highway bypasses around the H-1 bottlenecks at H-1/H-2 merge and at Middle St. merge. The bypasses include: a) a 4 mile, three-lane reversible elevated highway (Kamehameha Flyover) over the Kamehameha Hwy median between the H-1/H-2 merge and the H-1 Viaduct at Aloha Stadium and b) a 3 mile, three-lane reversible

elevated hwy (Nimitz Flyover) over the Nimitz Hwy median between the H-1 Viaduct at Keehi Lagoon Drive and Hotel St/Alakea St./ Halekauwila St/Ala Moana Blvd. An on/off ramp to Waikamilo Rd from the Nimitz bypass would reduce the number of lanes from three to two between Waikamilo Rd and Iwilei. See attachment for more information on HOV flyovers.

Conclusion: The above four transit alternatives meet the goals and objectives of the Honolulu General Plan and Oahu Regional Transportation Plan and therefore should be includes for consideration for Oahu Mass Transit system in the West Oahu corridor.

Recommendation: Include the above four alternatives in the DEIS.

Respectfully,

Ben Ramelb P.E.
1148 Ala Lilikoi St.
Honolulu HI 96818

Copy to:
1) Mr. Ted Matley
FTA Region IX
201 Mission St. Suite 1650
San Francisco, CA 94105
FAX 415-744-2726

2) Governor Linda Lingle
Hawaii State Capitol
415 S Beretania St. 5th Floor
Honolulu, HI 96813
FAX (808) 586-0006

3) Honolulu City Council Members
FAX (808) 867-5011

Attachment – Description of Nimitz and Kamehameha HOV Flyovers
Nimitz Flyover, Reversible HOV:
The Nimitz HOV Flyover is a 3-mile reversible, elevated, three-lane structure over the Nimitz Highway median from the Airport Viaduct at Keehi Lagoon to Hotel Street and Alakea St/Halekauwila St. The Flyover would be built similar to the Tampa Elevated three-lane Reversible HOV as described in-
http://www.tollroadsnews.com/node/172 .
One of the three lanes would exit the Flyover at Waikamilo Rd. to provide access to job centers in Kalihi, resulting in the Flyover having only two lanes entering downtown. The downtown terminal connections from the Nimitz HOV Flyover include an elevated busway from Iwilei to Hotel Street and a single lane underpass to both Alakea St/Halekauwila Streets. These connections are described in a Managed Lane Study

"Transportation Alternatives Analysis for Mitigating Traffic congestion between Leeward Oahu and Honolulu". The full report is available at www.eng.hawaii.edu/~panos/UHCS.pdf.
The initial 2005 cost for the 10 mile Tampa Reversible was $320 million or $32 Million per highway mile, however, a geotechnical design error increased the cost to $420 million or $42 million per mile. Using a geographic and escalation factor of 100 percent, the 3-mile Nimitz HOV Flyover at $60 to $80 million per mile would cost $180 million to $240 million.
The "Nimitz Flyover" has an approved Final Environmental Impact Statement which allows for early construction.

Kamehameha Flyover, Reversible HOV:
The Kamehameha HOV Flyover is a 3-mile reversible, elevated, three-lane structure over the median of Kamehameha Highway from the H-1/H-2 merge at the Waiawa Interchange to the Airport Viaduct just diamond head of the Aloha Stadium. The Flyover would be built similar to the Tampa Elevated three-lane Reversible HOV as described in-http://www.tollroadsnews.com/node/172 .
The Kamehameha Flyover would be connected to H-1, H-2, Kamehameha Highway and Farrington Highway at the west end and to the Airport Viaduct at the east end. These connections are described in a Managed Lane Study "Transportation Alternatives Analysis for Mitigating Traffic congestion between Leeward Oahu and Honolulu". The full report is available at www.eng.hawaii.edu/~panos/UHCS.pdf.
The initial 2005 cost for the 10 mile Tampa Reversible was $320 million or $32 Million per highway mile, however, a geotechnical design error increased the cost to $420 million or $42 million per mile. Using a geographic and escalation factor of 100 percent, the 4-mile Kamehameha HOV Flyover at $60 to $80 million per mile would cost between $240 million to $320 million.
The Draft Environmental Impact Statement (DEIS) - Honolulu High-Capacity Transit Corridor Project Nov 2008 , shows the rail route over Kamehameha Highway between Pearl City and Aloha Stadium which could conflict with the proposed three-lane "Kamehameha Flyover" route outlined above. If the rail is built, it is suggested that both the Kamehameha Highway "Flyover" and the Rail be built within the elevated Kamehameha Highway corridor. In this case, only a two-lane "Kamehameha Flyover" is needed (instead of three-lanes) to be built alongside and parallel to the Rail transit. The rail with a capacity of 6,000 commuters per hour and the two-lane "Kamehameha Flyover", with a capacity of 4,000 vehicles per hour, should be adequate to substantially reduce the bottleneck at the H-1/H-2 merge and the traffic congestion on H-1 between Pearl City and Aloha Stadium.

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
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SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT10/09-336390

Mr. Ben Ramelb
1148 Ala Lilikoi Street
Honolulu, Hawaii 96818

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planning and cost comparisons." Information was obtained by the Task Force from the Hawaii Department of Transportation and others familiar with managed lane facilities. It is the only estimate to date that addresses Honolulu conditions.

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3) The EzWay 15-mile, three-lane viaduct concept was developed as a hybrid of a plan for elevated toll lanes and some form of rubber-tire-on-concrete transit system. It is similar to the Managed Lane Alternative that was thoroughly evaluated in the Alternatives Analysis, which also accommodated both single occupant and transit vehicles. No known cost estimate for the EzWay proposal was prepared or validated by a qualified registered professional engineer. As a point of reference, the State of Hawaii's Highway Modernization Plan dated January 22, 2009, estimates the cost of the Nimitz Viaduct at $600 million for an approximately 2.5-mile elevated highway with two lanes, which equals $240 million per mile. Using this estimate, a 15-mile facility would cost approximately $3.6 billion.

4) Localized bypasses would not meet system goals for corridor-wide benefits to mobility, reliability, access, and equity. The Hawaii Department of Transportation, which is responsible for the freeway system, has evaluated needs for the freeway system and identified the highway projects that would be most efficient at reducing congestion on Oahu. The projects, including a Nimitz Flyover, are listed in Table 2-3 of the Draft EIS and included in the analysis for all project alternatives. Effects of the Nimitz Flyover on traffic conditions in 2030 are discussed in Section 3.4.2 of the Final EIS. Travel on the Nimitz Flyover was included for the following travel pairs under the No Build Alternative: Kapolei to Downtown, Ewa to Downtown, and Mililani to Downtown. As shown in Figure 3-7 of the Final EIS, the Nimitz Flyover does improve transit travel times with the No Build Alternative between certain travel pairs (e.g., between Mililani and Downtown) compared to 2007 conditions. However, as also shown in this figure, travel times improve substantially more with the addition of the Project. As a point of clarification, a Final EIS was never prepared for the Nimitz Flyover.

There could be many other versions of this type of system with minor adaptations to suit one or another special concern. In the end, the above approaches all have similar

challenges as a primary solution to Honolulu's transportation problems. They do not reduce congestion, increase the reliability of the transportation system, serve future land use plans, or improve the fairness of and access to the transportation system. While the Managed Lane Alternative would reduce freeway congestion (measured as vehicle hours of delay), it would increase overall system congestion by inducing additional travelers to drive, which would result in increased congestion on arterial and collector facilities accessing the freeways and the managed lane. In addition, once a vehicle leaves the managed lane, that vehicle is still subjected to congestion on surrounding roadways. They also do not offer an alternative to perpetuating a reliance on limited existing travel modes. For example, localized bypasses would not meet system goals for corridor-wide benefits to mobility, reliability, access, and equity. In sum, they do not address the Purpose and Need of the Project.

As noted in response to your comments above, the four alternatives that you have proposed would not substantially reduce or eliminate system-wide traffic congestion, nor are they as effective at meeting the goals and objectives of the Project.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
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Submission Date :	12/29/2008

Submission Content/Notes : 29 December, 2008

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Subject: Comment on Draft Environmental Impact Statement (DEIS) "Honolulu High-capacity transit corridor Project", Issue : The DEIS unjustly excludes Managed Lanes and other alternatives

Discussion:
DEIS Chapter 2 evaluates only "No build and Steel Wheel Rail Transit" alternatives identified by the 2006 City Alternative Analysis. The AA intentionally assigned flawed information to the Managed Lanes Alternative (MLA) to eliminate the MLA from further consideration for Oahu's Mass Transit system. The flawed information is further displayed in Honolulutransit.com which makes a comparison of Mass Transit Options including the MLA (aka HOT) and is shown below. Honolulutransit.com provides a chart to compare the Mass Transit options and concludes that Steel Wheel Rail Transit is the best option. The Mass Transit Options included:
1) Steel Wheel Rail Transit (SWRT)
2) Rubber Tire Fixed Guideway (RTFG)
3) Elevated "HOT" Toll roads or Managed Lanes (HOT)

Comparison of Options (see chart in www.honolulutransit.com/FAQ under "Why was steel wheel Technology chosen for Honolulu?"
A) Lowest construction cost: SWRT – YES ; RTFG – NO ; HOT - NO.
B) Lowest Cost to maintain and operate: SWRT – YES ; RTFG – NO ; HOT - NO.
C) Qualifies for federal transit funding: SWRT – YES ; RTFG – YES ; HOT - NO.
D) Highest Passenger Capacity: SWRT – YES ; RTFG – YES ; HOT - NO.
E) Electric-powered, can run on wind, solar, H-power: SWRT – YES ; RTFG – YES ; HOT - NO.
F) Lightest construction impact on community: SWRT – YES ; RTFG – YES ; HOT - NO.
G) Greatest relief of traffic congestion: SWRT – YES ; RTFG – YES ; HOT - NO.
H) Lowest operating noise levels: SWRT – YES ; RTFG – NO ; HOT - NO.
I) Most proven transit solution: SWRT – YES ; RTFG – NO ; HOT - NO.
There are comparison flaws between HOT and SWRT or RTFG in each of the above topics. However, the major flawed comparisons are found in comparisons "A", "D", and "G" as explained below.

Discussion of Comparison A) - (Rail has) Lowest construction Cost:

The capital cost estimate for the 30 mile SWRT in the Alternative Analysis (Table 5-1) is $5.5 Billion for Kamokila to Waikiki or $183 million per mile (rail includes 20 + four story rail stations, 180 land acquisition and power substations at each rail station). The Alternative Analysis assigns a capital cost estimate for 11 mile HOT two-lane reversible highway from Waikele to Iwilei at $2.57 Billion or $233 million per mile (HOT has zero bus stations and zero power substations).
The AA-assigned capital cost estimate for the HOT reversible at $233 per mile is grossly incorrect based on several factors:
a) The Oahu Regional Transportation Plan (ORTP 2030) link http://oahumpo.org/ortp/ORTP2030/OMPO_Report_FINAL.pdf shows the State Project No. 52 - 2.2 mile Nimitz two-lane elevated flyover at $250 million (State DOT cost Estimate) or $113 million per mile.
b) The 10 mile Tampa three-lane elevated expressway http://www.tollroadsnews.com/node/172 cost $420 million or $42 million per mile.
c) The AA assigned cost estimate for the HOT reversible would conclude that the HOT would cost twice as much per lane mile as H-3, the most expensive highway because it had to bore two tunnels through the Koolaus.
d) Professor Panos Prevedouros study "Transportation Alternative Analysis for Mitigating traffic Congestion between Leeward Oahu and Honolulu" March 2008, shows a cost estimate for a three lane, 11 mile elevated Managed Lane for $900 million or $81 million per mile. The Managed Lane facility is similar in construction to the Tampa three lane elevated reversible. The full report is available at www.eng.hawaii.edu/~panos/UHCS.pdf.
Conclusion: It is concluded that the AA-assigned capital cost estimate for the HOT reversible at $233 per mile is grossly incorrect and that a three-lane reversible HOT or managed lane is estimated to cost not more than $80 million per mile or $880 million for 11 miles from the H-1/H-2 merge to downtown Hotel Street.

Discussion of Comparison D) - (Rail has) Highest Passenger Capacity:
Numbers from Table 3-12 of city 2006 Nov Alternative Analysis ($10 million report):

Rail only: The rail has a peak passenger capacity of 6,000 commuters per hour (2,000 seated, 4,000 standees) based on 300 commuters per train group at 3 minute intervals. Also see honolulutransit.com/FAQ "What is Honolulu Rail Transit?" for rail commuter capacity.

HOT or Managed Lane: The HOT will have three lanes, each lane has a capacity of 2000 vph. For three lanes, the vehicular capacity is 6000 vehicles per hour. The HOT person capacity is calculated thus:
Projected use of the HOT during peak hour includes:
200 express buses w/~50 pns = 10,000 pns
500 HOV5 (carpool) = 2,500 pns
500 vanpool (~5pns) = 2,500 pns.

Remaining excess capacity available for low occupancy vehicles:
6,000 vph minus (200 + 500 + 500) = 4,800 vph. 4,800 low occupancy vehicles

Average persons per vehicle = 1.2 pns per vehicle
4,800 vehicles with 1.2 pns = 5700 pns

Summary: HOT persons capacity = 10,000 + 2,500 +2,500 + 5,700 = ~ 20,700 pns

Conclusion: Rail carries 6,000 commuters per hour while a three-lane HOT or Managed Lane carries about 20,000 commuters per hour. Managed Lane Alternative carries over three times the commuter capacity of rail.

Comparison G) - (Rail provides) Greatest relief of traffic congestion: Numbers from Table 3-12 of city 2006 Nov Alternative Analysis ($10 million report):

Rail only: The rail has a peak passenger capacity of 6,000 commuters per hour (2,000 seated, 4,000 standees) based on 300 commuters per train group at 3 minute intervals.
H-1 only: rated capacity = 9,500 vehicles per hour (equivalent 15,400 commuters per hour)

H-1 forecast yr 2030 traffic load = 17,500 vehicles per hour per City AA Table 3-12 (or 8,000 vph overload = 9,600 commuters per hour)

Managed Lane three-Lane HOV Reversible Flyover: capacity = 6,000 high occupancy vehicles per hour (equivalent 21,600 commuters per hour). Capacity based on HOV use on Flyover by 200 express buses per peak hour , car pools, van pools, green cars and HOV2. (50 pns per express bus and 5800 vph at avge 2 pns per vehicle).

Year 2030 commuter load by City AA Report = Rail (6000) + H-1 overload (9,600) + H-1 capacity (15,400) = 31,000 commuters.

2030 Load = 31,000 commuters per hour
Rail + H-1 = 21,400 commuters per hour
Managed Lane HOV + H-1 = 37,000 commuters per hour

Conclusion: Rail does not have sufficient commuter capacity which will cause 9,600 commuters to be stuck in gridlock on H-1 or stuck at rail stations (especially at stations between Waipahu and Kalihi). Managed Lane HOV Alternative will eliminate congestion and bottlenecks on H-1.
Overall Conclusion and Recommendation:
It is concluded that the Managed Lane (three-Lane HOT) Alternative was erroneously discarded for further evaluation in the Alternative Analysis and therefore it is recommended that the Managed Lane (Three-Lane elevated HOT) must be reinstated into the DEIS for consideration as a viable Mass Transit Alternative.

Respectfully,

Ben Rameib P.E.
1148 Ala Lilikoi St.

Honolulu HI 96818

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3) Honolulu City Council Members
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WAYNE Y. YOSHIOKA
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DEPUTY DIRECTOR

June 11, 2010

RT10/09-336399

Mr. Ben Ramelb
1148 Ala Lilikoi Street
Honolulu, Hawaii 96818

Dear Mr. Ramelb:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal dated December 29, 2008 with subject [Comment on Draft Environmental Impact Statement (DEIS) "Honolulu High-capacity transit corridor Project", Issue : The DEIS unjustly excludes Managed Lanes and other alternatives]:

Regarding the beginning of your discussion, during the Alternatives Analysis, the capital costs of the various Managed Lane Alternative options and the various Fixed Guideway Transit Alternative options were estimated using a consistent methodology. The analysis of the Managed Lane Alternative from the Alternatives Analysis Report *(DTS 2006b) shows the cost to be $2.6 billion in 2006 dollars (higher today). As stated in the City Council's Transit Advisory Task Force Report dated December 14, 2006, a committee was charged with reviewing cost estimates for the two alternatives involving construction (the Managed Lane Alternative and Fixed Guideway Alternative). The report states that "the Task Force agrees with this committee that the Alternatives Analysis' construction cost estimates were fairly and consistently prepared, and that they may be used for both planning and cost comparisons." Information was obtained by the Task Force from the Hawaii Department of Transportation and others familiar with managed lane facilities. It is the only estimate to date that addresses Honolulu conditions.*

We will now address your comments about the Alternatives Analysis in the same manner as submitted.

Discussion of Comparison A) – Construction Cost:

a) The State of Hawaii's Highway Modernization Plan dated January 22, 2009, estimates the cost of the Nimitz Viaduct at $600 million for an approximately 2.5-mile elevated highway with two lanes, which equals $240 million per mile.

b) There is no substantiation of the estimate from the Tampa Bay toll facility being applicable in Honolulu. The designer of the Tampa Bay facility herself admitted that to apply such an estimate without detailed consideration of the many differences between the two locations is not reasonable. For clarification, the Tampa Bay elevated toll lanes extend only 5.8 miles within the 10-mile expressway. The costs quoted are from 2002, long before the costs of materials and construction rose dramatically after 2004. Furthermore, the corridor within which the Tampa Bay lanes are built required no right-of-way, had no significant utility conflicts, no major structures or crossings, and was built in much more favorable geotechnical conditions than exist on Oahu. In addition, the Transit Task Force Report dated December 14, 2006, states that "the committee concluded that the projects are sufficiently different (actual costs versus projected costs with contingencies; available, accessible ROW vs. construction in actively used highways; no utilities relocation vs. extensive relocations) as to make the comparison unreasonable."

c) According to construction cost indices prepared by the Washington State Department of Transportation, construction costs doubled between 1997 (the year construction ended on the H-3 Freeway) and 2006 (the year of the Alternatives Analysis). If construction of the H-3 Freeway had begun in 2006, that project would have cost approximately $2.6 billion. In addition, both the H-3 Freeway and the Managed Lane Alternative face unique situations that affect cost estimates. Construction of the Managed Lane Alternative would have occurred in a heavily developed corridor. As a result, there would be substantial disruptions to traffic and utilities, both of which add to the time, and thus cost, of a project. The H-3 Freeway was built in an undeveloped part of the island and which it had its own challenges, expensive traffic and utility disruptions were minimal.

d) The analysis of the Managed Lane Alternative from the Alternatives Analysis Report shows the cost to be $2.6 billion in 2006 dollars (higher today). As stated in the City Council's Transit Advisory Task Force Report dated December 14, 2006, a committee was charged with reviewing cost estimates for the two alternatives involving construction (the Managed Lane Alternative and Fixed Guideway Alternative). The report states that "the Task Force agrees with this committee that the Alternatives Analysis' construction cost estimates were fairly and consistently prepared, and that they may be used for both planning and cost comparisons." Information was obtained by the Task Force from the Hawaii Department of Transportation and others familiar with managed lane facilities. It is the only estimate to date that addresses Honolulu conditions. As stated previously, the State of Hawaii's Highway Modernization Plan dated January 22, 2009, estimates the cost of the Nimitz Viaduct at $600 million for an

approximately 2.5-mile elevated highway, which equals $240 million per mile. Using this estimate, a 15-mile facility would cost approximately $3.6 billion. As stated previously, providing a managed lane system in Honolulu is not comparable to the Tampa Bay toll facility that you reference.

Discussion of Comparison D) — Passenger Capacity:

Since the Draft EIS was published, the travel demand model has been refined by adding an updated air passenger model (which forecasts travel in the corridor related to passengers arriving or departing at Honolulu International Airport), defining more realistic drive access modes (driving alone or car pooling) to project stations and recognizing a more robust off-peak non-home-based direct demand element (trips that do not originate at home) based on travel surveys in Honolulu. These revisions were made based on consultation with FTA. As stated in Chapter 3 of the Final EIS, the travel demand forecasting model predicts a maximum peak direction volume of 14,700 passengers during the a.m. two-hour peak period. As a result of updated ridership forecasts, the operating plan for the fixed guideway system has been revised and the system will have a minimum capacity of approximately 17,300 passengers per direction during the two-hour peak period. The fixed guideway system is planned to operate with two- or three-car trains with a capacity of between 325 and 500 passengers each. At three-minute headways during the peak period, that provides capacity for approximately 8,650 passengers per peak direction per peak hour. This capacity figure applies in both directions for a total system capacity of approximately 17,300 passengers per peak hour. The full capacity of the fixed guideway with four-car trains and 90-second headways is over 25,000 passengers per hour per direction or over 50,000 passengers total. Accordingly, the fixed guideway system will provide sufficient capacity based on travel demand forecasting results.

The Managed Lane Alternative, including its potential capacity, was evaluated in the Alternatives Analysis. While the Managed Lane Alternative would reduce freeway congestion (measured as vehicle hours of delay), it would increase overall system congestion by inducing additional travelers to drive, which would result in increased congestion on arterial and collector facilities accessing the freeways and the managed lane. In addition, once a vehicle leaves the managed lane, that vehicle is subjected to congestion on surrounding roadways. This alternative was also less consistent with the Honolulu General Plan because it was less effective at supporting planned growth and development than the Fixed Guideway Transit Alternative.

Comparison G) — Traffic Congestion:

As stated in response to the comment above, the fixed guideway system would provide a peak minimum capacity of over 17,300 passengers during the two-hour peak period per direction. Should higher volumes be realized, the system is expandable to accommodate longer trains and to reduce the headways between trains from three minutes to 90 seconds resulting in an increase in capacity of more than 100 percent. Accordingly, the fixed guideway system will provide sufficient commuter capacity based on travel demand forecasting results.

Overall Conclusion and Recommendations:

As stated in Chapter 2 of the Final EIS, the Managed Lane Alternative was evaluated for its ability to meet project goals and objectives related to mobility and accessibility, supporting planned growth and economic development, constructability and cost, community and environmental quality, and planning consistency. The Managed Lane Alternative would fail to meet the Project's Purpose and Need, as described in Chapter 1 of this Final EIS, because it fails to moderate anticipated traffic congestion. While this alternative would have reduced congestion on parallel highways, system-wide traffic congestion would have been similar to the No Build Alternative as a result of increased traffic on arterials trying to access the facility. Total islandwide vehicle hours of delay would have increased with the Managed Lane Alternative compared to the No Build Alternative, indicating an increase in systemwide congestion (see Table 2-2 in the Final EIS). It also would be less effective than the Fixed Guideway Alternative at providing a faster and more reliable public transportation service as well as an alternative to private automobile travel. The Managed Lane Alternative would not have supported planned concentrated future population and employment growth because it would not provide concentrations of transit service that would serve as a nucleus for transit-oriented development.

After the Alternatives Analysis was completed, several scoping comments were received requesting reconsideration of the Managed Lane Alternative that was considered and rejected during the Alternatives Analysis. Because no new information was provided that would have changed the findings of the Alternatives Analysis regarding the Managed Lane Alternative, it was not included in the Draft EIS for further consideration.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
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Submission Date :	12/29/2008

Submission Content/Notes : 29 December, 2008

To:
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Subject: Comment on Draft Environmental Impact Statement (DEIS) "Honolulu High-capacity transit corridor Project", Issue : The DEIS shows Summary of Alternative Analysis Findings which contains inflated Capital cost for Managed Lane Alternative (MLA)

Fact:
DEIS Chapter 2, Table 2-1 shows a Summary of Alternative Analysis Findings including Type of alternative and Total Capital cost for each alternative:
Alternative Total Capital Cost
- 2030 No Build $600 million
- 2030 Transp. Sys. Mgmt $856 million
- 2030 Managed Lane (MLA) $3.6 to $4.7 Billion (two-lanes, 11 miles)
- 2020 Fixed Guideway $4.1 to $6.1 Billion (28 miles)

Discussion:
Table 2-1 shows total capital cost information for the Managed Lane Alternative (MLA) of $3.6 to $4.7 Billion or $327 Million to $427 million per mile over 11 miles.
The AA-assigned capital cost estimate for the Managed Lane Alternative (Two-lane elevated reversible hwy) is grossly incorrect based on several factors:
a) The Oahu Regional Transportation Plan (ORTP 2030) link http://oahumpo.org/ortp/ORTP2030/OMPO_Report_FINAL.pdf shows the State Project No. 52 - 2.2 mile Nimitz two-lane elevated flyover at $250 million (State DOT cost Estimate) or $113 million per mile.

b) The 10 mile Tampa three-lane elevated expressway http://www.tollroadsnews.com/node/172 cost $420 million or $42 million per mile.

c) The AA assigned cost estimate for the HOT reversible would conclude that the HOT would cost twice as much per lane mile as H-3, the most expensive highway because it had to bore two tunnels through the Koolaus.

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Conclusion: It is concluded that the AA-assigned capital cost estimate for the HOT reversible at $327 Million to $427 million per mile is grossly incorrect and that a three-lane reversible MLA is estimated to cost not more than $80 million per mile or $880 million for 11 miles from the H-1/H-2 merge to downtown Hotel Street.
Recommendation:
It is recommended that the DEIS show a revised lower cost for the Managed Lane Alternative (Elevated three-Lane reversible), including Table 2-1, as depicted in www.eng.hawaii.edu/~panos/UHCS.pdf. and that the MLA be reinstated into the DEIS for consideration as a viable Mass Transit Alternative.

Respectfully,

Ben Ramelb P.E.
1148 Ala Lilikoi St.
Honolulu HI 96818

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WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT10/09-336403

Mr. Ben Ramelb
1148 Ala Lilikoi Street
Honolulu, Hawaii 96818

Dear Mr. Ramelb:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal dated December 29, 2008 with subject [Comment on Draft Environmental Impact Statement (DEIS) "Honolulu High-capacity transit corridor Project", Issue: The DEIS shows Summary of Alternative Analysis Findings which contains inflated Capital cost for Managed Lane Alternative (MLA)]:

The analysis of the Managed Lane Alternative in Honolulu as shown in Table 5-1 in the Alternatives Analysis Report (DTS 2006b) shows the cost to be $2.6 billion in 2006 dollars (higher today) for construction, right-of-way, and contingencies associated with the 16-mile managed lane facility. The total capital cost of $3.6 billion in 2006 dollars for the Reversible Option includes the 2030 bus fleet, bus replacements prior to 2030, TheHandi-Van replacements, and bus facilities. As stated in the City Council's Transit Advisory Task Force Report dated December 14, 2006, a committee was charged with reviewing cost estimates for the two alternatives involving construction (the Managed Lane Alternative and Fixed Guideway Alternative). The report states that "the Task Force agrees with this committee that the Alternatives Analysis' construction cost estimates were fairly and consistently prepared, and that they may be used for both planning and cost comparisons." Information was obtained by the

Task Force from the Hawaii Department of Transportation and others familiar with managed lane facilities. It is the only estimate to date that addresses Honolulu conditions.

In response to the "Discussion" section of your letter:

a) The State of Hawaii's Highway Modernization Plan dated January 22, 2009, estimates the cost of the Nimitz Viaduct at $600 million for an approximately 2.5-mile elevated highway with two lanes, which equals $240 million per mile.

b) There is no substantiation of the estimate from the Tampa Bay toll facility being applicable in Honolulu. The designer of the Tampa Bay facility herself admitted that to apply such an estimate without detailed consideration of the many differences between the two locations is not reasonable. For clarification, the Tampa Bay elevated toll lanes extend only 5.8 miles within the 10-mile expressway. The costs quoted are from 2002, long before the costs of materials and construction rose dramatically after 2004. Furthermore, the corridor within which the Tampa Bay lanes are built required no right-of-way, had no significant utility conflicts, no major structures or crossings, and was built in much more favorable geotechnical conditions than exist on Oahu. In addition, the Transit Task Force Report dated December 14, 2006, states that "the committee concluded that the projects are sufficiently different (actual costs versus projected costs with contingencies; available, accessible ROW vs. construction in actively used highways; no utilities relocation vs. extensive relocations) as to make the comparison unreasonable."

c) According to construction cost indices prepared by the Washington State Department of Transportation, construction costs doubled between 1997 (the year construction ended on the H-3 Freeway) and 2006 (the year of the Alternatives Analysis). If construction of the H-3 Freeway had begun in 2006, that project would have cost approximately $2.6 billion. In addition, both the H-3 Freeway and the Managed Lane Alternative face unique situations that affect cost estimates. Construction of the Managed Lane Alternative would have occurred in a heavily developed corridor. As a result, there would be substantial disruptions to traffic and utilities, both of which add to the time, and thus cost, of a project. The H-3 Freeway was built in an undeveloped part of the island and which it had its own challenges, expensive traffic and utility disruptions were minimal.

d) The analysis of the Managed Lane Alternative from the Alternatives Analysis Report shows the cost to be $2.6 billion in 2006 dollars (higher today). As stated previously, the City Council's Transit Advisory Task Force Report states that "the Task Force agrees with this committee that the Alternatives Analysis' construction cost estimates were fairly and consistently prepared, and that they may be used for both planning and cost comparisons." As stated previously, the State of Hawaii's Highway Modernization Plan dated January 22, 2009, estimates the cost of the Nimitz Viaduct at $600 million for an approximately 2.5-mile elevated highway, which equals $240 million per mile. Using this estimate, a 15-mile facility would cost approximately $3.6 billion. As stated previously, providing a managed lane system in Honolulu is not comparable to the Tampa Bay toll facility that you reference.

In response to the "Recommendation" section of your letter:

As stated in Chapter 2 of the Final EIS, the Managed Lane Alternative was evaluated for its ability to meet project goals and objectives related to mobility and accessibility, supporting planned growth and economic development, constructability and cost, community and environmental quality, and planning consistency. The Managed Lane Alternative would fail to meet the Project's Purpose and Need, as described in Chapter 1 of this Final EIS, because it fails to moderate anticipated traffic congestion. While the Managed Lane Alternative would reduce freeway congestion (measured as vehicle hours of delay), it would increase overall system congestion by inducing additional travelers to drive, which would result in increased congestion on arterial and collector facilities accessing the freeways and the managed lane. In addition, once a vehicle leaves the managed lane, that vehicle is still subjected to congestion on surrounding roadways. Total islandwide vehicle hours of delay would have increased with the Managed Lane Alternative compared to the No Build Alternative, indicating an increase in system-wide congestion (see Table 2-2 in the Final EIS). It also would be less effective than the Fixed Guideway Alternative at providing a faster and more reliable public transportation service as well as an alternative to private automobile travel. The Managed Lane Alternative would not have supported planned concentrated future population and employment growth because it would not provide concentrations of transit service that would serve as a nucleus for transit-oriented development.

After the Alternatives Analysis was completed, several scoping comments were received requesting reconsideration of the Managed Lane Alternative that was considered and rejected during the Alternatives Analysis. Because no new information was provided that would have changed the findings of the Alternatives Analysis regarding the Managed Lane Alternative, it was not included in the Draft EIS for further consideration. The cost estimates shown in Table 2-2, Summary of Alternatives Analysis Findings, in the Final EIS have not been revised.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
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Submission Content/Notes : 29 December, 2008

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Subject: Comment on Draft Environmental Impact Statement (DEIS) "Honolulu High-capacity transit corridor Project", Issue : The DEIS must expand Mass transit alternatives for evaluation as required by law

Discussion: The Alternative Analysis and DEIS failed to provide "... an assessment of a wide range of public transportation alternatives ..." and/or "... sufficient information to enable the Secretary to make the findings of project justification ..." as required by statute.

Furthermore, the City, Parsons Brinkerhoff (PB) and the Federal Transit Authority failed to "Rigorously explore and objectively evaluate all reasonable alternatives," and "Devote substantial treatment to each alternative considered in detail including the proposed action so that reviewers may evaluate their comparative merits," as required by the Council on Environmental Quality (CEQ) Sec. 1502.14.

For example, the Managed Lane Alternative (MLA) in the Alternative Analysis (AA) established a capital cost estimate for 11 mile MLA two-lane reversible highway from Waikele to Iwilei at $2.57 Billion or $233 million per mile. The 2006 AA did not consider the fact that the Tampa three-lane, 10 mile, elevated expressway was built for $420 million or $42 million per mile. See Tampa http://www.tollroadsnews.com/node/172 . Had the city AA PB consultant reviewed the Tampa Reversible Expressway actual construction cost, the AA would have assigned a Capital cost estimate for the two-lane MLA at no more than $80 million per mile instead of $233 million per mile.
There are alternatives other than fixed guideway which the AA should have considered knowing that Mayor Mufi Hannemann have, for over two years, insisted that the people of West Oahu wanted traffic congestion on H-1 be solved and they wanted a solution NOW! The PB consultants should have identified the congestion problem from West and Central Oahu to be the two major "H-1 bottlenecks" which are at the H-1/H-2 merge and at the Middle Street merge. The PB consultants should then have identified transit alternatives to eliminate the two bottlenecks. Instead, PB proceeded to support the more expensive $6.0 + rail transit as the most cost effective transit solution. The final PB prepared AA indicates that the $6.+ Billion rail transit WORSENS the congestion at the two bottlenecks as shown on AA table 3-12 which shows that traffic OVERLOAD on H-1 after rail is built will increase from 1,500 vehicles per hour overload to 8,000 vph overload!
PB, with their expertise, should have had the ability to know that the first

low-cost alternative to eliminate the H-1 bottlenecks is to build a three-lane, three-mile elevated reversible "Nimitz HOV Flyover" from the Airport Viaduct/Keehi Lagoon Drive to downtown Hotel Street and Alakea Street. This Nimitz flyover will easily eliminate the Middle Street bottleneck for less than $300 million, details can be found in a 2008 study www.eng.hawaii.edu/~panos/UHCS.pdf. Furthermore, this project is identified as State Project as Number 52 in the Oahu Regional Transportation Plan (ORTP 2030) and a Final EIS was approved during the Ben Cayetano Administration.
PB could have also easily identified that a similar "Kamehameha Flyover", a 4-mile, three-lane elevated reversible HOV over Kamehameha Hwy median between the H-1/H-2 merge and the Airport Viaduct east of Aloha Stadium. This Kamehameha Flyover has the capacity to eliminate the H-1/H-2 traffic bottleneck because it would have 3 lanes of one-way HOV traffic during peak period. The capacity evaluation for the Kam flyover follows:
Numbers from Table 3-12 of city 2006 Nov Alternative Analysis ($10 million report):
Rail only: capacity = 6000 commuters per peak hour (equivalent 5000 vehicles per peak hour.)
H-1 only: rated capacity = 9,500 vehicles per hour (equivalent 15,400 commuters per hour
H-1 forecast yr 2030 traffic load = 17,500 vehicles per hour per City AA Table 3-12 (or 8,000 vph overload = 9,600 commuters per hour)

Managed Lane three-Lane HOV Reversible Kamehameha Flyover: capacity = 6,000 high occupancy vehicles per hour (equivalent 21,600 commuters per hour). Capacity based on HOV use on Kamehameha Flyover by 200 express buses per peak hour , car pools, van pools, green cars and HOV2. (50 pns per express bus and 5800 vph at avge 2 pns per vehicle).

Year 2030 commuter load by City AA Report = Rail (6000) + H-1 overload (9,600) + H-1 capacity (15,400) = 31,000 commuters.

2030 Load = 31,000 commuters per hour
Rail + H-1 = 21,400 commuters per hour
Managed Lane HOV + H-1 = 37,000 commuters per hour

Conclusion: Rail does not have sufficient commuter capacity which will cause 9,600 commuters to be stuck in gridlock on H-1 or stuck at rail stations (especially at stations between Waipahu and Kalihi). Managed Lane HOV Alternative will eliminate congestion and bottlenecks on H-1. The PB consultants should have been aware of the 10 mile Tampa three lane elevated, reversible expressway which was built and completed in year 2005 for $420 million or $42 million per mile! If the PB consultants applied a 100 percent escalation and geographic cost factor and increase the cost to $80 million per mile for the MLA evaluated in the Alternative Analysis, the cost for the 4 mile long Kamehameha Flyover (MLA reversible three lane) and 3 mile Nimitz Flyover (MLA reversible three lane) would have cost of $320 million and $240 million respectively, much lower than the $2.57 Billion assigned to the MLA alternative in the AA.

Conclusion:
The Alternative analysis is wrong in excluding the MLA for further consideration, due to capital cost issues, as a viable alternative for mass transit for the West Oahu Corridor.

Recommendation:
The DEIS must reinstate the MLA Alternative which is an 11 mile, three-lane elevated HOV transitway from the H-1/H-2 merge to Hotel Street and Alakea Street/Hafekauwila Street as described in www.eng.hawaii.edu/~panos/UHCS.pdf. The Managed Lane alternative should be considered as two options: HOT Lane and as a HOV hwy limited to HOV vehicles and "green cars – hybrid or electric vehicles".

Respectfully,

Ben Ramelb P.E.
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Honolulu HI 96818

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WAYNE Y. YOSHIOKA
DIRECTOR

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DEPUTY DIRECTOR

June 11, 2010

RT10/09-336410

Mr. Ben Ramelb
1148 Ala Lilikoi Street
Honolulu, Hawaii 96818

Dear Mr. Ramelb:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal dated December 29, 2008 with subject [Comment on Draft Environmental Impact Statement (DEIS) "Honolulu High-capacity transit corridor Project", Issue: The DEIS must expand Mass transit alternatives for evaluation as required by law]:

In response to the "Discussion" section of your letter, the Alternatives Analysis process, as documented in Chapter 2 of the Draft EIS, evaluated a broad range of transit mode and general alignment alternatives to provide improved mobility in the study corridor. An initial screening process considered alternatives identified through previous transit studies, a field review of the study corridor, an analysis of current population and employment data for the study corridor, a literature review of technology modes, work completed for the Oahu Regional Transportation Plan 2030 (ORTP) prepared by the Oahu Metropolitan Planning Organization (OahuMPO) (OahuMPO 2007), and public and agency comments received during the formal Alternatives Analysis scoping process.

During the fall of 2005 and winter of 2006, the City and County of Honolulu completed the alternatives screening process that is documented in the Honolulu High-Capacity Transit Corridor Project Alternatives Screening Memorandum *(DTS 2006a). Scoping meetings were held, which included a presentation of alternatives to the public and interested agencies and officials to receive comments on the Purpose and Need, Alternatives, and Scope of the analysis for the Alternatives Analysis. Refinements were made to alternatives.*

The scoping process in March of 2007 requested that the public propose alternatives that would satisfy the Purpose and Need at less cost or with greater effectiveness or less environmental or community impact and were not previously studied and eliminated for good cause. The only alternative proposed that met this criteria was Fixed Guideway Transit following an alternative alignment. All reasonable alternatives that have been identified and that satisfy the Purpose and Need at less cost or with greater effectiveness or less environmental or community impact and were not previously studied and eliminated for good cause have been evaluated in the Draft EIS.

The analysis of the Managed Lane Alternative from the Alternatives Analysis Report (DTS 2006b) shows the cost to be $2.6 billion in 2006 dollars (higher today) for a 16-mile facility. As stated in the City Council's Transit Advisory Task Force Report, a committee was charged with reviewing cost estimates for the two alternatives involving construction (the Managed Lane Alternative and Fixed Guideway Alternative). The report states that "the Task Force agrees with this committee that the Alternatives Analysis' construction cost estimates were fairly and consistently prepared, and that they may be used for both planning and cost comparisons." Information was obtained by the Task Force from the Hawaii Department of Transportation and others familiar with managed lane facilities. It is the only estimate to date that addresses Honolulu conditions.

There is no substantiation of the estimate from the Tampa Bay toll facility being applicable in Honolulu. The designer of the Tampa Bay facility herself admitted that to apply such an estimate without detailed consideration of the many differences between the two locations is not reasonable. For clarification, the Tampa Bay elevated toll lanes extend only 5.8 miles within the 10-mile expressway. The costs quoted are from 2002, long before the costs of materials and construction rose dramatically after 2004. Furthermore, the corridor within which the Tampa Bay lanes are built required no right-of-way, had no significant utility conflicts, no major structures or crossings, and was built in much more favorable geotechnical conditions than exist on Oahu. In addition, the Transit Task Force Report dated December 14, 2006, states that "the committee concluded that the projects are sufficiently different (actual costs versus projected costs with contingencies; available, accessible ROW vs. construction in actively used highways; no utilities relocation vs. extensive relocations) as to make the comparison unreasonable."

The Managed Lane Alternative was fully evaluated in the Alternatives Analysis. The Managed Lane Alternative would not eliminate congestion and bottlenecks on the H-1 Freeway. Table 3-12 in the Alternative Analysis shows that, under the No Build Alternative, there would be 18,049 vehicles per hour (vph) operating on the H-1 Freeway in 2030. Vehicle volumes rise to 18,327 vph (Two-direction Option) or 18,419 vph (Reversible Option) with the Managed Lane Alternative, while traffic volumes decrease to 17,209 vph with the 20-mile Fixed Guideway

Transit Alternative. Accordingly, the Fixed Guideway Transit Alternative will reduce traffic volumes from those projected under the 2030 No Build Alternative.

You are correct that the Nimitz Flyover is included in the Oahu Regional Transportation Plan and, accordingly, was included in the transportation modeling conducted for 2030 No Build and Project conditions. Effects of the Nimitz Flyover on traffic conditions in 2030 are discussed in Section 3.4.2 of the Final EIS. Travel on the Nimitz Flyover was included for the following travel pairs under the No Build Alternative: Kapolei to Downtown, Ewa to Downtown, and Mililani to Downtown. As shown in Figure 3-7 of the Final EIS, the Nimitz Flyover does improve transit travel times with the No Build Alternative between certain travel pairs (e.g., between Mililani and Downtown) compared to 2007 conditions. However, as also shown in this figure, travel times improve substantially more with the addition of the Project. In addition, the State of Hawaii's Highway Modernization Plan dated January 22, 2009, estimates the cost of the Nimitz Viaduct at $600 million for an approximately 2.5-mile elevated highway, which equals $240 million per mile.

While a bypass on either Nimitz Highway or Kamehameha Highway could reduce freeway congestion, it would increase overall system congestion by inducing additional travelers to drive, which would increase congestion on arterial and collector facilities accessing the freeways and the managed lane. In addition, once a vehicle leaves the managed lane, that vehicle is still subjected to congestion on surrounding roadways.

In response to your conclusion, since the Draft EIS was published, the travel demand model has been refined by adding an updated air passenger model (which forecasts travel in the corridor related to passengers arriving or departing at Honolulu International Airport), defining more realistic drive access modes (driving alone or car pooling) to project stations and recognizing a more robust off-peak non-home-based direct demand element (trips that do not originate at home) based on travel surveys in Honolulu. These revisions were made based on consultation with FTA. As stated in Chapter 3 of the Final EIS, the travel demand forecasting model predicts a maximum peak direction volume of 14,700 passengers during the a.m. two-hour peak period. As a result of updated ridership forecasts, the operating plan for the fixed guideway system has been revised and the system will have a minimum capacity of approximately 17,300 passengers per direction during the two-hour peak period. The fixed guideway system is planned to operate with two or three car trains with a capacity of between 325 and 500 passengers each. At three-minute headways during the peak period, that provides capacity for approximately 8,650 passengers per peak direction per peak hour. This capacity figure applies in both directions for a total system capacity of approximately 17,300 passengers per peak hour. The full capacity of the fixed guideway with four-car trains and 90-second headways is over 25,000 passengers per hour per direction or over 50,000 passengers total. Accordingly, the fixed guideway system will provide sufficient capacity based on travel demand forecasting results.

After the Alternatives Analysis was completed, several scoping comments were received requesting reconsideration of the Managed Lane Alternative that was considered and rejected during the Alternatives Analysis. Because no new information was provided that would have changed the findings of the Alternatives Analysis regarding the Managed Lane Alternative, it was not included in the Draft EIS for further consideration. The cost estimates shown in Table 2-2 in the Final EIS have not been revised.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
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Submission Date :	12/29/2008

Submission Content/Notes : 29 December, 2008

To:
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Subject: Comment on Draft Environmental Impact Statement (DEIS) "Honolulu High-capacity transit corridor Project", Issue The DEIS shows the Managed Lane Alternative (MLA) was rejected by the Alternative Analysis for unjustified reasons

Fact:
The DEIS Table 2-2 "Alternatives and Technologies Considered but rejected" states that the MLA was rejected by the Alternative analysis because "MLA would not have supported Honolulu General Plan; minimal impact to vehicle miles traveled and vehicles hours of delay"

Discussion:
1) A portion of the Honolulu General Plan is shown below and taken from : http://honoluludpp.org/planning/GeneralPlan/GPPreamble.pdf

"Purpose of the Honolulu General Plan -
The General Plan for the City and County of Honolulu is a written commitment by the City and County government to a future for the Island of Oahu which it considers desirable and attainable. The Plan is a statement of the long-range social, economic, environmental, and design objectives for the general welfare and prosperity of the people of Oahu and is a statement of broad policies which facilitate the attainment of the objectives of the Plan.
The General Plan is a guide for all levels of government, private enterprise, neighbor- hood and
citizen groups, organizations, and individual citizens in eleven areas of concern:
(1) population;
(2) economic activity;
(3) the natural environment;
(4) housing,
(5) transportation and utilities
(6) etc."

2) A 10 mile, elevated Managed Lane (reversible three lanes) was built in Tampa for $420 million or $42 million per mile. Evaluation of a similar 11 mile, three-lane reversible MLA on Oahu would cost $900 million (www.eng.hawaii.edu/~panos/UHCS.pdf) and would have the capability to eliminate the two major
H-1 traffic bottlenecks at H-1/H-2 merge and at the Middle Street merge. Elimination of the two major H-1 bottlenecks by the MLA would comply with the Honolulu General Plan as it relates to the General Plan

objective , "Transportation and Utilities". The Traffic Capacity Analysis below shows that the MLA will have the capacity to eliminate the bottlenecks while the rail does not. Conversely, the $6.0 Billion steel wheel fixed guideway alternative will cause a severe vehicular traffic overload at the two H-1 bottlenecks in the capacity analysis below and will not support the *Honolulu General Plan*.

3) Moreover, by removing the two major H-1 bottlenecks, the MLA would substantially reduce the "vehicle miles traveled and vehicles hours of delay" as compared with the steel wheel fixed guideway SINCE THE Fixed guideway would result in severe traffic overload on H-1 in year 2030 (see capacity analysis below).

4) The single, most important goal for mass transit is to eliminate or substantially reduce traffic congestion. The MLA meets this goal while the fixed guideway does not.

Mass Transit Options Traffic Capacity Analysis:

Numbers from Table 3-12 of city 2006 Nov Alternative Analysis ($10 million report):
Rail only: capacity = 6000 commuters per peak hour (equivalent 5000 vehicles per peak hour.)
H-1 only: rated capacity = 9,500 vehicles per hour (equivalent 15,400 commuters per hour
H-1 forecast yr 2030 traffic load = 17,500 vehicles per hour per City AA Table 3-12 (or 8,000 vph overload = 9,600 commuters per hour)

Managed Lane three-Lane HOV Reversible Kamehameha Flyover: capacity = 6,000 high occupancy vehicles per hour (equivalent 21,600 commuters per hour). Capacity based on HOV use on Kamehameha Flyover by 200 express buses per peak hour , car pools, van pools, green cars and HOV2. (50 pns per express bus and 5800 vph at avge 2 pns per vehicle).

Year 2030 commuter load by City AA Report = Rail (6000) + H-1 overload (9,600) + H-1 capacity (15,400) = 31,000 commuters.

2030 Load = 31,000 commuters per hour
Rail + H-1 = 21,400 commuters per hour
Managed Lane HOV + H-1 = 37,000 commuters per hour

Finding: Fixed Guideway does not have sufficient commuter capacity which will cause 9,600 commuters to be stuck in gridlock on H-1 or stuck at rail stations (especially at stations between Waipahu and Kalihi). Managed Lane Alternative (HOV) will eliminate congestion and bottlenecks on H-1.
Conclusion:
The Alternative Analysis is wrong by rejecting the MLA because when compared with the fixed guideway alternative, the MLA will remove H-1 Traffic bottlenecks and will support Honolulu Generel Plan and will substantially reduce vehicles miles traveled and substantially reduce vehicles hours of delay.

Recommendation:
It is recommended that a three-lane MLA be reinstated into the DEIS for further consideration as a viable mass transit locally preferred alternative (LPA).

Respectfully,

Ben Ramelb P.E.
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June 11, 2010

RT10/09-336411

Mr. Ben Ramelb
1148 Ala Lilikoi Street
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Dear Mr. Ramelb:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal dated December 29, 2008 with subject [Comment on Draft Environmental Impact Statement (DEIS) "Honolulu High-capacity transit corridor Project", Issue: The DEIS shows the Managed Lane Alternative (MLA) was rejected by the Alternative Analysis for unjustified reasons]:

In response to the "Discussion" section of your letter:

1) The General Plan language discussed in your letter is noted in Chapter 2 of the Final EIS.

2) There is no substantiation of the estimate from the Tampa Bay toll facility being applicable in Honolulu. The designer of the Tampa Bay facility herself admitted that to apply such an estimate without detailed consideration of the many differences between the two locations is not reasonable. For clarification, the Tampa Bay elevated toll lanes extend only 5.8 miles within the 10-mile expressway. The costs quoted are

from 2002, long before the costs of materials and construction rose dramatically after 2004. Furthermore, the corridor within which the Tampa Bay lanes are built required no right-of-way, had no significant utility conflicts, no major structures or crossings, and was built in much more favorable geotechnical conditions than exist on Oahu. In addition, the Transit Task Force Report dated December 14, 2006, states that "the committee concluded that the projects are sufficiently different (actual costs versus projected costs with contingencies; available, accessible ROW vs. construction in actively used highways; no utilities relocation vs. extensive relocations) as to make the comparison unreasonable." The $900 million estimate stated in your letter for the facility in Honolulu lacked the benefit of a full understanding of the circumstances, according to its author Linda Figg. The more acceptable estimate in the Alternatives Analysis Report (DTS 2006b) for a 16-mile facility was $2.6 billion, which has been vetted by the Hawaii Department of Transportation and other experts familiar with Honolulu.

The Managed Lane Alternative was fully evaluated in the Alternatives Analysis. The Managed Lane Alternative would not eliminate congestion and bottlenecks on the H-1 Freeway. Table 3-12 in the Alternative Analysis Report shows that, under the No Build Alternative, there would be 18,049 vehicles per hour (vph) operating on the H-1 Freeway in 2030. Vehicle volumes rise to 18,327 vph (Two-direction Option) or 18,419 vph (Reversible Option) with the Managed Lane Alternative, while traffic volumes decrease to 17,209 vph with the 20-mile Fixed Guideway Transit Alternative. Accordingly, the Fixed Guideway Transit Alternative will reduce traffic volumes from those projected under the 2030 No Build Alternative.

3) The Managed Lane Alternative would not have a substantial effect on vehicle miles traveled (VMT) or vehicle hours of delay (VHD), key metrics used to analyze transportation and environmental impacts. As stated in the response above, traffic on the H-1 Freeway would not improve with the Managed Lane Alternative. According to Table 3-12 from the Alternatives Analysis Report, the Two-direction Option for the Managed Lane Alternative would have a negligible impact on VMT and a slightly positive effect on VHD (4.3 percent). With the Fixed Guideway Transit Alternative, VMT and VHD would be reduced by 3.1 and 11 percent, respectively.

4) As stated previously, the fixed guideway system reduces congestion, as measured by VHD, while the Managed Lane Alternative does not. Since the Draft EIS was published, the travel demand model has been refined by adding an updated air passenger model (which forecasts travel in the corridor related to passengers arriving or departing at Honolulu International Airport), defining more realistic drive access modes (driving alone or car pooling) to project stations and recognizing a more robust off-peak non-home-based direct demand element (trips that do not originate at home) based on travel surveys in Honolulu. These revisions were made based on FTA direction. As stated in Chapter 3 of the Final EIS, the travel demand forecasting model predicts a maximum peak direction volume of 14,700 passengers during the a.m. two-hour peak period. As a result of updated ridership forecasts, the operating plan for the fixed guideway system has been revised, and the system will have a minimum capacity of approximately 17,300 passengers per direction during the two-hour peak period. The fixed guideway system is planned to operate with two or three car trains with a capacity of between 325 and 500 passengers each. At three-minute headways during the peak

period, that provides capacity for approximately 8,650 passengers per peak direction per peak hour. This capacity figure applies in both directions for a total system capacity of approximately 17,300 passengers per peak hour. The numbers presented in your comment understate the capacity of the fixed guideway by a substantial margin.

In addition, a major benefit of the fixed guideway is that once built, it is flexible enough to accommodate significant growth. For example, the full capacity of the fixed guideway with four-car trains and 90-second headways is over 25,000 passengers per hour per direction, or over 50,000 in total. Accordingly, the fixed guideway system will provide sufficient capacity based on travel demand forecasting results.

The fixed guideway will not affect the H-1 Freeway other than to reduce the demand for its use compared to what would happen if the fixed guideway were not built. As stated previously, the Fixed Guideway Transit Alternative will reduce traffic volumes from those projected under the 2030 No Build Alternative.

The conclusion drawn by the comment in favor of the Managed Lane Alternative is inconsistent with the findings of the Alternatives Analysis and the Draft EIS. The Managed Lane Alternative was eliminated following careful and thorough analysis over the two-year Alternatives Analysis process. After the Alternatives Analysis was completed, several scoping comments were received requesting reconsideration of the Managed Lane Alternative that was considered and rejected during the Alternatives Analysis. Because no new information was provided that would have changed the findings of the Alternatives Analysis regarding the Managed Lane Alternative, it was not included in the Draft EIS for further consideration. The cost estimates shown in Table 2-2 in the Final EIS have not been revised.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
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Submission Date :	12/29/2008

Submission Content/Notes : 29 December, 2008

To:
Mr. Wayne Yoshioka
Director Department of Transportation Services
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650 South King St. 3rd Floor
Honolulu
HI 96813
FAX: (808) 587-6080

Subject: Comment on Draft Environmental Impact Statement (DEIS) "Honolulu High-capacity transit corridor Project", Issue : The DEIS and Alternative Analysis lacks a wide range of alternatives

Discussion:
The Alternative Analysis and DEIS failed to provide "... an assessment of a wide range of public transportation alternatives ..." and/or "... sufficient information to enable the Secretary to make the findings of project justification ..." as required by statute.

In addition, we believe that you will find that the City, PB and FTA failed to, "Rigorously explore and objectively evaluate all reasonable alternatives," and "Devote substantial treatment to each alternative considered in detail including the proposed action so that reviewers may evaluate their comparative merits," as required by the Council on Environmental Quality (CEQ) Sec. 1502.14.

Four alternatives should be assessed:
1) BRT transit system as proposed by the Harris Administration. The BRT route downtown should be limited to King and Beretania Streets and exclude Dillingham Blvd and Kapiolani Blvd.
2) Managed Lane (reversible) as proposed by Professor Panos Prevedouros Study, "Transportation Alternatives Analysis for Mitigating Traffic Congestion between Leeward Oahu and Honolulu" which shows the 11 mile three-lane cost estimate to be $900 million which is in line with the $320 million Tampa three-lane reversible transitway.
3) Former mayoral candidate Ann Kobayashi's proposal for a 15 mile EzWay. See http://www.honoluluadvertiser.com/article/20081015/NEWS01/810150392/1001
4) Build two elevated highway bypasses around the H-1 bottlenecks at H-1/H-2 merge and at Middle St. merge. The bypasses include: a) a 4 mile, three-lane reversible elevated hwy over the Kamehameha Hwy median between the H-1/H-2 merge and the H-1 Viaduct at Aloha Stadium end b) a 3 mile, three-lane reversible elevated hwy over the Nimitz Hwy median between the H-1 Viaduct at Keehi Lagoon Drive and Hotel St/Alakea St./ Halekauwila St/Ala Moana Blvd. An on/off ramp to Waikamilo Rd from the Nimitz bypass would reduce the number of lanes from three to two between Waikamilo Rd and Iwilei. See attachment for more information on HOV Flyovers.

Recommendation: Include the above four alternatives in the DEIS.

Respectfully,

Ben Ramelb P.E.
1148 Ala Lilikoi St.
Honolulu Hi 96818

Copy to:
1) Mr. Ted Matley
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201 Mission St. Suite 1650
San Francisco, CA 94105
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2) Governor Linda Lingle
Hawaii State Capitol
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FAX (808) 586-0006

3) Honolulu City Council Members
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Attachment – Description of Nimitz and Kamehameha HOV Flyovers
Nimitz Flyover, Reversible HOV:
The Nimitz HOV Flyover is a 3-mile reversible, elevated, three-lane structure over the Nimitz Highway median from the Airport Viaduct at Keehi Lagoon to Hotel Street and Alakea St/Halekauwila St. The Flyover would be built similar to the Tampa Elevated three-lane Reversible HOV as described in-
http://www.tollroadsnews.com/node/172 .
One of the three lanes would exit the Flyover at Waikamilo Rd. to provide access to job centers in Kalihi, resulting in the Flyover having only two lanes entering downtown. The downtown terminal connections from the Nimitz HOV Flyover include an elevated busway from Iwilei to Hotel Street and a single lane underpass to both Alakea St/Halekauwila Streets. These connections are described in a Managed Lane Study "Transportation Alternatives Analysis for Mitigating Traffic congestion between Leeward Oahu and Honolulu". The full report is available at www.eng.hawaii.edu/~panos/UHCS.pdf.
The initial 2005 cost for the 10 mile Tampa Reversible was $320 million or $32 Million per highway mile, however, a geotechnical design error increased the cost to $420 million or $42 million per mile. Using a geographic and escalation factor of 100 percent, the 3-mile Nimitz HOV Flyover at $60 to $80 million per mile would cost $180 million to $240 million.
The "Nimitz Flyover" has an approved Final Environmental Impact Statement which allows for early construction.

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The Kamehameha Flyover would be connected to H-1, H-2, Kamehameha Highway and Farrington Highway at the west end and to the Airport Viaduct at the east end. These connections are described in a Managed Lane Study "Transportation Alternatives Analysis for Mitigating Traffic congestion between Leeward Oahu and Honolulu". The full report is available at www.eng.hawaii.edu/~panos/UHCS.pdf.

The initial 2005 cost for the 10 mile Tampa Reversible was $320 million or $32 Million per highway mile, however, a geotechnical design error increased the cost to $420 million or $42 million per mile. Using a geographic and escalation factor of 100 percent, the 4-mile Kamehameha HOV Flyover at $60 to $80 million per mile would cost between $240 million to $320 million.

The Draft Environmental Impact Statement (DEIS) - Honolulu High-Capacity Transit Corridor Project Nov 2008 , shows the rail route over Kamehameha Highway between Pearl City and Aloha Stadium which could conflict with the proposed three-lane "Kamehameha Flyover" route outlined above. If the rail is built, it is suggested that both the Kamehameha Highway "Flyover" and the Rail be built within the elevated Kamehameha Highway corridor. In this case, only a two-lane "Kamehameha Flyover" is needed (instead of three-lanes) to be built alongside and parallel to the Rail transit. The rail with a capacity of 8,000 commuters per hour and the two-lane "Kamehameha Flyover", with a capacity of 4,000 vehicles per hour, should be adequate to substantially reduce the bottleneck at the H-1/H-2 merge and the traffic congestion on H-1 between Pearl City and Aloha Stadium.

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT10/09-336412

Mr. Ben Ramelb
1148 Ala Lilikoi Street
Honolulu, Hawaii 96818

Dear Mr. Ramelb:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal dated December 29, 2008, with subject [Comment on Draft Environmental Impact Statement (DEIS) "Honolulu High-capacity transit corridor Project", Issue: The DEIS and Alternative Analysis lacks a wide range of alternatives]:

In response to the "Discussion" section of your letter, Chapter 2 of the Final EIS summarizes the alternatives screening and selection process. Beginning in the fall of 2005, an initial screening process considered alternatives identified through previous transit studies, a field review of the study corridor, an analysis of current population and employment data for the study corridor, a literature review of technology modes, ongoing work completed as part of the Oahu Regional Transportation Plan 2030 (ORTP) prepared by the Oahu Metropolitan Planning Organization (OahuMPO) (OahuMPO 2007), and public and agency comments received during the formal Alternatives Analysis scoping process.

The screening process is documented in the Honolulu High-Capacity Transit Corridor Project Alternatives Screening Memorandum (DTS 2006a). Three scoping meetings were held during the screening process in December 2005, which included a presentation of initial alternatives to the public, interested agencies, and officials to receive comments on the Purpose and Need, alternatives, and scope of the Alternatives Analysis. Refinements were made to the alternatives based on the public input during scoping.

After completion of screening in the winter of 2006, the following alternatives were studied in the Alternatives Analysis: No Build Alternative, Transportation System Management (TSM) Alternative, Managed Lane Alternative, and the Fixed Guideway Alternative. After review of the Alternatives Analysis Report and consideration of public comments, the City Council identified a fixed guideway transit system extending from Kapolei to UH Manoa with a connection to Waikiki as the Locally Preferred Alternative. This identification, which eliminated the TSM and Managed Lane Alternatives from further consideration, became Ordinance 07-001 on January 6, 2007. The NEPA process considered a range of alternatives that was consistent with the identified Locally Preferred Alternative. As discussed in Section 2.2, there were no alternatives that had not been previously studied and eliminated for good cause that would satisfy the Purpose and Need at less cost, with greater effectiveness, or less environmental or community impact.

1) As stated in Chapter 2 of the Final EIS, prior to selecting an elevated fixed guideway system, a variety of high-capacity transit options were evaluated during the Primary Corridor Transportation Project (1998-2002) and Alternatives Analysis. Options evaluated and rejected include an exclusively at-grade fixed-guideway system using bus rapid transit vehicles. In addition to comments received during the Alternatives Analysis and EIS scoping sessions, these studies provided a critical foundation for the conclusion that an elevated system would result in the best overall performance and better support of the Purpose and Need for the Project. In addition, the proposed Bus Rapid Transit Alternative, as stated in your letter, is a variation of the Transportation System Management Alternative that was evaluated in the Alternatives Analysis. While this alternative has merit for cost-effectiveness, its overall system benefit would be very low.

2) The analysis of the Managed Lane Alternative in Honolulu from the Alternatives Analysis Report (DTS 2006b) shows the cost to be $2.6 billion in 2006 dollars (higher today) for a 16-mile facility. As stated in the City Council's Transit Advisory Task Force Report, a committee was charged with reviewing cost estimates for the two alternatives involving construction (the Managed Lane Alternative and Fixed Guideway Alternative). The report states that "the Task Force agrees with this committee that the Alternatives Analysis' construction cost estimates were fairly and consistently prepared, and that they may be used for both planning and cost comparisons." Information was obtained by the Task Force from the Hawaii Department of Transportation and others familiar with managed lane facilities. It is the only estimate to date that addresses Honolulu conditions.

There is no substantiation of the estimate from the Tampa Bay toll facility being applicable in Honolulu. The designer of the Tampa Bay facility herself admitted that to apply such an estimate without detailed consideration of the many differences between the two locations is not reasonable. For clarification, the Tampa Bay elevated toll lanes extend only 5.8

miles within the 10-mile expressway. The costs quoted are from 2002, long before the costs of materials and construction rose dramatically after 2004. Furthermore, the corridor within which the Tampa Bay lanes are built required no right-of-way, had no significant utility conflicts, no major structures or crossings, and was built in much more favorable geotechnical conditions than exist on Oahu. In addition, the Transit Task Force Report dated December 14, 2006, states that "the committee concluded that the projects are sufficiently different (actual costs versus projected costs with contingencies; available, accessible ROW vs. construction in actively used highways; no utilities relocation vs. extensive relocations) as to make the comparison unreasonable."

3) The EzWay 15-mile, three-lane viaduct concept was developed as a hybrid of a plan for elevated toll lanes and some form of rubber-tire-on-concrete transit system. It is similar to the Managed Lane Alternative that was thoroughly evaluated in the Alternatives Analysis, which also accommodated both single occupant and transit vehicles. No known cost estimate for the EzWay proposal was prepared or validated by a qualified registered Professional Engineer. As a point of reference, the State of Hawaii's Highway Modernization Plan dated January 22, 2009, estimates the cost of the Nimitz Viaduct at $600 million for an approximately 2.5-mile elevated highway with two lanes, which equals $240 million per mile. Using this estimate, a 15-mile facility would cost approximately $3.6 billion.

4) Localized bypasses would not meet system goals for corridor-wide benefits to mobility, reliability, access, and equity. The Hawaii Department of Transportation, which is responsible for the freeway system, has evaluated needs for the freeway system and identified the highway projects that would be most efficient at reducing congestion on Oahu. The projects, including a Nimitz Flyover, are listed in Table 2-3 of the Draft EIS and included in the analysis for all project alternatives. Effects of the Nimitz Flyover on traffic conditions in 2030 are discussed in Section 3.4.2 of the Final EIS. Travel on the Nimitz Flyover was included for the following travel pairs under the No Build Alternative: Kapolei to Downtown, Ewa to Downtown, and Mililani to Downtown. As shown in Figure 3-7 of the Final EIS, the Nimitz Flyover does improve transit travel times with the No Build Alternative between certain travel pairs (e.g., between Mililani and Downtown) compared to 2007 conditions. However, as also shown in this figure, travel times improve substantially more with the addition of the Project. As a point of clarification, a Final EIS was never prepared for the Nimitz Flyover.

There could be many other versions of this type of system with minor adaptations to suit one or another special concern. In the end, the above approaches all have similar challenges as a primary solution to Honolulu's transportation problems. They do not reduce congestion, increase the reliability of the transportation system, serve future land use plans, or improve the fairness of and access to the transportation system. While the Managed Lane Alternative would reduce freeway congestion (measured as vehicle hours of delay), it would increase overall system congestion by inducing additional travelers to drive, which would result in increased congestion on arterial and collector facilities accessing the freeways and the managed lane. In addition, once a vehicle leaves the managed lane, that vehicle is still subjected to congestion on surrounding roadways. They also do not offer an alternative to perpetuating a reliance on limited existing travel modes. For example, localized bypasses would not meet system goals for corridor-wide benefits to mobility, reliability, access, and equity. In sum, they do not address the Purpose and Need of the Project.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
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Submission Date :	12/29/2008

Submission Content/Notes : 29 December, 2008

To:
Mr. Wayne Yoshioka
Director Department of Transportation Services
City and County of Honolulu
650 South King St. 3rd Floor
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HI 96813
FAX: (808) 587-6080

Subject: Comment on Draft Environmental Impact Statement (DEIS) "Honolulu High-capacity transit corridor Project", Issue : The Alternative Analysis evaluation of the Managed Lane Alternative was flawed which caused the MLA to be excluded from further consideration in the DEIS

Discussion:
The Alternative Analysis rigged the specifications and analysis of the Managed Lane Alternative . DEIS Chapter 2 summarizes alternatives considered for the Honolulu High-Capacity Transit Corridor Project. The alternatives considered were chosen primarily by the Alternative Analysis published in 2006.

The AA was flawed because it failed to include several transit alternatives, each with a capability to substantially reduce or eliminate the traffic congestion bottlenecks on H-1 at Pearl City and Middle St. merge in year 2030. As shown on Table 3-12 of the AA and DEIS Table 3-12, all rail alternatives result in worse traffic congestion on H-1 AFTER any rail alternative is built and operating.

The fact that rail will worsen congestion on H-1 after spending a minimum of $6.2 Billion for the Rail alternative, it is totally unacceptable to the Oahu taxpayer to continue to face worse traffic congestion on H-1. The single and most important reason for building a "mass transit system" is to substantially reduce or eliminate traffic congestion". The AA and DEIS fails to include this most important purpose and need for mass transit and therefore the AA and DEIS must be revised to include, as a need, to substantially reduce or eliminate traffic congestion.

Accordingly, as a minimum, the DEIS should include the following four additional alternatives for assessment on environmental impact:

1) BRT transit system as proposed by the Harris Administration. The BRT route downtown should be limited to King and Beretania Streets which can accommodate a BRT system and exclude Dillingham Blvd and Kapiolani Blvd which are too narrow to accommodate a BRT system.
2) Managed Lane (reversible) as proposed by Professor Panos Prevedouros Study, "Transportation Alternatives Analysis for Mitigating Traffic Congestion between Leeward Oahu and Honolulu" published March 2008, which shows the 11 mile three-lane cost estimate to be $900 million which is in line with the $320 million Tampa threa-lane reversible transit way.

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4) Build two elevated highway bypasses around the H-1 bottlenecks at H-1/H-2 merge and at Middle St. merge. The bypasses include: a) a 4 mile, three-lane reversible elevated hwy over the Kamehameha Hwy median between the H-1/H-2 merge and the H-1 Viaduct at Aloha Stadium and b) a 3 mile, three-lane reversible elevated hwy over the Nimitz Hwy median between the H-1 Viaduct at Keehi Lagoon Drive and Hotel St/Alakea St./ Halekauwila St/Ala Moana Blvd. An on/off ramp to Waikamilo Rd from the Nimitz bypass would reduce the number of lanes from three to two between Waikamilo Rd and Iwilei. See attachment for more information on HOV Flyovers.

Recommendation: Include the above four alternatives in the DEIS.

Respectfully,

Ben Ramelb P.E.
1148 Ala Lilikoi St.
Honolulu HI 96818

Copy to:
1) Mr. Ted Matley
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2) Governor Linda Lingle
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Attachment – Description of Nimitz and Kamehameha HOV Flyovers

Nimitz Flyover, Reversible HOV:

The Nimitz HOV Flyover is a 3-mile reversible, elevated, three-lane structure over the Nimitz Highway median from the Airport Viaduct at Keehi Lagoon to Hotel Street and Alakea St/Halekauwila St. The Flyover would be built similar to the Tampa Elevated three-lane Reversible HOV as described in- http://www.tollroadsnews.com/node/172 .

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from the Nimitz HOV Flyover include an elevated busway from Iwilei to Hotel Street and a single lane underpass to both Alakea St/Halekauwila Streets. These connections are described in a Managed Lane Study "Transportation Alternatives Analysis for Mitigating Traffic congestion between Leeward Oahu and Honolulu". The full report is available at www.eng.hawaii.edu/~panos/UHCS.pdf.
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DEPARTMENT OF TRANSPORTATION SERVICES

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DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT10/09-336443

Mr. Ben Ramelb
1148 Ala Lilikoi Street
Honolulu, Hawaii 96818

Dear Mr. Ramelb:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

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The screening process is documented in the Honolulu High-Capacity Transit Corridor Project Alternatives Screening Memorandum (DTS 2006a). Three scoping meetings were held during the screening process in December 2005, which included a presentation of initial

alternatives to the public, interested agencies, and officials to receive comments on the Purpose and Need, alternatives, and scope of the Alternatives Analysis. Refinements were made to the alternatives based on the public input during scoping.

After completion of screening in the winter of 2006, the following alternatives were studied in the Alternatives Analysis: No Build Alternative, Transportation System Management (TSM) Alternative, Managed Lane Alternative, and the Fixed Guideway Alternative. After review of the Alternatives Analysis Report and consideration of public comments, the City Council identified a fixed guideway transit system extending from Kapolei to UH Manoa with a connection to Waikiki as the Locally Preferred Alternative. This identification, which eliminated the TSM and Managed Lane Alternatives from further consideration, became Ordinance 07-001 on January 6, 2007. The NEPA process considered a range of alternatives that was consistent with the identified Locally Preferred Alternative. As discussed in Section 2.2, there were no alternatives that had not been previously studied and eliminated for good cause that would satisfy the Purpose and Need at less cost, with greater effectiveness, or less environmental or community impact. In addition, the City Council's Transit Advisory Task Force reviewed the Alternatives Analysis. The Task Force concluded in its report dated December 14, 2006, that the assessment of each alternative was "fair and accurate."

The Managed Lane Alternative was fully evaluated in the Alternatives Analysis. The Managed Lane Alternative would not eliminate congestion and bottlenecks on the H-1 Freeway. Table 3-12 in the Alternative Analysis Report shows that, under the No Build Alternative, there would be 18,049 vehicles per hour (vph) operating on the H-1 Freeway in 2030. Vehicle volumes rise to 18,327 vph (two-direction option) or 18,419 vph (reversible option) with the Managed Lane Alternative, while traffic volumes decrease to 17,209 vph with the 20-mile Fixed Guideway Transit Alternative. Accordingly, the Fixed Guideway Transit Alternative will reduce traffic volumes from those projected under the 2030 No Build Alternative.

The Managed Lane Alternative would not have a substantial effect on vehicle miles traveled (VMT) or vehicle hours of delay (VHD), key metrics used to analyze transportation and environmental impacts. As stated in the response above, traffic on the H-1 Freeway would not improve with the Managed Lane Alternative. According to Table 3-12 from the Alternatives Analysis Report, the Two-direction Option for the Managed Lane Alternative would have a negligible impact on VMT and a slightly positive effect on VHD (4.3 percent). With the Fixed Guideway Transit Alternative, VMT and VHD would be reduced by 3.1 and 11 percent, respectively. As shown in Table 6-1 of the Final EIS, the Project will cost $4.6 billion in 2009 dollars and $5.5 billion in inflated dollars, including finance charges. Project goals and objectives are discussed in Section 1.8 of the Final EIS. Section 1.8.1 in the Final EIS states that transit improvements are needed to "improve corridor mobility." This section explains that, "Currently, motorists traveling from West Oahu to Downtown experience highly congested traffic during the a.m. peak period. By 2030, after including all the planned roadway improvements in the ORTP, the level of congestion and travel time are projected to increase further.... Expansion of the roadway system between Kapolei and UH Manoa is constrained by physical barriers and by dense urban neighborhoods that abut many existing roadways. Given current and increasing levels of congestion, an alternative method of travel is needed within the study corridor independent of current and projected highway congestion."

1) As stated in Chapter 2 of the Final EIS, prior to selecting an elevated fixed guideway system, a variety of high-capacity transit options were evaluated during the

Primary Corridor Transportation Project (1998-2002) and Alternatives Analysis. Options evaluated and rejected include an exclusively at-grade fixed guideway system using bus rapid transit vehicles. In addition to comments received during the Alternatives Analysis and EIS scoping sessions, these studies provided a critical foundation for the conclusion that an elevated system would result in the best overall performance and better support of the Purpose and Need for the Project. In addition, the proposed Bus Rapid Transit Alternative, as stated in your letter, is a variation of the Transportation System Management Alternative that was evaluated in the Alternatives Analysis. While this alternative has merit for cost-effectiveness, its overall system benefit would be very low.

2) The analysis of the Managed Lane Alternative from the Alternatives Analysis Report (DTS 2006b) shows the cost to be $2.6 billion in 2006 dollars (higher today) for a 16-mile facility. As stated in the City Council's Transit Advisory Task Force Report, a committee was charged with reviewing cost estimates for the two alternatives involving construction (Managed Lane Alternative and Fixed Guideway Alternative). The report states that "the Task Force agrees with this committee that the Alternatives Analysis' construction cost estimates were fairly and consistently prepared, and that they may be used for both planning and cost comparisons." Information was obtained by the Task Force from the Hawaii Department of Transportation and others familiar with managed lane facilities. It is the only estimate to date that addresses Honolulu conditions.

There is no substantiation of the estimate from the Tampa Bay toll facility being applicable in Honolulu. The designer of the Tampa Bay facility herself admitted that to apply such an estimate without detailed consideration of the many differences between the two locations is not reasonable. For clarification, the Tampa Bay elevated toll lanes extend only 5.8 miles within the 10-mile expressway. The costs quoted are from 2002, long before the costs of materials and construction rose dramatically after 2004. Furthermore, the corridor within which the Tampa Bay lanes are built required no right-of-way, had no significant utility conflicts, no major structures or crossings, and was built in much more favorable geotechnical conditions than exist on Oahu. In addition, the Transit Task Force Report dated December 14, 2006, states that "the committee concluded that the projects are sufficiently different (actual costs versus projected costs with contingencies; available, accessible ROW vs. construction in actively used highways; no utilities relocation vs. extensive relocations) as to make the comparison unreasonable."

3) The EzWay 15-mile, three-lane viaduct concept was developed as a hybrid of a plan for elevated toll lanes and some form of rubber-tire-on-concrete transit system. It is similar to the Managed Lane Alternative that was thoroughly evaluated in the Alternatives Analysis, which also accommodated both single occupant and transit vehicles. No known cost estimate for the EzWay proposal was prepared or validated by a qualified registered professional engineer. As a point of reference, the State of Hawaii's Highway Modernization Plan dated January 22, 2009, estimates the cost of the Nimitz Viaduct at $600 million for an approximately 2.5-mile elevated highway with two lanes, which equals $240 million per mile. Using this estimate, a 15-mile facility would cost approximately $3.6 billion.

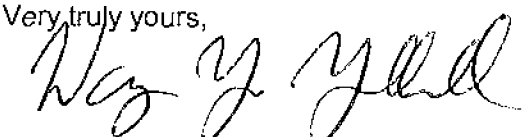
4) Localized bypasses would not meet system goals for corridor-wide benefits to mobility, reliability, access, and equity. The Hawaii Department of Transportation, which

is responsible for the freeway system, has evaluated needs for the freeway system and identified the highway projects that would be most efficient at reducing congestion on Oahu. The projects, including a Nimitz Flyover, are listed in Table 2-3 of the Draft EIS and included in the analysis for all project alternatives. Effects of the Nimitz Flyover on traffic conditions in 2030 are discussed in Section 3.4.2 of the Final EIS. Travel on the Nimitz Flyover was included for the following travel pairs under the No Build Alternative: Kapolei to Downtown, Ewa to Downtown, and Mililani to Downtown. As shown in Figure 3-7 of the Final EIS, the Nimitz Flyover does improve transit travel times with the No Build Alternative between certain travel pairs (e.g., between Mililani and Downtown) compared to 2007 conditions. However, as also shown in this figure, travel times improve substantially more with the addition of the Project. As a point of clarification, a Final EIS was never prepared for the Nimitz Flyover.

There could be many other versions of this type of system with minor adaptations to suit one or another special concern. In the end, the above approaches all have similar challenges as a primary solution to Honolulu's transportation problems. They do not reduce congestion, increase the reliability of the transportation system, serve future land use plans, or improve the fairness of and access to the transportation system. While the Managed Lane Alternative would reduce freeway congestion (measured as vehicle hours of delay), it would increase overall system congestion by inducing additional travelers to drive, which would result in increased congestion on arterial and collector facilities accessing the freeways and the managed lane. In addition, once a vehicle leaves the managed lane, that vehicle is still subjected to congestion on surrounding roadways. They also do not offer an alternative to perpetuating a reliance on limited existing travel modes. For example, localized bypasses would not meet system goals for corridor-wide benefits to mobility, reliability, access, and equity. In sum, they do not address the Purpose and Need of the Project.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,



WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
Creation Date :	12/29/2008
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First Name :	Ben
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Submission Method :	Website
Other Submission Method :	
Submission Date :	12/29/2008

Submission Content/Notes : 29 December, 2008

To:
Mr. Wayne Yoshioka
Director Department of Transportation Services
City and County of Honolulu
650 South King St. 3rd Floor
Honolulu
HI 96813
FAX: (808) 587-6080

Subject: Comment on Draft Environmental Impact Statement (DEIS) "Honolulu High-capacity transit corridor Project", Issue : City Alternative Analysis (AA) incorrectly inflates Managed Lane Alternative (MLA) cost of $2.6 Billion which wrongly excludes MLA from further transit consideration in the DEIS

Facts:
1) 2006 Alternative Analysis show 14 mile, two lane elevated MLA capital cost at $2.6 Billion or $185 Million per mile.
2) AA shows 20 mile Rail to Ala Moana Shopping Center cost at $3.7 Billion or $180 million per mile.
3) Wayne Yoshioka, on Olelo 22 July 2008, 19 minutes into video, http://www.honolulutransit.org/video/?id=9, stated " $3.7 Billion includes $1.0 Billion contingency". Thus the 20 mile Rail cost estimate, without contingency, is $2.7 Billion or $135 million per mile.
4) The Rail project includes 180 + land acquisitions, 20 miles elevated structure, nineteen, four-story or higher rail stations., electric substations at each rail station, steel rails and the heavy copper lines to convey the high electrical load, escalators, elevators, and office/bathrooms/roadways/parking facilities at each rail station. Conversely, the MLA will have zero rail stations on the entire 11 mile length.
5) The ORTP 2030 link http://oahumpo.org/ortp/ORTP2030/OMPO_Report_FINAL.pdf Shows the 2.2 mile Nimitz two lane elevated flyover at $250 million (State DOT cost Estimate) or $113 million per mile.
6) The 10 mile Tampa three-lane elevated http://www.tollroadsnews.com/node/172 cost $420 million or $42 million per mile.
7) The MLA would cost twice as much per lane mile as H-3, the most expensive highway because it had to bore two tunnels through the Koolaus.
8) Professor Panos Prevedouros study "Transportation Alternative Analysis for Mitigating traffic Congestion between Leeward Oahu and Honolulu" March 2008, shows a cost estimate for a three lane, 11 mile elevated Managed Lane for $900 million or $81 million per mile. The Managed Lane facility is similar in construction to the Tampa three lane elevated reversible. The full report is available at www.eng.hawaii.edu/~panos/UHCS.pdf.

Discussion:

a) The city AA discarded the MLA because of high cost and that it would not solve traffic congestion.
b) The DEIS does not include the MLA because it was discarded by the AA from further consideration.
c) The cost estimates above show that the MLA would cost not more than $900 million based on the similar Tampa three lane reversible. Even is the MLA were to use the State of Hawaii's estimate in the ORTP, the 11 mile MLA would cost $113 million per mile or $1.2 Billion.
d) If the two lane elevated MLA uses the elevated rail cost at $135 million per mile, the MLA would cost $1.5 Billion, far less than the AA estimate of $2.6 Billion.

Conclusion:
The AA cost estimate for the MLA at $2.6 Billion is incorrect and should be revised to less than $1.0 Billion. Further, the MLA should be restudied within the DEIS process if the DEIS is to comply with NEPA.

Recommendation:
It is recommended that the Council on Environmental Quality (CEQ), in conjunction with the USDOT, require the FTA and the CITY re-assess the MLA in the EIS process. City and FTA re-study the MLA as an 11 mile, three-lane elevated reversible transit way within the DEIS process if the DEIS is to comply with NEPA.

Respectfully,

Ben Ramelb P.E.
1148 Ala Lilikoi St
Honolulu, HI
968

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2) Governor Linda Lingle
Hawaii State Capitol
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DEPARTMENT OF TRANSPORTATION SERVICES

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT10/09-336447

Mr. Ben Ramelb
1148 Ala Lilikoi Street
Honolulu, Hawaii 96818

Dear Mr. Ramelb:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal dated December 29, 2008 with subject [Comment on Draft Environmental Impact Statement (DEIS) "Honolulu High-capacity transit corridor Project", Issue : City Alternative Analysis (AA) incorrectly inflates Managed Lane Alternative (MLA) cost of $2.6 Billion which wrongly excludes MLA from further transit consideration in the DEIS]:

In response to "Fact 1" in your letter, the Alternatives Analysis showed a 16-mile, two-lane elevated Managed Lane Alternative at $2.6 billion. Regarding "Fact 2-4", the financial plan has been revised for the Final EIS and is summarized in Chapter 6 of the Final EIS. Table 6-1 of the Final EIS shows the capital cost breakdown for the system, including contingency and right-of-way acquisitions. Both the Managed Lane Alternative and the Fixed Guideway Alternative have right-of way-acquisitions.

Regarding "Fact 5", the State of Hawaii's Highway Modernization Plan dated January 22, 2009, estimates the cost of the Nimitz Viaduct at $600 million for an approximately 2.5-mile elevated highway with two lanes, which equals $240 million per mile. Using this estimate, a 15-mile facility would cost approximately $3.6 billion. Regarding "Fact 6", there is no substantiation of the estimate from the Tampa Bay toll facility being applicable in Honolulu. The designer of the

Tampa Bay facility herself admitted that to apply such an estimate without detailed consideration of the many differences between the two locations is not reasonable. For clarification, the Tampa Bay elevated toll lanes extend only 5.8 miles within the 10-mile expressway. The costs quoted are from 2002, long before the costs of materials and construction rose dramatically after 2004. Furthermore, the corridor within which the Tampa Bay lanes are built required no right-of-way, had no significant utility conflicts, no major structures or crossings, and was built in much more favorable geotechnical conditions than exist on Oahu. In addition, the Transit Task Force Report dated December 14, 2006, states that "the committee concluded that the projects are sufficiently different (actual costs versus projected costs with contingencies; available, accessible ROW vs. construction in actively used highways; no utilities relocation vs. extensive relocations) as to make the comparison unreasonable."

Regarding "Fact 7", according to construction cost indices prepared by the Washington State Department of Transportation, construction costs doubled between 1997 (the year construction ended on the H-3 Freeway) and 2006 (the year of the Alternatives Analysis). If construction of the H-3 Freeway had begun in 2006, that project would have cost approximately $2.6 billion. In addition, both the H-3 Freeway and the Managed Lane Alternative face unique situations that affect cost estimates. Construction of the Managed Lane Alternative would have occurred in a heavily developed corridor. As a result, there would be substantial disruptions to traffic and utilities, both of which add to the time, and thus cost, of a project. The H-3 Freeway was built in an undeveloped part of the island and which it had its own challenges, expensive traffic and utility disruptions were minimal.

Regarding "Fact 8", the analysis of the Managed Lane Alternative from the Alternatives Analysis Report (DTS 2006b) shows the cost to be $2.6 billion in 2006 dollars (higher today) for a 16-mile facility. As stated in the City Council's Transit Advisory Task Force Report, a committee was charged with reviewing cost estimates for the two alternatives involving construction (the Managed Lane Alternative and Fixed Guideway Alternative). The report states that "the Task Force agrees with this committee that the Alternatives Analysis' construction cost estimates were fairly and consistently prepared, and that they may be used for both planning and cost comparisons." Information was obtained by the Task Force from the Hawaii Department of Transportation and others familiar with managed lane facilities. It is the only estimate to date that addresses Honolulu conditions.

To address your discussion points:

a) The Alternatives Analysis fully evaluated the Managed Lane Alternative and documented that it did not perform as well as the Fixed Guideway Transit Alternative under a broad range of metrics, as summarized in Chapter 2 of the Final EIS. As stated in this chapter and in the Summary of the Alternatives Analysis Report, of all the alternatives evaluated, the Managed Lane Alternative would have generated the greatest amount of air pollution, required the greatest amount of energy for transportation use, and would have resulted in the largest number of transportation noise impacts. Because the Managed Lane Alternative would have served a shorter portion of the study corridor, it would have resulted in fewer displacements and would have affected fewer archaeological, cultural, and historic resources than the Fixed Guideway Transit Alternative. The Managed Lane Alternative would not have affected any farmlands. Visually, the elevated structure would have extended a shorter distance, but it would have been more visually intrusive because its elevated structure would have been much

wider than that of the Fixed Guideway Transit Alternative. It would have provided little community benefit, as it would not have resulted in substantially improved transit access in the corridor. Lastly, no funding sources were identified for the Managed Lane Alternative.

b) After the Alternatives Analysis was completed, several scoping comments were received requesting reconsideration of the Managed Lane Alternative that was considered and rejected during the Alternatives Analysis. Because no new information was provided that would have changed the findings of the Alternatives Analysis regarding the Managed Lane Alternative, it was not included in the Draft EIS for further consideration.

c and d) The engineering cost estimate for a two-lane reversible managed lane facility, which was calculated following the same rigorous cost-estimating process used for the Fixed Guideway Transit Alternative, was $2.6 billion in 2006 dollars. As stated previously, the Transit Advisory Task Force Report stated that "the Task Force agrees with this committee that the Alternatives Analysis' construction cost estimates were fairly and consistently prepared, and that they may be used for both planning and cost comparisons." The Project is not comparable to the Tampa Bay toll facility that is referenced in the comment for the reasons stated above.

Again, the Alternatives Analysis fully evaluated the Managed Lane Alternative and documented that it did not perform as well when compared to the Fixed Guideway Transit Alternative under a broad range of metrics. The Managed Lane Alternative will not be restudied in the Final EIS and, as a result, the cost estimates shown in Table 2-2 of the Final EIS for the Managed Lane Alternative have not been revised.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
Creation Date :	12/29/2008
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Submission Date :	12/29/2008

Submission Content/Notes : 29 December, 2008

To:
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650 South King St. 3rd Floor
Honolulu
HI 96813
FAX: (808) 587-6080

Subject: Comment on Draft Environmental Impact Statement (DEIS) "Honolulu High-capacity transit corridor Project", Issue: The purpose and goals for the Honolulu High-capacity Transit Corridor Project Draft Environmental Impact Statement (DEIS) are not consistent with those of the Oahu Regional Transportation Plan 2030 (ORTP 2030).
Facts:
a) The ORTP 2030 states that its purpose is to provide a long-term vision document that outlines transportation goals, objectives, and policies for Oahu. The ORTP 2030 goals and objectives are listed in the discussion section below.
b) The ORTP 2030 document also identifies specific highway and transit projects that are designed to improve safety, reduce congestion, and increase mobility for Oahu's residents and visitors. This regional planning document is required by a number of state and federal mandates and requirements which include the Transportation Equity Act for the 21st Century ("TEA 21"). These requirements are mandated by the Federal Department of Transportation as a means of verifying the eligibility of metropolitan areas for Federal funds earmarked for surface transportation systems.
c) DEIS para. 1.7 states "The purpose of the Honolulu High-capacity Transit corridor is to provide high-capacity rapid transit in the transportation corridor.....as specified in the ORTP 2030."
d) DEIS para. 1.8 – States that there are several needs for transit improvements in the transit corridor: (1) Improve corridor mobility, (2) Improve corridor travel reliability, (3) Improve access to planned development to support city policy to develop a second urban center, and (4) Improve transportation equity.
Discussion:
a) GOALS AND OBJECTIVES FOR THE 2030 OAHU REGIONAL TRANSPORTATION PLAN, October 2004
http://oahumpo.org/ortp/media/GoalsObjectives_041022_final.pdf

Transportation Services System Goal:
Develop and maintain Oahu's islandwide transportation system to ensure efficient, safe,
convenient and economical movement of people and goods.
Objectives:
#1 Increase peak-period person-carrying capacities on Oahu's transportation network.
#2 Provide efficient, convenient and cost-effective transit service to Oahu citizens.
#3 Encourage the availability of adequate public and private services

between Waikiki, the
airport and other tourist destinations.
#4 Promote intermodal efficiency of harbor terminal facilities, airport terminal facilities and
land transportation systems.
#5 Ensure that no person shall, on the grounds of race, color, gender, age, income,
disability, or national origin, be excluded from participation in, be denied the benefits of,
or be subjected to discrimination in transportation services as provided for under current
federal, state, and local legislation.
#6 Ensure user and community safety and security in the physical design and operation of
transportation facilities.
#7 Ensure that Oahu's transportation system is planned, designed, constructed and
operated in an integrated and cost-effective manner.
#8 Enhance the performance and efficiency of Oahu's transportation system through the
use of operation management strategies, such as Intelligent Transportation System
(ITS), Transportation System Management (TSM) and Transportation Demand
Management (TDM).
#9 Enhance the integration and connectivity of the regional transportation system.
#10 Promote planning, design and construction of transportation facilities and systems to
support economic development and vitality.
#11 Provide major rehabilitation/renewal/modernization of facilities in sufficient magnitude to
ensure continued effective operation.

2030 ORTP Planning Study 2 Goals and Objectives
GOALS AND OBJECTIVES FOR THE 2030 OAHU REGIONAL TRANSPORTATION PLAN
Environment and Quality of Life System Goal:
Develop and maintain Oahu's transportation system in a manner that maintains environmental
quality and community cohesiveness.
Objectives:
#12 Develop and maintain Oahu's transportation system to meet or exceed noise, air and
water quality standards set forth by federal, state and local agencies.
#13 Encourage energy conservation in transportation.
#14 Preserve Oahu's cultural integrity and sensitive natural resources, including beaches,
scenic beauty, and sea and mountain vistas.
#15 Develop and maintain alternative transportation facilities, including bikeways,
walkways and other environmentally-friendly elements which can be

safely integrated
with other transport modes.
#16 Develop a travel demand management system for Oahu that optimizes use of
transportation resources by encouraging programs to increase transit ridership,
increase ridesharing on Oahu, reduce single occupancy vehicle travel, and reduce
auto dependency.
#17 Minimize disruption of existing neighborhoods from construction of the transportation
system.
#18 Ensure that transportation facility design and maintenance are compatible with the
existing and planned physical and social character of new and existing developments.
#19 Maintain and upgrade existing facilities and design future transportation facilities in a
manner that is aesthetically pleasing and incorporates landscaping, tree planting, and
public safety.
#20 Develop transportation contingency plans for energy shortages, natural and manmade
disasters and other emergencies that would impact the transportation system.

2030 ORTP Planning Study 3 Goals and Objectives
GOALS AND OBJECTIVES FOR THE 2030 OAHU REGIONAL TRANSPORTATION PLAN
Land Use and Transportation Integration System Goal:
Develop and maintain Oahu's transportation system in a manner that integrates land use and
transportation.
Objectives:
#21 Maintain and develop the transportation system to reinforce Oahu's planned
population distribution and land use development policies expressed in the City's
Development Plans through coordinated efforts of the public and private sectors.
#22 Encourage innovation in planning, design and maintenance of transportation
services and facilities.
#23 Encourage the implementation of land use development policies that support
efficient use of the transportation system via reduced vehicular tripmaking and
vehicle miles traveled.

b) DEIS purpose stated in paragraph 1.7 is not found in the ORTP goals and objectives listed above.
c) DEIS Needs paragraph 1.8 are not found in the ORTP goals and objectives listed above.

d) The single most important non-compliance of the DEIS with the ORTP 2030 is Objective No. 2 where the ORTP Objective No. 2 is to provide a transportation system that is "COST EFFECTIVE". The reason that Rail is NOT cost effective is that: (1) Rail will cost $6.8 Billion but will still not eliminate the major H-1 bottlenecks at the H-1/H-2 merge and at the Middle Street merge. In fact, the Rail will increase the vehicular overload on H-1 from the present 11,000 vph to 17,500 vehicles per hour on the 9,500 vph capacity H-1 Freeway at Kalauao. The rail alternative must be compared with Professor Prevedouros' $900 million 11 mile, Managed Three-Lane HOV Alternative explained in www.eng.hawaii.edu/~panos/UHCS.pdf. The Managed Three-Lane HOV Alternative eliminates the two H-1 bottlenecks at Pearl City and at Middle Street merge and should be considered "cost effective" by any definition

Conclusion: The purpose and goals for the Honolulu High-capacity Transit Corridor Project Draft Environmental Impact Statement (DEIS) do not conform with ORTP 2030 objective No. 2 with regard to rail being cost effective.

Recommendation: Reinstate the 11 mile Managed Lane HOV Alternative into the DEIS for evaluation as a transit system in terms of cost effectiveness and the potential to eliminate the H-1 bottlenecks at H-1/H-2 merge and at the Middle St. merge.

Respectfully,

Ben Ramelb P.E.
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DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT10/09-336453

Mr. Ben Ramelb
1148 Ala Lilikoi Street
Honolulu, Hawaii 96818

Dear Mr. Ramelb:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal dated December 29, 2008 with subject [Comment on Draft Environmental Impact Statement (DEIS) "Honolulu High-capacity transit corridor Project", Issue: The purpose and goals for the Honolulu High-capacity Transit Corridor Project Draft Environmental Impact Statement (DEIS) are not consistent with those of the Oahu Regional Transportation Plan 2030 (ORTP 2030)]:

The Draft EIS does not specify that the fixed guideway project appears in the goals or objectives of the ORTP. However, Section 1.7 of the Final EIS states that the Fixed Guideway Project is specified in the Oahu Regional Transportation Plan (ORTP). Project Number 31 in the ORTP 2030, as amended and approved in May 2007, further states that the City will "plan, design, and construct a fixed guideway system between East Kapolei and Ala Moana."

As stated in Section 7.4 of the Final EIS, the cost-effectiveness is one of the key criteria that FTA uses to evaluate projects proposed for Section 5309 New Starts funding. The cost-effectiveness indices for the Project compared to the baseline is within the "medium" range established by FTA for its New Starts ratings which, along with other considerations, is currently required to qualify for New Starts funding (see Table 7-8 in the Final EIS). As shown in

Table 6-1 of the Final EIS, the Project will cost $4.6 billion in 2009 dollars and $5.5 billion in inflated dollars, including finance charges.

As shown in the Alternatives Analysis Report (DTS 2006b), the Managed Lane Alternative would not eliminate congestion and bottlenecks on the H-1 Freeway. Table 3-12 in the Alternative Analysis Report shows that, under the No Build Alternative, there would be 18,049 vehicles per hour (vph) operating on the H-1 Freeway in 2030. Vehicle volumes rise to 18,327 vph (Two-direction Option) or 18,419 vph (Reversible Option) with the Managed Lane Alternative, while traffic volumes decrease to 17,209 vph with the 20-mile Fixed Guideway Transit Alternative. Accordingly, the Fixed Guideway Transit Alternative will reduce traffic volumes from those projected under the 2030 No Build Alternative.

The analysis of the Managed Lane Alternative from the Alternatives Analysis Report (DTS 2006b) shows the cost to be $2.6 billion in 2006 dollars (higher today) for a 16-mile facility. As stated in the City Council's Transit Advisory Task Force Report, a committee was charged with reviewing cost estimates for the two alternatives involving construction (the Managed Lane Alternative and Fixed Guideway Alternative). The report states that "the Task Force agrees with this committee that the Alternatives Analysis' construction cost estimates were fairly and consistently prepared, and that they may be used for both planning and cost comparisons." Information was obtained by the Task Force from the Hawaii Department of Transportation and others familiar with managed lane facilities. It is the only estimate to date that addresses Honolulu conditions.

The Alternatives Analysis fully evaluated the Managed Lane Alternative and documented that it performed poorly compared to the Fixed Guideway Transit Alternative on a broad range of metrics. Any slight changes to the alternative would not result in substantially different findings.

After the Alternatives Analysis was completed, several scoping comments were received requesting reconsideration of the Managed Lane Alternative that was considered and rejected during the Alternatives Analysis. Because no new information was provided that would have changed the findings of the Alternatives Analysis regarding the Managed Lane Alternative, it was not included in the Draft EIS for further consideration.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
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Submission Date :	12/29/2008

Submission Content/Notes : 29 December, 2008

To:
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Director Department of Transportation Services
City and County of Honolulu
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HI 96813
FAX: (808) 587-6080

Subject: Comment on Draft Environmental Impact Statement (DEIS) "Honolulu High-capacity transit corridor Project", Issue : The purpose and goals for the Honolulu High-capacity Transit Corridor Project Draft Environmental Impact Statement (DEIS) do not conform with those of the Oahu Regional Transportation Plan 2030 (ORTP 2030).
Facts:
a) The ORTP 2030 states that its purpose is to provide a long-term vision document that outlines transportation goals, objectives, and policies for Oahu. The ORTP 2030 goals and objectives are listed in the discussion section below.
b) The ORTP 2030 document also identifies specific highway and transit projects that are designed to improve safety, reduce congestion, and increase mobility for Oahu's residents and visitors. This regional planning document is required by a number of state and federal mandates and requirements which include the Transportation Equity Act for the 21st Century ("TEA 21"). These requirements are mandated by the Federal Department of Transportation as a means of verifying the eligibility of metropolitan areas for Federal funds earmarked for surface transportation systems.
c) DEIS para. 1.7 states "The purpose of the Honolulu High-capacity Transit corridor is to provide high-capacity rapid transit in the transportation corridor.....as specified in the ORTP 2030."
d) DEIS para. 1.8 – States that there are several needs for transit improvements in the transit corridor: (1) Improve corridor mobility, (2) Improve corridor travel reliability, (3) Improve access to planned development to support city policy to develop a second urban center, and (4) Improve transportation equity.
Discussion:
a) GOALS AND OBJECTIVES FOR THE 2030 OAHU REGIONAL TRANSPORTATION PLAN, October 2004
http://oahumpo.org/orlp/media/GoalsObjectives_041022_final.pdf

Transportation Services System Goal:
Develop and maintain Oahu's islandwide transportation system to ensure efficient, safe,
convenient and economical movement of people and goods.
Objectives:
#1 Increase peak-period person-carrying capacities on Oahu's transportation network. NO.
#2 Provide efficient, convenient and cost-effective transit service to Oahu citizens. NO
#3 Encourage the availability of adequate public and private services

between Waikiki, the
airport and other tourist destinations. NO
#4 Promote intermodal efficiency of harbor terminal facilities, airport terminal facilities and
land transportation systems.
#5 Ensure that no person shall, on the grounds of race, color, gender, age, income,
disability, or national origin, be excluded from participation in, be denied the benefits of,
or be subjected to discrimination in transportation services as provided for under current
federal, state, and local legislation.
#6 Ensure user and community safety and security in the physical design and operation of
transportation facilities.
#7 Ensure that Oahu's transportation system is planned, designed, constructed and
operated in an integrated and cost-effective manner. NO
#8 Enhance the performance and efficiency of Oahu's transportation system through the
use of operation management strategies, such as Intelligent Transportation System
(ITS), Transportation System Management (TSM) and Transportation Demand
Management (TDM).
#9 Enhance the integration and connectivity of the regional transportation system. NO
#10 Promote planning, design and construction of transportation facilities and systems to
support economic development and vitality. NO
#11 Provide major rehabilitation/renewal/modernization of facilities in sufficient magnitude to
ensure continued effective operation. NO

2030 ORTP Planning Study 2 Goals and Objectives
GOALS AND OBJECTIVES FOR THE 2030 OAHU REGIONAL TRANSPORTATION PLAN
Environment and Quality of Life System Goal:
Develop and maintain Oahu's transportation system in a manner that maintains environmental
quality and community cohesiveness.
Objectives:
#12 Develop and maintain Oahu's transportation system to meet or exceed noise, air and
water quality standards set forth by federal, state and local agencies. NO
#13 Encourage energy conservation in transportation. NO
#14 Preserve Oahu's cultural integrity and sensitive natural resources, including beaches,
scenic beauty, and sea and mountain vistas. NO
#15 Develop and maintain alternative transportation facilities, including bikeways,

walkways and other environmentally-friendly elements which can be safely integrated
with other transport modes. NO
#16 Develop a travel demand management system for Oahu that optimizes use of
transportation resources by encouraging programs to increase transit ridership,
increase ridesharing on Oahu, reduce single occupancy vehicle travel, and reduce
auto dependency. NO
#17 Minimize disruption of existing neighborhoods from construction of the transportation
system. NO
#18 Ensure that transportation facility design and maintenance are compatible with the
existing and planned physical and social character of new and existing developments. NO
#19 Maintain and upgrade existing facilities and design future transportation facilities in a
manner that is aesthetically pleasing and incorporates landscaping, tree planting, and
public safety. NO
#20 Develop transportation contingency plans for energy shortages, natural and manmade
disasters and other emergencies that would impact the transportation system. NO

2030 ORTP Planning Study 3 Goals and Objectives
GOALS AND OBJECTIVES FOR THE 2030 OAHU REGIONAL TRANSPORTATION PLAN
Land Use and Transportation Integration System Goal:
Develop and maintain Oahu's transportation system in a manner thet integrates land use and
transportation.
Objectives:
#21 Maintain and develop the transportation system to reinforce Oahu's planned
population distribution and land use development policies expressed in the City's
Development Plans through coordinated efforts of the public and private sectors. NO
#22 Encourage innovation in planning, design and maintenance of transportation
services and facilities. NO
#23 Encourage the implementation of land use development policies that support
efficient use of the transportation system via reduced vehicular tripmaking and
vehicle miles traveled. NO

Findings:

The DEIS purpose and needs stated in paragraphs 1.7 and 1.8 do not

conform with many ORTP 2030 Goals and Objectives noted above for one or more reasons:
(1) Rail transit will result in a net DECREASE in peak-period person-carrying capacities on Oahu's transportation network,
(2) The $6.8 Billion rail is not cost effective because rail will still not eliminate the major H-1 bottlenecks at the H-1/H-2 merge and at the Middle Street merge. In fact, the Rail will increase the vehicular overload on H-1 from the present 11,000 vph to 17,500 vehicles per hour on the 9,500 vph capacity H-1 Freeway at Kalauao ,
(3) Rail transit will not service Waikiki,
(4) The rail transportation system is not cost effective because it does not allow express buses to run in a corridor parallel to the rail route to reduce congestion on H-1 during peak hour,
(5) Rail will not provide relief to increased congestion on H-1 at the H-1/H-1 merge and at Middle St. merge by year 2030. Therefore, rail will not enhance the integration and connectivity of the regional transportation system; will not promote planning, design and construction of transportation facilities and systems to support economic development and vitality; and will not provide major rehabilitation/renewal/modernization of facilities in sufficient magnitude to ensure continued effective operation.
(6) Rail will cause more vehicles to be stuck in gridlock on H-1 and will therefore exceed noise, air and water quality standards set forth by federal, state and local agencies and energy conservation in transportation because rail will result in 8,000 vehicles per hour being stuck in gridlock on H-1 during the am peak period.
(7) The elevated rail located downtown be a visual blight downtown and will not preserve Oahu's cultural integrity and sensitive natural resources, including beaches,
scenic beauty, and sea and mountain vistas.
(8) The rail route on Salt Lake Blvd and Dillingham Blvd instead of the H-1 Viaduct and Nimitz Highway will maximize disruption of existing neighborhoods from construction of the transportation system.

Conclusion:
The elevated rail will cause severe traffic congestion on H-1 during peak hour, will force more vehicles to be stuck in gridlock causing worse pollution, less reliability for many commuters at the rail station waiting for commuter room on the fully loaded train and will cause a visual blight downtown.

Recommendation:

The DEIS must add more transit alternatives such as:
1) an elevated HOV three-lane transit way from Waikele to downtown Hotel and Alakea Sts as described in Professor Panos Prevedouros Report "Transportation Alternatives Analysis for Mitigating Traffic Congestion between Leeward Oahu and Honolulu, Mar 2008." The full report is available at www.eng.hawaii.edu/~panos/UHCS.pdf.
2) BRT proposed by former Mayor Harris in early 2002 0or 2003.

3) Build two separate, three-lane Flyovers, Nimitz and Kamehameha (between Waiawa Interchange and Halawa Interchange). Note that the

two Flyovers has the capacity to eliminate the bottlenecks on H-1 as shown below ("Transit Alternatives Traffic Capacity").

Transit Alternatives Traffic Capacity

Numbers from Table 3-12 of city 2006 Nov Alternative Analysis ($10 million report): (Rail DEIS contains insufficient information to determine extent of congestion on H-1 and other highways at Kalauao (Pearl City).

Rail only: capacity = 6000 commuters per peak hour

H-1 only: rated capacity = 9,500 vehicles per hour (equivalent 15,400 commuters per hour (some commuters are on express buses)

H-1 forecast yr 2030 traffic load = 17,500 vehicles per hour per City AA Table 3-12 (or 8,000 vph overload (on H-1) = 9,600 commuters per hour)

Managed Three-lane HOV Reversible Flyover: capacity = 6,000 high occupancy vehicles per hour (equivalent 21,600 commuters per hour). Capacity based on HOV use on Flyover by 200 express buses per peak hour, car pools, van pools, green cars and HOV2 or HOV3. (commuter capacity = 50 pns per express bus plus 5,800 vph at avge 2 pns per vehicle).

Year 2030 commuter load by City AA Report = Rail (6000) + H-1 overload (9,600) + H-1 capacity (15,400) = 31,000 commuters.

2030 Load = 31,000 commuters per hour
Rail + H-1 = 21,400 commuters per hour
Managed Lane HOV + H-1 = 37,000 commuters per hour

Conclusion: Rail does not have sufficient commuter capacity which will cause 9,600 commuters to be stuck in gridlock on H-1 or stuck at rail stations (especially at stations between Waipahu and Kalihi). Managed Lane HOV Flyover Alternative will eliminate congestion and bottlenecks on H-1.

Respectfully,

Ben Ramelb P.E.
1148 Ala Lilikoi St
Honolulu, HI
96818

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MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT10/09-336455

Mr. Ben Ramelb
1148 Ala Lilikoi Street
Honolulu, Hawaii 96818

Dear Mr. Ramelb:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal dated December 29, 2008 with subject [Comment on Draft Environmental Impact Statement (DEIS) "Honolulu High-capacity transit corridor Project", Issue: The purpose and goals for the Honolulu High-capacity Transit Corridor Project Draft Environmental Impact Statement (DEIS) do not conform with those of the Oahu Regional Transportation Plan 2030 (ORTP 2030)]:

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We will address your findings in the order they were submitted:

1) As shown in Table 3-21 of the Final EIS, roadway travel lanes will not be removed as a result of the Project. In addition, the fixed guideway system is planned to operate with two or three car trains with a capacity of between 325 and 500 passengers each. At three-minute headways during the peak period, that provides capacity for approximately 8,650 passengers per peak direction per peak hour. This capacity figure applies in both directions for a total system capacity of approximately 17,300 passengers per peak hour. In addition, a major benefit of the fixed guideway is that once built, it is flexible enough to accommodate significant growth. For example, the full capacity of the fixed guideway with four-car trains and 90-second headways is over 25,000 passengers per hour per direction, or over 50,000 total. Accordingly, the fixed guideway system will provide sufficient capacity based on travel demand forecasting results. As a result, the fixed guideway system will add substantial capacity to Oahu's transportation network.

2) As stated in Section 7.4 of the Final EIS, cost-effectiveness is one of the key criteria that FTA uses to evaluate projects proposed for Section 5309 New Starts funding. The cost-effectiveness indices for the Project compared to the baseline is within the "medium" range established by FTA for its New Starts ratings, which, along with other considerations, is currently required to qualify for New Starts funding (see Table 7-8 in Final EIS). As shown in Table 6-1 of the Final EIS, the Project will cost $4.6 billion in 2009 dollars and $5.5 billion in inflated dollars, including finance charges.

The Managed Lane Alternative was fully evaluated in the Alternatives Analysis. As shown in the Alternatives Analysis Report (DTS 2006b), the Managed Lane Alternative would not eliminate congestion and bottlenecks on the H-1 Freeway. Table 3-12 in the Alternative Analysis Report shows that, under the No Build Alternative, there would be 18,049 vehicles per hour (vph) operating on the H-1 Freeway in 2030. Vehicle volumes rise to 18,327 vph (Two-direction Option) or 18,419 vph (Reversible Option) with the Managed Lane Alternative, while traffic volumes decrease to 17,209 vph with the 20-mile Fixed Guideway Transit Alternative. Accordingly, the Fixed Guideway Transit Alternative will reduce traffic volumes from those projected under the 2030 No Build Alternative.

3) While it is correct that the Project will not extend rail service into Waikiki, the Project will provide improved transit service for many trips to Waikiki as, for example, shown in Figure 3-7 in the Final EIS. The Project has logical termini at East Kapolei and Ala Moana Center and independent utility from any extensions that may be constructed in the future. The future extensions to West Kapolei, Salt Lake Boulevard, Waikiki, and UH Manoa are discussed in the cumulative impacts sections of Chapters 3 and 4 of the Final EIS. However, the future extensions are not part of this Project; thus, they are not required to be evaluated under Chapter 343 of the Hawaii Revised Statutes and NEPA. Under NEPA, environmental analysis is only required when there is a proposed action by a Federal agency. Here, because the future extensions are not proposed for implementation at this time, they are not part of the Project studied in the Final EIS. It would be premature to undertake an environmental analysis of the extensions (beyond the cumulative impacts analysis) because they are not part of the proposed action to be taken by the City and FTA. If the future extensions are proposed for implementation in

the future, environmental analysis of the extensions and appropriate alternatives will be undertaken at that time.

4) As noted above, the cost-effectiveness indices for the Project compared to the FTA New Starts Baseline Alternative fall within the "medium" range established by FTA for its New Starts ratings. In addition, the fixed guideway system will serve as an express route for most of the system.

5) As stated above in response to Number 2 (above), the Fixed Guideway Alternative will reduce congestion on H-1 whereas the Managed Lane Alternative would not. As noted in Table 3-14 of the Final EIS, the Project will result in decreased daily vehicle miles traveled, daily vehicle hours traveled, and daily vehicle hours of delay in 2030 as compared to the No Build Alternative. Therefore, rail will provide some relief to the level of congestion that would occur in its absence. Further, by providing an option for travelers to avoid congestion, rail will enhance the integration and connectivity of the regional transportation system while also providing transportation facilities and systems to support economic development and vitality.

The Project is focused on the construction and implementation of rail transit service, which is evaluated in the Draft and Final EISs. As discussed in Section 4.19.2 of the Final EIS, transit-oriented development (TOD) is expected to occur in Project station areas as an indirect effect of the Project. The increased mobility and accessibility that the Project may provide may also increase the desirability and value of land near stations, thereby attracting new real estate investment nearby (in the form of TOD). Planning and zoning around station areas will be established by the City's Department of Planning and Permitting under the City's new TOD ordinance. Ridership on the system would be even higher if TOD occurs.

6) As stated previously, the Fixed Guideway Alternative will improve congestion on the H-1 Freeway and will reduce vehicle hours of delay by 18 percent. Noise effects from the Project are detailed in Section 4.10 of the Final EIS. The Project will cause no severe noise impacts. Three receptors will experience moderate impacts, which will occur on the fifth through ninth floors. The Project includes several features to reduce noise from the system. The Project will include an integrated noise-blocking parapet wall at the edge of the guideway structure that extends three feet above the top of the rail and a system specification for vehicles with wheel skirts. Wheel skirts on trains will also increase the benefit of the parapet wall at locations above the elevation of the track. With mitigation, the Project will not generate any noise impacts. Although you might hear the train, the noise it makes will be at a level that is close to what is currently experienced.

As stated in Section 4.9 of the Final EIS, the Project will reduce regional pollutant emissions between 3.9 to 4.6 percent. The Project will also reduce emissions of greenhouse gases. From the Final EIS Section 4.14, Water, "The Project will secure all federal water permits including Section 401 of the CWA, and Section 404." In addition the Project will follow the State of Hawaii's general policy, to maintain or improved existing water quality in all State waters. Coordination with Federal, State, and local

agencies with water-resource expertise and responsibilities has been ongoing to provide input and guidance on the resources, design and construction of the Project. Coordination will continue as appropriate with regulatory agencies throughout final design and construction. In addition, water resources are discussed in Section 4.19.3 Cumulative Effects, Water: As stated in Section 4.11 of the Final EIS, the Project will reduce daily transportation energy demand by 3 percent. These reductions are due largely to the reduction in vehicle miles traveled.

7) The visual and cultural effects of the alternatives are described in Sections 4.8 and 4.16, respectively, of the Final EIS.

The island's unique visual character and scenic beauty were considered in the visual and aesthetic analysis presented in the Draft and Final EISs. As discussed in Section 4.8 of the Final EIS, the Project will be set in an urban context where visual change is expected and differences in scales of structures are typical.

As part of the design process, the City has developed design principles, which are identified in the Honolulu High-Capacity Transit Corridor Project Compendium of Design Criteria (RTD 2009m) that will be implemented in final design to minimize visual effects of the Project. For example, guideway materials and surface textures will be selected in accordance with generally accepted architectural principles to achieve effective integration between the guideway and its surrounding environment. Landscape and streetscape improvements will mitigate potential visual impacts, primarily for street-level views.

Other measures to address visual impacts of the Project are being developed through the station design and planning process. The initial station area plans and design guidelines were first developed with coordination between DTS and the Department of Planning and Permitting (DPP). The next level of transit station design focuses on integrating individual neighborhood characteristics of the communities served by the stations.

The following mitigation framework will be included in the Project to minimize negative visual effects and enhance the visual and aesthetic opportunities that it creates:

- *Develop and apply design guidelines that will establish a consistent design framework for the Project with consideration of local context.*
- *Coordinate the project design with City TOD planning and DPP.*
- *Consult with the communities surrounding each station for input on station design elements.*
- *Consider specific sites for landscaping and trees during the final design phase when plans for new plantings will be prepared by a landscape architect. Landscape and streetscape improvements will serve to mitigate potential visual impacts.*

Section 4.8.3 of the Final EIS, Design Principles and Mitigation includes information related to the mitigation framework described above. Specifically architecture and landscape design criteria include guidelines regarding site design, materials and finishes, and lighting, which apply to stations, station areas, and the guideway.

8) The construction-related effects of the alternatives are described in Sections 3.6 and 4.18 of the Final EIS. While each of the alternatives discussed in the Draft EIS includes trade-offs between benefits and impacts, the Airport Alternative from East Kapolei to Ala Moana has been identified as the Preferred Alternative as described above. Compared to the other alternatives discussed in the Draft EIS, the Airport Alternative will carry the most passengers, provide the greatest transit-user benefits, and result in the fewest vehicle hours of delay. It will provide access to employment centers at Pearl Harbor Naval Base and Honolulu International Airport and will serve the Salt Lake neighborhood with connecting bus service. Of the three Build Alternatives addressed in the Draft EIS, the Airport Alternative will have slightly lower impacts to the natural and built environment. During the public comment period on the Draft EIS, the public overwhelmingly supported the Airport Alternative. Of the comments that specifically supported one of the alternatives, more than 75 percent were in support of the Airport Alternative. As a result, the Project will not affect Salt Lake Boulevard.

The congestion, pollution, and visual components of your conclusion have been addressed previously in this response letter. In addition, the Project will completely separate fixed guideway vehicles from roadway traffic operations, and it will provide substantially higher transit service reliability compared to the No Build Alternative. This reliability will not deteriorate over time, even with projected population and employment growth in the study corridor. The reliability of fixed guideway vehicles will be better than the reliability of transit vehicles operating on increasingly congested highways.

Regarding the recommendations in your letter:

1) There could be many other versions of the Managed Lane Alternative with minor adaptations to suit one or another special concern. In the end, the approaches all have similar challenges as a primary solution to Honolulu's transportation problems. They do not reduce congestion, increase the reliability of the transportation system, serve future land use plans, or improve the fairness of and access to the transportation system. They also do not offer an alternative to perpetuating a reliance on limited existing travel modes. For example, localized bypasses would not meet system goals for corridor-wide benefits to mobility, reliability, access, and equity. In sum, they do not address the Purpose and Need of the Project.

2) As stated in Chapter 2 of the Final EIS, prior to selecting an elevated fixed guideway system, a variety of high-capacity transit options were evaluated during the Primary Corridor Transportation Project (1998-2002) and Alternatives Analysis. Options evaluated and rejected include an exclusively at-grade fixed-guideway system using bus rapid transit vehicles. In addition to comments received during the Alternatives Analysis and EIS scoping sessions, these studies provided a critical foundation for the conclusion

that an elevated system would result in the best overall performance and better support of the Purpose and Need for the Project. In addition, the proposed Bus Rapid Transit Alternative, as stated in your letter, is a variation of the Transportation System Management Alternative that was evaluated in the Alternatives Analysis. While this alternative has merit for cost-effectiveness, its overall system benefit would be very low.

3) Localized bypasses would not meet system goals for corridor-wide benefits to mobility, reliability, access, and equity. The Hawaii Department of Transportation, which is responsible for the freeway system, has evaluated needs for the freeway system and identified the highway projects that would be most efficient at reducing congestion on Oahu. The projects, including a Nimitz Flyover, are listed in Table 2-3 of the Draft EIS and included in the analysis for all project alternatives. Effects of the Nimitz Flyover on traffic conditions in 2030 are discussed in Section 3.4.2 of the Final EIS. Travel on the Nimitz Flyover was included for the following travel pairs under the No Build Alternative: Kapolei to Downtown, Ewa to Downtown, and Mililani to Downtown. As shown in Figure 3-7 of the Final EIS, the Nimitz Flyover does improve transit travel times with the No Build Alternative between certain travel pairs (e.g., between Mililani and Downtown) compared to 2007 conditions. However, as also shown in this figure, travel times improve substantially more with the addition of the Project. As a point of clarification, a Final EIS was never prepared for the Nimitz Flyover.

Regarding Transit Alternatives Traffic Capacity:

The comments included items relating to guideway capacity. Since the Draft EIS was published, the travel demand model has been refined by adding an updated air passenger model (which forecasts travel in the corridor related to passengers arriving or departing at Honolulu International Airport), defining more realistic drive access modes (driving alone or car pooling) to project stations and recognizing a more robust off-peak non-home-based direct demand element (trips that do not originate at home) based on travel surveys in Honolulu. These revisions were made based on consultation with FTA. As stated in Chapter 3 of the Final EIS, the travel demand forecasting model predicts a maximum peak direction volume of 14,700 passengers during the a.m. two-hour peak period. As a result of updated ridership forecasts, the operating plan for the fixed guideway system has been revised and the system will have a minimum capacity of approximately 17,300 passengers per direction during the two-hour peak period. The fixed guideway system is planned to operate with two or three car trains with a capacity of between 325 and 500 passengers each. At three-minute headways during the peak period, that provides capacity for approximately 8,650 passengers per peak direction per peak hour. This capacity figure applies in both directions for a total system capacity of approximately 17,300 passengers per peak hour. The numbers presented in your comment understate the capacity of the fixed guideway by a substantial margin.

In addition, a major benefit of the fixed guideway is that once built, it is flexible enough to accommodate significant growth. For example, the full capacity of the fixed guideway with four-car trains and 90-second headways is over 25,000 passengers per hour per direction or over 50,000 in total. Accordingly, the fixed guideway system will provide sufficient capacity based on travel demand forecasting results.

In response to your conclusions, the Managed Lane Alternative would not eliminate congestion and bottlenecks on the H-1 Freeway. Accordingly, the Fixed Guideway Transit Alternative will have the most significant reduction on traffic volumes when compared to the other alternatives studied. With regard to conditions for commuters at guideway stations, as stated above, the fixed guideway system will have sufficient capacity based on travel demand forecasting results.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
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Submission Date :	12/29/2008

Submission Content/Notes : 29 December, 2008

To:
Mr. Wayne Yoshioka
Director Department of Transportation Services
City and County of Honolulu
650 South King St. 3rd Floor
Honolulu
HI 96813
FAX: (808) 587-6080

Subject: Comment on Draft Environmental Impact Statement (DEIS) "Honolulu High-capacity transit corridor Project",

Issue : The DEIS lacks goal to eliminate or substantially reduce traffic congestion

Discussion:
DEIS Section 1.8 cites needs for Transit improvements but does not include the single and most important reason for building mass transit: To provide TRAFFIC RELIEF during peak hour. The city cit Alternative Analysis and DEIS show that rail transit, despite costing over $6.0 billion, will not provide traffic relief. In fact, after rail is built and operating, The AA shows that the traffic overload on H-1 (capacity ~ 9,500 vehicles per hour) at Kalauao will rise from the present 11,000 vph to 17,400 vphl

Therefore rail should NOT be considered as a candidate for Oahu mass transit because it does not accomplish the "MISSION" of mass transit. ALL other reasons for building rail transit are secondary and do NOT justify spending at least $6.0 Billion of taxpayers dollars.

I have read the City's Alternative Analysis and UH Professor Panos Prevedouros Study "Transportation Alternative Analysis for Mitigating Traffic Congestion between Leeward Oahu and Honolulu." The HOT Lanes outlined in the Professor's study will provide a separate express highway to bypass the known traffic bottlenecks at Pearl City and at Middle Street and will reduce H-1 congestion by 35 percent. HOT will cost of less than $900 Million (Tampa built a similar 10 mile three-lane HOT for $320 million in 2005.

Another option is to build two Flyover bypasses around the two major H-1 bottlenecks described as follows:
Nimitz Flyover, Reversible HOV:
The Nimitz HOV Flyover is a 3-mile reversible, elevated, three-lane structure over the Nimitz Highway median from the Airport Viaduct at Keehi Lagoon to Hotel Street and Alakea St/Halekauwila St. The Flyover would be built similar to the Tampa Elevated three-lane Reversible HOV as described in-
http://www.tollroadsnews.com/node/172 .
One of the three lanes would exit the Flyover at Waikamilo Rd. to provide access to job centers in Kalihi, resulting in the Flyover having only two lanes entering downtown. The downtown terminal connections from the Nimitz HOV Flyover include an elevated busway from Iwilei to

Hotel Street and a single lane underpass to both Alakea St/Halekauwila Streets. These connections are described in a Managed Lane Study "Transportation Alternatives Analysis for Mitigating Traffic congestion between Leeward Oahu and Honolulu". The full report is available at www.eng.hawaii.edu/~panos/UHCS.pdf.
The initial 2005 cost for the 10 mile Tampa Reversible was $320 million or $32 Million per highway mile, however, a geotechnical design error increased the cost to $420 million or $42 million per mile. Using a geographic and escalation factor of 100 percent, the 3-mile Nimitz HOV Flyover at $60 to $80 million per mile would cost $180 million to $240 million.
The "Nimitz Flyover" has an approved Final Environmental Impact Statement which allows for early construction.

Kamehameha Flyover, Reversible HOV:
The Kamehameha HOV Flyover is a 4-mile reversible, elevated, three-lane structure over the median of Kamehameha Highway from the H-1/H-2 merge at the Waiawa Interchange to the Airport Viaduct just diamond head of the Aloha Stadium. The Flyover should be built similar to the Tampa Elevated three-lane Reversible HOV as described in-http://www.tollroadsnews.com/node/172 .
The Kamehameha Flyover should be connected to H-1, H-2, Kamehameha Highway and Farrington Highway at the west end and to the Airport Viaduct at the east end. These connections are described in a Managed Lane Study "Transportation Alternatives Analysis for Mitigating Traffic congestion between Leeward Oahu and Honolulu". The full report is available at www.eng.hawaii.edu/~panos/UHCS.pdf.
The initial 2005 cost for the 10 mile Tampa Reversible was $320 million or $32 Million per highway mile, however, a geotechnical design error increased the cost to $420 million or $42 million per mile. Using a geographic and escalation factor of 100 percent, the 4-mile Kamehameha HOV Flyover at $60 to $80 million per mile would cost between $240 million to $320 million.
The Draft Environmental Impact Statement (DEIS) - Honolulu High-Capacity Transit Corridor Project Nov 2008 , shows the rail route over Kamehameha Highway between Pearl City and Aloha Stadium which could conflict with the proposed three-lane "Kamehameha Flyover" route outlined above. If the rail is built, it is suggested that both the Kamehameha Highway "Flyover" and the Rail be built within the elevated Kamehameha Highway corridor. In this case, only a two-lane "Kamehameha Flyover" is needed (instead of three-lanes) to ba built alongside and parallel to the Rail transit. The rail with a capacity of 6,000 commuters per hour and the two-lane "Kamehameha Flyover", with a capacity of 4,000 vehicles per hour, should be adequate to substantially reduce the bottleneck at the H-1/H-2 merge and the traffic congestion on H-1 between Pearl City and Aloha Stadium.

Conclusion:
The Kamehameha and Nimitz Flyovers are cost effective alternatives for mass transit.

Recommendation:
Include the Kamehameha Flyover and Nimitz Flyover Alternatives for

mass transit consideration in the DEIS.

Respectfully,

Ben Ramelb P.E.
1148 Ala Lilikoi St.
Honolulu HI 96818

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WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT10/09-336473

Mr. Ben Ramelb
1148 Ala Lilikoi Street
Honolulu, Hawaii 96818

Dear Mr. Ramelb:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address your comments received from agencies and the public on the Draft EIS. The following paragraphs address comments regarding the above-referenced submittal dated December 29, 2008, with subject [Comment on Draft Environmental Impact Statement (DEIS) "Honolulu High-capacity transit corridor Project"]:

Project goals and objectives are discussed in Section 1.8 of the Final EIS. Section 1.8.1 in the Final EIS states that transit improvements are needed to "improve corridor mobility." This section explains that, "Currently, motorists traveling from West Oahu to Downtown experience highly congested traffic during the a.m. peak period. By 2030, after including all the planned roadway improvements in the ORTP, the level of congestion and travel time are projected to increase further.... Expansion of the roadway system between Kapolei and UH Manoa is constrained by physical barriers and by dense urban neighborhoods that abut many existing roadways. Given current and increasing levels of congestion, an alternative method of travel is needed within the study corridor independent of current and projected highway congestion."

As shown in Table 6-1 of the Final EIS, the Project will cost $4.6 billion in 2009 dollars and $5.5 billion in inflated dollars, including finance charges.

Traffic volumes in 2030 under any alternative will be higher than those observed under current conditions. Table 3-12 in the Alternative Analysis shows that there will be 18,049 vehicles per hour (vph) operating on the H-1 Freeway in 2030 under No Build conditions.

Vehicle volumes rise to 18,327 vph (Two-direction Option) or 18,419 vph (Reversible Option) with the Managed Lane Alternative. However, traffic volumes decrease to 17,209 vph with the 20-mile Fixed Guideway Transit Alternative. Accordingly, the Fixed Guideway Transit Alternative will have the most significant reduction on traffic volumes when compared to any other alternative studied.

Chapter 3 of the Final EIS shows that the Fixed Guideway Transit Alternative will reduce by 18 percent the vehicle hours of delay that would occur if the guideway were not built. It does reduce congestion in 2030 compared to what would happen if only the highway projects identified in the OahuMPO Regional Transportation Plan and presented in Table 2-4 of the Final EIS were constructed.

The analysis of the Managed Lane Alternative in Honolulu from the Alternatives Analysis Report (DTS 2006b) shows the cost to be $2.6 billion in 2006 dollars (higher today) for a 16-mile facility. As stated in the City Council's Transit Advisory Task Force Report, a committee was charged with reviewing cost estimates for the two alternatives involving construction (the Managed Lane Alternative and Fixed Guideway Alternative). The report states that "the Task Force agrees with this committee that the Alternatives Analysis' construction cost estimates were fairly and consistently prepared, and that they may be used for both planning and cost comparisons." Information was obtained by the Task Force from the Hawaii Department of Transportation and others familiar with managed lane facilities. It is the only estimate to date that addresses Honolulu conditions. A Managed Lane Alternative would not eliminate congestion and bottlenecks on the H-1 Freeway. See the discussion above regarding information in Table 3-12 of the Alternatives Analysis.

There is no substantiation of the estimate from the Tampa Bay toll facility being applicable in Honolulu. The designer of the Tampa Bay facility herself admitted that to apply such an estimate without detailed consideration of the many differences between the two locations is not reasonable. For clarification, the Tampa Bay elevated toll lanes extend only 5.8 miles within the 10-mile expressway. The costs quoted are from 2002, long before the costs of materials and construction rose dramatically after 2004. Furthermore, the corridor within which the Tampa Bay lanes are built required no right-of-way, had no significant utility conflicts, no major structures or crossings, and was built in much more favorable geotechnical conditions than exist on Oahu. In addition, the Transit Task Force Report dated December 14, 2006, states that "the committee concluded that the projects are sufficiently different (actual costs versus projected costs with contingencies; available, accessible ROW vs. construction in actively used highways; no utilities relocation vs. extensive relocations) as to make the comparison unreasonable." The $900 million for the facility in Honolulu was calculated without the benefit of a full understanding of the circumstances, according to Linda Figg, the person who made the estimate. The more accurate estimate included in the Alternatives Analysis for a 16-

mile facility was $2.6 billion and has been vetted by HDOT and other experts familiar with Honolulu.

Localized bypasses would not meet system goals for corridor-wide benefits to mobility, reliability, access, and equity. The Hawaii Department of Transportation, which is responsible for the freeway system, has evaluated needs for the freeway system and identified the highway projects that would be most efficient at reducing congestion on Oahu. The projects, including a Nimitz Flyover, are listed in Table 2-3 of the Draft EIS and included in the analysis for all project alternatives. Effects of the Nimitz Flyover on traffic conditions in 2030 are discussed in Section 3.4.2 of the Final EIS. Travel on the Nimitz Flyover was included for the following travel pairs under the No Build Alternative: Kapolei to Downtown, Ewa to Downtown, and Mililani to Downtown. As shown in Figure 3-7 of the Final EIS, the Nimitz Flyover does improve transit travel times with the No Build Alternative between certain travel pairs (e.g., between Mililani and Downtown) compared to 2007 conditions. However, as also shown in this figure, travel times improve substantially more with the addition of the Project. As a point of clarification, a Final EIS was never prepared for the Nimitz Flyover.

Chapter 3 of the Final EIS shows that the relief provided by the fixed guideway is substantially better than from building the highway improvements in the OahuMPO Regional Transportation Plan only. Any increase in traffic on the H-1 Freeway would be worse in the absence of the fixed guideway. The fixed guideway reduces delay compared to a road-only option. The assumptions on which the analysis is based include projects such as the Nimitz Flyover, the widenings proposed for the H-1 Freeway, and others.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
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Submission Date :	12/29/2008

Submission Content/Notes : 29 December, 2008

To:
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City and County of Honolulu
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FAX: (808) 587-6080

Subject: Comment on Draft Environmental Impact Statement (DEIS) "Honolulu High-capacity transit corridor Project", Issue : DEIS does not include Managed Lane alternative as stated in the Notice of Intent (NOI)

Fact:
DEIS Table 3-20 provides existing traffic volumes but does not provide forecasted volumes with resultant Level of Service (LOS) for each specific highway.

NEPA violation: The DEIS lacks the Managed Lane Alternative (MLA) as stated in the Notice of Intent (NOI) dated 7 Dec 2007 (reference (a), which states:

"The Federal Transit Administration (FTA) and the City and County of Honolulu, Department of Transportation Services (DTS) intend to prepare an EIS (and Alternative Analysis (AA)) on a proposal by the City and County of Honolulu to implement transit improvements that potentially include high-capacity transit service in a 25-mile travel corridor between Kapolei and the University of Hawaii at Manoa and Waikiki. Alternatives proposed to be considered in the AA and draft EIS include No Build, Transportation System Management, Managed Lanes, and Fixed Guideway Transit. Other transit alternatives may be identified during the scoping process."

Rationale: The process used by the City & County of Honolulu (City) for assessing the Managed Lane Alternative (MLA) in the City's Alternatives Analysis (AA) was flawed.
a) A similar length Managed Lane, reversible three-lane transit way was built for $320 million in Tampa in year 2005, while the City AA estimated the similar MLA to cost $2.6 Billion.

b) Professor Panos Prevedouros published a study for Managed Lanes (reversible) in March 2008, " Transportation Alternatives Analysis for Mitigating Traffic Congestion between Leeward Oahu and Honolululu" which shows the 11 mile three-lane cost estimate to be $900 million which is in line with the $320 million Tampa three-lane reversible transitway. The professor believes the Plan's costs are accurate based on cost estimate spreadsheet analysis received from a local heavy construction estimation expert is $818,634,000 in 2008 dollars. Again, this estimate is more in line with the Tampa Transit way estimate and refutes the AA estimate of $2.6 Billion. The AA estimate disqualified the Managed Lane Alternative to be inferior to the Rail Alternative which

cost $3.7 Billion.

c) 2008 Mayoral Candidate Ann Kobayashi, using the Professor's 4 year Managed Lane study and the former Mayor Harris Administration BRT Study, proposed a similar Managed Lane 15-mile fixed guideway which is estimated at $1.2 Billion. The estimate is similar to the 11 mile Managed Lane and which should have been used in the AA rather than $2.6 Billion.

d) Parsons Brinkerhoff (PB) and the City proposed that automobiles with two or more occupants should be allowed toll free on the MLA. This made the current contraflow zipper lane untenable and thus provided the rationale for removing it. The net result was that the additional two lane advantage that the MLA offered to the Corridor was reduced to one lane. They failed to publish their assessment of the option of having all autos pay a toll, which would have resulted in the zipper lane and the two-lane advantage being retained. And they failed to analyze MLA options with higher occupancy thresholds, such as three through five occupants.

e) PB and the City added unnecessary costs to the project by proposing a 16-mile facility while not testing the viability of shorter 10 to 12-mile versions.

f) PB and the City inflated MLA operating costs to make the project appear uncompetitive with the Fixed Guideway Alternative. Just two examples are a) the projection of a totally unnecessary 5,400 parking stalls for the MLA, and b) saddling the MLA with inflated bus operating costs.

g) PB and the City engineered the ingress and egress ramps in a way that could only result in heavy traffic congestion at these points. In fact, the MLA has exit/off ramps along its route for access to job centers other than downtown Honolulu.

h) PB and the City grossly inflated the capital costs of the MLA with the result that, if correct, it would be twice the cost per lane mile of any highway ever built in the U.S.
In his letter to the City and copied to FTA, Dr. Panos Prevedouros, Professor of Traffic Engineering at the University of Hawaii, Chair of the Transportation Research Board's Highway Micro-simulations Committee and a member of the Task Force, commented, "the most egregious violation of FTA's rules on alternative specification and analysis was the deliberate underengineering of the Managed Lanes Alternative to a degree that brings ridicule to prevailing planning and engineering principles."

i) The 11 mile, elevated MLA, with three lanes as proposed by Professor Prevedouros, has the future commuter capacity to eliminate the two H-1 bottlenecks at Pearl City and at Middle Street merge. The Rail, according to the AA, table 3-12, will result in 17,500 vehicles per hour on H-1 (H-1 full capacity = 9,500 vph) because the Rail cannot accommodate the full commuter demand in year 2030.

Conclusion: The City's AA wrongly estimated the cost of the Managed Lane alternative and the MLA capacity to eliminate the H-1 bottlenecks on H-1.

Recommendation: It is requested that the Managed Lane Alternative as proposed by Ann Kobayashi's EzWay proposal or the Professor Prevedouros Managad Lane Study be reinstated into the Honolulu's Transit Corridor Draft Environmental Impact Statement

Respectfully,

Ben Ramelb P.E.
1148 Ala Lilikoi St
Honolulu, HI
96818

Reference (a):
[Federal Register: December 7, 2005 (Volume 70, Number 234)]
[Notices]
[Page 72871-72873] From the Federal Register Online via GPO Access
[wais.access.gpo.gov] [DOCID:fr07de05-137]

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT10/09-366489

Mr. Ben Ramelb
1148 Ala Lilikoi Street
Honolulu, Hawaii 96818

Dear Mr. Ramelb:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal dated December 29, 2008 with subject [Comment on Draft Environmental Impact Statement (DEIS) "Honolulu High-capacity transit corridor Project", Issue: DEIS does not include Managed Lane alternative as stated in the Notice of Intent (NOI)]:

The Notice of Intent for the EIS was dated March 15, 2007, and reads: "Alternatives proposed to be considered in the Draft EIS include a No Build and two Fixed Guideway Transit Alternatives."

Table 3-20 in the Draft EIS provides forecasted (2030) traffic volumes for the No Build and Salt Lake Alternatives. This table was updated in the Final EIS to include traffic volumes on individual roadway facilities, maximum volume thresholds, number of lanes, and level-of-service on each roadway and at each screenline for the No Build and Airport Alternative (Tables 3-9 and 3-10). Numbers have been updated for the Final EIS based on the Airport Alternative and refinements to the travel demand forecasting model to account for non-home based direct-demand trips during off-peak periods (trips that do not originate or end at home). In addition, the air passenger model (which forecasts travel in the corridor related to passengers arriving or departing at Honolulu International Airport) was updated to reflect current conditions. These

revisions were made based on FTA direction. The updated results continue to show that traffic, when compared to No Build conditions, will decrease with the addition of the Project.

a) There is no substantiation of the estimate from the Tampa Bay toll facility being applicable in Honolulu. The designer of the Tampa Bay facility herself admitted that to apply such an estimate without detailed consideration of the many differences between the two locations is not reasonable. For clarification, the Tampa Bay elevated toll lanes extend only 5.8 miles within the 10-mile expressway. The costs quoted are from 2002, long before the costs of materials and construction rose dramatically after 2004. Furthermore, the corridor within which the Tampa Bay lanes are built required no right-of-way, had no significant utility conflicts, no major structures or crossings, and was built in much more favorable geotechnical conditions than exist on Oahu. In addition, the Transit Task Force Report dated December 14, 2006, states that "the committee concluded that the projects are sufficiently different (actual costs versus projected costs with contingencies; available, accessible ROW vs. construction in actively used highways; no utilities relocation vs. extensive relocations) as to make the comparison unreasonable."

b) The Managed Lane Alternative was fully evaluated in the Alternatives Analysis. The analysis of the Managed Lane Alternative in Honolulu from the Alternatives Analysis Report (DTS 2006b) shows the cost to be $2.6 billion in 2006 dollars (higher today) for a 16-mile facility. As stated in the City Council's Transit Advisory Task Force Report, a committee was charged with reviewing cost estimates for the two alternatives involving construction (the Managed Lane Alternative and Fixed Guideway Alternative). The report states that "the Task Force agrees with this committee that the Alternatives Analysis' construction cost estimates were fairly and consistently prepared, and that they may be used for both planning and cost comparisons." Information was obtained by the Task Force from the Hawaii Department of Transportation and others familiar with managed lane facilities. It is the only estimate to date that addresses Honolulu conditions.

c) Ann Kobayashi's proposed EzWay is similar to the Managed Lane Alternative that was thoroughly evaluated in the Alternatives Analysis, which also accommodated both single occupant and transit vehicles. No known cost estimate for the proposal has been prepared or checked by a qualified registered Professional Engineer. As a point of reference, Hawaii's Highway Modernization Plan dated January 22, 2009, estimates the cost of the Nimitz Viaduct at $600 million for an approximately 2.5-mile elevated highway.

d) As discussed in the Chapter 5, Alternative 3b of the Detailed Definition of Alternatives Report (2006), the reversible lane Managed Lane Alternative provides three managed/HOV lanes in the peak direction, which is sufficient to satisfy the demand for restricted lanes. Eliminating the zipper lane frees up two off-peak direction lanes – one HOV and one general purpose lane. By 2030, the directional transportation demand will be more balanced than it is today. Eliminating the zipper lane while evaluating the Reversible Option for the Managed Lane Alternative provided the greatest benefit to modeled freeway users by increasing capacity in both directions. The system was optimized to balance demand without regard to toll policy. As stated in the Alternatives Analysis, for the Reversible Option, three-person high-occupancy vehicles (HOVs) would

be allowed to use the facility for free while single-occupant and two-person HOVs would have to pay a toll.

e) A shorter system would have resulted in proportionately less benefit. The full system evaluated already would provide substantially less benefit than the Fixed Guideway Alternative. Shortening of the Managed Lane Alternative, whether to 14 miles, 12 miles, or 2 miles, would not have increased the benefits to the traveling public compared to the alternative evaluated.

f) The operating and maintenance costs for all alternatives addressed in the Alternatives Analysis Report, including the Managed Lane Alternative, were estimated in a consistent manner, as described on pages 5-3 and 5-4 of the Alternatives Analysis Report. The supply of park-and-ride stalls assumed for the Managed Lane Alternative was sized to meet forecast demand. The number of parking spaces was reflected in the capital costs of the Managed Lane Alternative, not in the operating and maintenance costs. One purpose of the Project is to improve benefits to transit users. With the Managed Lane Alternative, those benefits could only be provided through improvements to the bus system.

g) The Managed Lane Alternative evaluated in the Alternatives Analysis was designed by experts in such facilities. Access ramps were placed at locations that required direct access to the managed lanes because demand was high. Because of engineering requirements, access ramps require substantial rights-of-way and, as a result, are very costly. More ramps could be added, but it would make the project more expensive and reduce the point-to-point functionality of the system.

h) Please see the answers above to points a. and b.

i) The Managed Lane Alternative would not eliminate congestion and bottlenecks on the H-1 Freeway. Table 3-12 in the Alternative Analysis Report shows that there would be 18,049 vehicles per hour (vph) operating on the H-1 Freeway in 2030 under the No Build Alternative. Vehicle volumes rise to 18,327 vph (Two-direction Option) or 18,419 vph (Reversible Option) with the Managed Lane Alternative, while traffic volumes decrease to 17,209 vph with the 20-mile Fixed Guideway Transit Alternative. Accordingly, the Fixed Guideway Transit Alternative will reduce traffic volumes from those projected under the 2030 No Build Alternative.

As stated in Chapter 3 of the Final EIS, the travel demand forecasting model predicts a maximum peak direction volume of 14,700 passengers during the a.m. two-hour peak period. As a result of updated ridership forecasts, the operating plan for the fixed guideway system has been revised and the system will have a minimum capacity of approximately 17,300 passengers per direction during the two-hour peak period. The fixed guideway system is planned to operate with two or three car trains with a capacity of between 325 and 500 passengers each. At three-minute headways during the peak period, that provides capacity for approximately 8,650 passengers per peak direction per peak hour. This capacity figure applies in both directions for a total system capacity of approximately 17,300 passengers per peak hour.

In addition, a major benefit of the fixed guideway is that once built, it is flexible enough to accommodate significant growth. For example, the full capacity of the fixed guideway with four-car trains and 90-second headways is over 25,000 passengers per hour per direction, or over 50,000 in total. Accordingly, the fixed guideway system will provide sufficient capacity based on travel demand forecasting results.

There could be many other versions of this type of system with minor adaptations to suit one or another special concern. In the end, the above approaches all have similar challenges as a primary solution to Honolulu's transportation problems. They do not reduce congestion, increase the reliability of the transportation system, serve future land use plans, or improve the fairness of and access to the transportation system. While the Managed Lane Alternative would reduce freeway congestion (measured as vehicle hours of delay), it would increase overall system congestion by inducing additional travelers to drive, which would result in increased congestion on arterial and collector facilities accessing the freeways and the managed lane. In addition, once a vehicle leaves the managed lane, that vehicle is still subjected to congestion on surrounding roadways. They also do not offer an alternative to perpetuating a reliance on limited existing travel modes. For example, localized bypasses would not meet system goals for corridor-wide benefits to mobility, reliability, access, and equity. In sum, they do not address the Purpose and Need of the Project.

To address your conclusion and recommendation, the Managed Lane Alternative as proposed by Ann Kobayashi and Professor Prevedourous were evaluated and subsequently eliminated from further consideration. Their proposal is similar to the Managed Lane Alternative that was thoroughly evaluated in the Alternatives Analysis, which also accommodated both single occupant and transit vehicles. As stated previously, there could be many other versions of this type of system with minor adaptations to suit one or another special concern. In the end, the above approaches all have similar challenges as a primary solution to Honolulu's transportation problems. Please see points a. and b. above regarding cost estimates for the Managed Lane Alternative.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
Creation Date :	12/29/2008
Creator Affiliation :	
First Name :	Ben
Last Name :	Ramelb
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Submission Method :	Website
Other Submission Method :	
Submission Date :	12/29/2008

Submission Content/Notes : 29 December, 2008

To:
Mr. Wayne Yoshioka
Director Department of Transportation Services
City and County of Honolulu
650 South King St. 3rd Floor
Honolulu
HI 96813
FAX: (808) 587-6080

Subject: Comment on Draft Environmental Impact Statement (DEIS) "Honolulu High-capacity transit corridor Project", Issue : The purpose and needs statement of the project in the DEIS is flawed because it does not comply with the Notice of Intent (NOI) dated 7 Nov 2005.

Discussion: DEIS page 1-19 states" The purpose of the Honolulu High Capacity transit Corridor Project is to provide high capacity rapid transit in the highly congested east-west transportation corridor between Kapolei and UH Manoa."

The NOI states that the Federal Transit Administration (FTA) and the City and County of Honolulu, Department of Transportation Services (DTS) intend to prepare an EIS (and Alternative Analysis (AA)) on a proposal by the City and County of Honolulu to implement transit improvements that potentially include high-capacity transit service in a 25-mile travel
corridor between Kapolei and the University of Hawaii at Manoa and Waikiki.

The DEIS does not comply with the purpose because the DEIS does not include a route assessment to Waikiki and to UH Manoa.

Conclusion: The purpose and needs statement of the project in the DEIS is flawed because the DEIS does not include a route assessment to Waikiki and to UH Manoa consistent with Notice of Intent (NOI) dated 7 Nov 2005.

Recommendation: Include an environmental impact statement for the full route to include all environmental impacts from Kaelaeloa to UH Manoa, to Ala Moana Shopping Center and to Waikiki.

Respectfully,

Ben Ramelb P.E.
1148 Ala Lilikoi St
Honolulu, HI
96818

Copy to:

1) Mr. Ted Matley

FTA Region IX
201 Mission St. Suite 1650
San Francisco, CA 94105
FAX 415-744-2726

2) Governor Linda Lingle
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DEPARTMENT OF TRANSPORTATION SERVICES

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MUFI HANNEMANN
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WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT10/09-336495

Mr. Ben Ramelb
1148 Ala Lilikoi Street
Honolulu, Hawaii 96818

Dear Mr. Ramelb:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal dated December 29, 2008 with subject [Comment on Draft Environmental Impact Statement (DEIS) "Honolulu High-capacity transit corridor Project", Issue: The purpose and needs statement of the project in the DEIS is flawed because it does not comply with the Notice of Intent (NOI) dated 7 Nov 2005]:

The December 2005 Notice of Intent was superseded by the March 2007 Notice of Intent for preparation of the NEPA EIS. The March 2007 Notice of Intent states: "Both alignment alternatives would have a future extension from Downtown Honolulu to UH Manoa with a future branch to Waikiki, and a future extension at the Waianae (western) end to Kalaeloa Boulevard in Kapolei." While the fixed guideway system directly connects East Kapolei to Ala Moana Center, the remainder of the study corridor is served by buses integrated with the system.

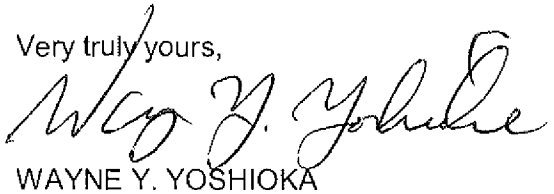
The Project has logical termini at East Kapolei and Ala Moana Center and independent utility from any extensions that may be constructed in the future. The future extensions to West

the City and FTA. If the future extensions are proposed for implementation in the future, environmental analysis of the extensions and appropriate alternatives will be undertaken at that time.

The December 2005 Notice of Intent was superseded by the March 2007 Notice of Intent for preparation of the NEPA EIS. The March 2007 Notice of Intent states: "Both alignment alternatives would have a future extension from Downtown Honolulu to UH Manoa with a future branch to Waikiki, and a future extension at the Waianae (western) end to Kalaeloa Boulevard in Kapolei." No Notice of Intent for the Project was issued in 2006. While the fixed guideway system directly connects East Kapolei to Ala Moana Center, the remainder of the study corridor is served by buses integrated with the system. Future extensions would be subject to a complete environmental review at the time they are proposed.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,



WAYNE Y. YOSHIOKA
Director

Enclosure

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Last Name :	Ramelb
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Submission Content/Notes : 29 December, 2008

To:
Mr. Wayne Yoshioka
Director Department of Transportation Services
City and County of Honolulu
650 South King St. 3rd Floor
Honolulu
HI 96813
FAX: (808) 587-6080

Subject: Comment on Draft Environmental Impact Statement (DEIS) "Honolulu High-capacity transit corridor Project", Issue : Rail will worsen net transit transportation in West Oahu Corridor despite fact that Raill will cost over $6 Billion

Fact: The 7 December 2005 Notice of Intent states "The Federal Transit Administration (FTA) and the City and County of Honolulu, Department of Transportation Services (DTS) intend to prepare an EIS (and Alternative Analysis (AA)) on a proposal by the City and County of Honolulu to implement transit improvements that potentially include high-capacity transit service in a 25-mile travel corridor between Kapolei and the University of Hawaii at Manoa.

Discussion:
1) The City Alternative Analysis , Table 3-12, shows that there will still be 17,500 vehicles per hour in 2030 on the H-1 (full rated capacity = 9,500 vehicles per hour) at Pearl City AFTER the $7.0 Billion Rail is built and operating.

2) The DEIS Screenline Volumes for the 2030 Salt Lake Build Alternative is shown on Table 3-20, page 3-38.

a) With the Salt Lake Build Alternative AT Screen line "D":
- Kalauao Koko Head bound : Observed (forecast) Volume - AM Peak = 18,910 vehicles per hour (vph)) - Reference: DEIS Table 3-20.
- Facility 2030 Capacity - AM Peak = 14, 650 vph - Reference: Table 3-12 Alternative Analysis.

Result: There will be 4,260 vph above the facility (H-1+HOV+Zipper+Kam+ Moanalua) capacity at Kalauao which indicates a Level of Service (LOS) F AFTER the Salt Lake Rail is built. This conclusion is consistent with the conclusion using the numbers from the City's Alternative analysis report. With rail, the above numbers show congestion will WORSEN after the $7.0 Billion Full build out Rail is completed.

b) With the Salt Lake Build Alternative AT Screen line "F":
- Kapalama Canal Koko Head bound : Observed (forecast) Volume - AM Peak = 20,760 vehicles per hour (vph)) - Reference: Table 3-20.
- Facility 2030 Capacity - AM Peak = 15,300 vph - Reference: Table 3-12 Alternative Analysis

Result: The traffic volume will be 5,460 vph above the facility (Nimitz, Dillingham, North King, H-1, School St) capacity at Kapalama Canal which indicates a Level of Service (LOS) F AFTER the Salt Lake rail is built. This conclusion is consistent with the conclusion using the numbers from the City's Alternative analysis report. With rail, the above numbers show congestion will WORSEN after the $6.0 Billion Full build out Rail is completed.

Conclusion: The AA and DEIS fail in showing that Rail is a cost effective transit improvement because traffic congestion on H-1 will worsen from the current 11,000 vph to 17,500 vph in year 2030 (Alternative Analysis Table 3-12) despite building the $6.0 Billion Rail.

Recommendation: Delete Rail transit because it fails to provide "transit improvements" and instead results in worse traffic congestion on H-1 after the $6.0 Billion rail is built and operating. Consider other cost effective solutions to eliminate traffic congestion on H-1.

Respectfully,

Ben Ramelb P.E.
1148 Ala Lilikoi St
Honolulu, HI
96818

Copy to:
1) Mr. Ted Matley
FTA Region IX
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San Francisco, CA 94105
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DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT10/09-336497

Mr. Ben Ramelb
1148 Ala Lilikoi Street
Honolulu, Hawaii 96818

Dear Mr. Ramelb:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal dated December 29, 2008 with subject [Comment on Draft Environmental Impact Statement (DEIS) "Honolulu High-capacity transit corridor Project", Issue : Rail will worsen net transit transportation in West Oahu Corridor despite fact that Rail will cost over $6 Billion.

Conditions on the H-1 Freeway will be worse in 2030 under any circumstance and regardless of whether the fixed guideway, managed lane, or more buses are implemented. The Alternatives Analysis stated this. However, these conditions will be even worse if the rail system is not built. As shown in the Alternatives Analysis Report (DTS 2006b), the Managed Lane Alternative would not eliminate congestion and bottlenecks on the H-1 Freeway. Table 3-12 in the Alternative Analysis Report shows that, under the No Build Alternative, there would be 18,049 vehicles per hour (vph) operating on the H-1 Freeway in 2030. Vehicle volumes rise to 18,327 vph (Two-direction Option) or 18,419 vph (Reversible Option) with the Managed Lane Alternative, while traffic volumes decrease to 17,209 vph with the 20-mile Fixed Guideway Transit Alternative. Accordingly, the Fixed Guideway Transit Alternative will reduce traffic volumes from those projected under the 2030 No Build Alternative.

As shown in Table 6-1 of the Final EIS, the Project will cost $4.6 billion in 2009 dollars and $5.5 billion in inflated dollars, including finance charges.

Table 3-20 in the Draft EIS shows 20,800 vehicles per hour (vph) at the Kalauao screenline (virtual lines across the corridor used to measure total travel at that point) in the Koko Head-bound direction during the a.m. peak hour with the No Build Alternative. This number decreases 9 percent with the addition of the Salt Lake Alternative to 18,910 vph. Numbers have been updated for the Final EIS based on the Airport Alternative and refinements to the travel demand forecasting model to account for non-home-based direct-demand trips during off-peak periods. In addition, the air passenger model was updated to reflect current conditions. These revisions were made based on FTA direction. The updated results continue to show that traffic will decrease with the addition of the Project. Tables 3-9 and 3-10 in the Final EIS shows an 11 percent decrease in vph at this screenline during the a.m. peak hour in the Koko Head-bound direction and a 10 percent reduction during the p.m. peak hour in the Ewa-bound direction. This demonstrates that the fixed guideway system will decrease traffic congestion at this location.

Similar results were found at the Kapalama screenline. As shown in Tables 3-9 and 3-10 in the Final EIS, the Project will reduce vph at this screenline by 9 percent during the a.m. peak hour in the Koko Head-bound direction and by 5 percent during the p.m. peak hour in the Ewa-bound direction. Traffic will improve on the H-1 Freeway at this screenline in both directions during the a.m. and p.m. peak hour.

As stated above, the Final EIS shows that traffic volumes on the H-1 Freeway at the Kalauao and Kapalama screenlines will decrease with the addition of the fixed guideway system (Tables 3-9 and 3-10 in the Final EIS). Lastly, as shown in Table 6-1 of the Final EIS, the Project will cost $4.6 billion in 2009 dollars and $5.5 billion in inflated dollars, including finance charges.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
Creation Date :	12/29/2008
Creator Affiliation :	
***First Name* :**	Ben
Last Name :	Ramelb
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Submission Method :	Website
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Submission Date :	12/29/2008

Submission Content/Notes : 29 December, 2008

To:
Mr. Wayne Yoshioka
Director Department of Transportation Services
City and County of Honolulu
650 South King St. 3rd Floor
Honolulu
HI 96813
FAX: (808) 587-6080

Subject: Comment on Draft Environmental Impact Statement (DEIS) "Honolulu High-capacity transit corridor Project", Issue : False and misleading DEIS statement on "Improve Corridor Mobility".

Fact:
Para. 1.8, pg. 1-20 states that transit improvements are needed to improve corridor mobility "because motorists and transit users experience substantial traffic congestion and delay at most times of the day.....Average speeds on the H-1 Freeway are currently less than 20 mph.... and will degrade even further by 2030."

Discussion:
The 2006 Alternative Analysis and DEIS propose Rail transit be built which will worsen traffic congestion on H-1 after tha Rail is built. The City Alternative Anelysis , Table 3-12, shows that there will still be 17,500 vehicles per hour in 2030 on the H-1 (full rated capacity = 9,500 vehicles per hour) at Pearl City AFTER the $7.0 Billion Rail is built and operating.

The DEIS Screenline Volumes for the 2030 Salt Lake Build Alternative Table 3-20, shows that with the Salt Lake Build Alternative AT Screen line "D" :
- Kalauao Koko Head bound : Observed (forecast) Volume - AM Peak = 18,910 vehicles per hour (vph).
- Facility 2030 Capacity - AM Peak = 14, 650 vph - Reference: Table 3-12 Alternative Analysis.

Result: There will be 4,260 vph above the facility (H-1 + HOV + Zipper + Kam+ Moanalua) capacity at Kalauao which indicates a Level of Service (LOS) F AFTER the Salt Lake Rail is built. This conclusion is consistent with the conclusion using the numbers from the City's Alternative analysis report. With rail, the above numbers show congestion will WORSEN after the $7.0 Billion Full build out Rail is completed.

The $7.0 Billion Steel wheel on steel rail transit system is NOT a cost effective means of providing improved mobility. A fully-elevated, steel-wheel rail transit system can move only 6,000 commuters (4000 standees, 2000 seated) per hour during peak travel periods while the 2030 commuter demand for RAIL will reach 15,600 commuters per hour, according to Table 3-12 of the Alternative Analysis. Similarly, Table 3-20 of the DEIS shows traffic overload on H-1 during peak travel periods.

Conclusion: The $7.0 Billion Steel Rail is not cost effective to substantially reduce or eliminate the bottlenecks on H-1 and will REDUCE MOBILITY which is contrary to the goal of the DEIS.

Recommendation: Reject the Steel Wheel on Steel Rail transit system and select other more cost effective transit systems which will improve mobility. Cost effective transit systems which will have the capacity to eliminate H-1 congestion include Managed Lane Alternative, BRT, EzWay or two highway bypasses around the H-1 bottlenecks at Pearl City and at Middle Street merge.

Respectfully,

Ben Ramelb P.E.
1148 Ala Lilikoi St
Honolulu, HI
96818

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2) Governor Linda Lingle
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MUFI HANNEMANN
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WAYNE Y. YOSHIOKA
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SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT10/09-336500

Mr. Ben Ramelb
1148 Ala Lilikoi Street
Honolulu, Hawaii 96818

Dear Mr. Ramelb:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal dated December 29, 2008 with subject [Comment on Draft Environmental Impact Statement (DEIS) "Honolulu High-capacity transit corridor Project", Issue: False and misleading DEIS statement on "Improve Corridor Mobility"]:

Conditions on the H-1 Freeway will be worse in 2030 under any circumstance and regardless of whether the fixed guideway, managed lane, or more buses are implemented. The Alternatives Analysis stated this. However, these conditions will be even worse if the rail system is not built. As shown in the Alternatives Analysis Report (DTS 2006b), the Managed Lane Alternative would not eliminate congestion and bottlenecks on the H-1 Freeway. Table 3-12 in the Alternative Analysis Report shows that, under the No Build Alternative, there would be 18,049 vehicles per hour (vph) operating on the H-1 Freeway in 2030. Vehicle volumes rise to 18,327 vph (Two-direction Option) or 18,419 vph (Reversible Option) with the Managed Lane Alternative, while traffic volumes decrease to 17,209 vph with the 20-mile Fixed Guideway

Transit Alternative. Accordingly, the Fixed Guideway Transit Alternative will reduce traffic volumes from those projected under the 2030 No Build Alternative.

As shown in Table 6-1 of the Final EIS, the Project will cost $4.6 billion in 2009 dollars and $5.5 billion in inflated dollars, including finance charges.

Table 3-20 in the Draft EIS shows 20,800 vehicles per hour (vph) at the Kalauao screenline (virtual lines across the corridor used to measure total travel at that point) in the Koko Head-bound direction during the a.m. peak hour with the No Build Alternative. This number decreases 9 percent with the addition of the Salt Lake Alternative to 18,910 vph. Numbers have been updated for the Final EIS based on the Airport Alternative and refinements to the travel demand forecasting model to account for non-home-based direct-demand trips (trips that do not originate or end at home) during off-peak periods. In addition, the air passenger model (which forecasts travel in the corridor related to passengers arriving or departing at Honolulu International Airport) was updated to reflect current conditions. These revisions were made based on consultation with FTA. The updated results continue to show that traffic will decrease with the addition of the Project. Tables 3-9 and 3-10 in the Final EIS shows an 11 percent decrease in vph at this screenline during the a.m. peak hour in the Koko Head-bound direction and a 10 percent reduction during the p.m. peak hour in the Ewa-bound direction. This demonstrates that the fixed guideway system will decrease traffic congestion at this location.

As stated in Chapter 3 of the Final EIS, the travel demand forecasting model predicts a maximum peak direction volume of 14,700 passengers during the a.m. two-hour peak period. As a result of updated ridership forecasts, the operating plan for the fixed guideway system has been revised and the system will have a minimum capacity of approximately 17,300 passengers per direction during the two-hour peak period. The fixed guideway system is planned to operate with two- or three-car trains with a capacity of between 325 and 500 passengers each. At three-minute headways during the peak period, that provides capacity for approximately 8,650 passengers per peak direction per peak hour. This capacity figure applies in both directions for a total system capacity of approximately 17,300 passengers per peak hour. The numbers presented in your comment understate the capacity of the fixed guideway by a substantial margin.

In addition, a major benefit of the fixed guideway is that once built, it is flexible enough to accommodate significant growth. For example, the full capacity of the fixed guideway with four-car trains and 90-second headways is over 25,000 passengers per hour per direction or over 50,000 in total. Accordingly, the fixed guideway system will provide sufficient capacity based on travel demand forecasting results.

As stated in Section 7.4 of the Final EIS, cost-effectiveness is one of the key criteria that FTA uses to evaluate projects proposed for Section 5309 New Starts funding. The cost-effectiveness indices for the Project compared to the baseline is within the "medium" range established by FTA for its New Starts ratings, which, along with other considerations, is currently required to qualify for New Starts funding (see Table 7-8 of the Final EIS). As shown in Table 6-1 of the Final EIS, the Project will cost $4.6 billion in 2009 dollars and $5.5 billion in inflated dollars, including finance charges.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

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Submission Content/Notes : 29 December, 2008

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Director Department of Transportation Services
City and County of Honolulu
650 South King St. 3rd Floor
Honolulu
HI 96813
FAX: (808) 587-6080

Subject: Comment on Draft Environmental Impact Statement (DEIS) "Honolulu High-capacity transit corridor Project", Issue False and misleading DEIS statement on Corridor Travel Reliability.

Fact:
Para. 1.8.2, pg. 1-20 states that "As more roadways become more congested.... because of traffic accidents or heavy rain..... a need exists to provide a more reliable transit system."

Discussion:
A fully-elevated, steel-wheel on steel rail transit system can move only 6,000 commuters (4000 standees, 2000 seated) per hour during peak travel periods while the 2030 commuter demand for RAIL will reach 15,600 commuters per hour, according to Table 3-12 of the Alternative Analysis.

Commuter demand of 15,600 commuters per hour in year 2030 is calculated thus:
City AA, Table 3-12 shows year 2030 forecast volume of 17,500 vph on H-1(full rated capacity = 9,500 vph) with the rail built and operating. Therefore, there is an overload on H-1 Freeway of 8,000 vph = 9,600 commuters per hour that needs to get on the $7.0 Billion Rail transit which already carries 6,000 commuters per hour.

The EzWay or Managed Lane alternatives have the capacity to accommodate the total 2030 demand. The Managed Lanes or EzWay will each have three lanes, each lane has a capacity of 2000 vph. For three lanes, the vehicular capacity is 6000 vehicles per hour. The Managed Lane Alternative person capacity is calculated thus:
Projected use of the HOT during peak hour includes:
200 express buses w/~5O pns = 10,000 pns
500 HOV5 (carpool) = 2,500 pns
500 vanpool (~5pns) = 2,500 pns.

Remaining excess capacity available for low occupancy green vehicles:
6,000 vph minus (200 + 500 + 500) = 4,800 vph. 4,800 low occupancy vehicles
Average persons per vehicle = 1.2 pns per vehicle
4,800 vehicles with 1.2 pns = 5700 pns
Summary: Managed Lane persons capacity = 10,000 + 2,500 +2,500 + 5,700 = ~ 20,700 pns

Conclusion:

There will be 9,600 + 6,000 = 15,600 commuters per hour that must get on the train during peak travel period. However, 9,600 commuters per hour will NOT be able to board the train because the train has insufficient commuter capacity during peak travel period. Therefore, the train cannot be considered a RELIABLE form of transit because it has insufficient commuter capacity.

Recommendation: Rail Transit should be eliminated as the preferred alterative because it does not meet the test of Travel Reliability. The DEIS should include cost effective transit systems which will have the capacity to eliminate H-1 congestion include Managed Lane Alternative, BRT, EzWay or two highway bypasses around the H-1 bottlenecks at Pearl City and at Middle Street merge.

Respectfully,

Ben Rameib P.E.
1148 Ala Lilikoi St
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96818

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June 11, 2010

RT10/09-366506

Mr. Ben Ramelb
1148 Ala Lilikoi Street
Honolulu, Hawaii 96818

Dear Mr. Ramelb:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address your comments received from agencies and the public on the Draft EIS. The following paragraphs address comments regarding the above-referenced submittal dated December 29, 2008 with subject [Comment on Draft Environmental Impact Statement (DEIS) "Honolulu High-capacity transit corridor Project", Issue False and misleading DEIS statement on Corridor Travel Reliability]:

Since the Draft EIS was published, the travel demand model has been refined by adding an updated air passenger model (which forecasts travel in the corridor related to passengers arriving or departing at Honolulu International Airport), defining more realistic drive access modes (driving alone or car pooling) to project stations and recognizing a more robust off-peak non-home-based direct demand element (trips that do not originate at home) based on travel surveys in Honolulu. These revisions were made in consultation with FTA. As stated in Chapter 3 of the Final EIS, the travel demand forecasting model predicts a maximum peak direction volume of 14,700 passengers during the a.m. two-hour peak period. As a result of updated ridership forecasts, the operating plan for the fixed guideway system has been revised and the system will have a minimum capacity of approximately 17,300 passengers per direction

during the two-hour peak period. The fixed guideway system is planned to operate with two or three car trains with a capacity of between 325 and 500 passengers each. At three-minute headways during the peak period, that provides capacity for approximately 8,650 passengers per peak direction per peak hour. This capacity figure applies in both directions for a total system capacity of approximately 17,300 passengers per peak hour. The numbers presented in your comment understate the capacity of the fixed guideway by a substantial margin.

In addition, a major benefit of the fixed guideway is that once built, it is flexible enough to accommodate significant growth. For example, the full capacity of the fixed guideway with four-car trains and 90-second headways is over 25,000 passengers per hour per direction or over 50,000 in total. Accordingly, the fixed guideway system will provide sufficient capacity based on travel demand forecasting results.

As stated in Chapter 2 of the Final EIS, the Managed Lane Alternative was evaluated for its ability to meet project goals and objectives related to mobility and accessibility, supporting planned growth and economic development, constructability and cost, community and environmental quality, and planning consistency. The Managed Lane Alternative would fail to meet the Project's Purpose and Need, as described in Chapter 1 of this Final EIS, because it fails to moderate anticipated traffic congestion. While this alternative would have reduced congestion on parallel highways, system-wide traffic congestion would have been similar to the No Build Alternative as a result of increased traffic on arterials trying to access the facility. Total islandwide vehicle hours of delay would have increased with the Managed Lane Alternative compared to the No Build Alternative, indicating an increase in system-wide congestion (see Table 2-2 in the Final EIS). It also would be less effective than the Fixed Guideway Alternative at providing a faster and more reliable public transportation service as well as an alternative to private automobile travel. The Managed Lane Alternative would not have supported planned concentrated future population and employment growth because it would not provide concentrations of transit service that would serve as a nucleus for transit-oriented development.

There could be many versions of an EzWay or Managed Lane system with minor adaptations to suit one or another special concern. In the end, the above approaches all have similar challenges as a primary solution to Honolulu's transportation problems. They do not reduce congestion, increase the reliability of the transportation system, serve future land use plans, or improve the fairness of and access to the transportation system. While the Managed Lane Alternative would reduce freeway congestion (measured as vehicle hours of delay), it would increase overall system congestion by inducing additional travelers to drive, which would result in increased congestion on arterial and collector facilities accessing the freeways and the managed lane. In addition, once a vehicle leaves the managed lane, that vehicle is still subjected to congestion on surrounding roadways. They also do not offer an alternative to perpetuating a reliance on limited existing travel modes. For example, localized bypasses would not meet system goals for corridor-wide benefits to mobility, reliability, access, and equity. In sum, they do not address the Purpose and Need of the Project.

After the Alternatives Analysis was completed, several scoping comments were received requesting reconsideration of the Managed Lane Alternative that was considered and rejected during the Alternatives Analysis. Because no new information was provided that would have

changed the findings of the Alternatives Analysis regarding the Managed Lane Alternative, it was not included in the Draft EIS for further consideration.

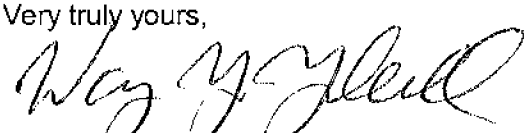
In response to your conclusion, the fixed guideway system will have sufficient capacity to meet demand, as stated previously. In addition, as stated in Chapter 3 of the Final EIS, the fixed guideway system will be reliable because it will operate in an exclusive right-of-way. This reliability would not deteriorate over time, even with projected population growth and resulting added traffic volumes in the study corridor.

As stated in Section 7.4 of the Final EIS, cost-effectiveness is one of the key criteria that FTA uses to evaluate projects proposed for Section 5309 New Starts funding. The cost-effectiveness indices for the Project compared to the baseline is within the "medium" range established by FTA for its New Starts ratings, which, along with other considerations, is currently required to qualify for New Starts funding (see Table 7-8 in the Final EIS). As shown in Table 6-1 of the Final EIS, the Project will cost $4.6 billion in 2009 dollars and $5.5 billion in inflated dollars, including finance charges.

Scoping for the EIS followed the FTA process that provides for a culling of alternatives studied in the EIS through an Alternatives Analysis. The scoping process initiated for the Alternatives Analysis included a variety of highway, bus and fixed guideway options for consideration. During the later scoping effort for the EIS, the public was requested to propose alternatives that would satisfy the purpose and need at less cost or with greater effectiveness, less environmental or community impact and to propose alternatives that were not previously studied and eliminated for good cause. The only alternative that emerged that met these criteria was a fixed-guideway alternative following several alternative alignments. All reasonable alternatives that emerged from these processes were ultimately evaluated in the Draft and Final EISs.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,



WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
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Submission Date :	12/29/2008

Submission Content/Notes : 29 December, 2008

To:
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Director Department of Transportation Services
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Subject: Comment on Draft Environmental Impact Statement (DEIS) "Honolulu High-capacity transit corridor Project", Issue : DEIS incorrectly compares rail alternatives with No-Build Alternatives.

Discussion:
DEIS pg. 4-1 states "In this document, the No Build Alternative serves as an environmental baseline to which the impacts of other alternatives are compared."

The DEIS contains only rail alternatives and a "No-build" alternative which wrongfully draws conclusions detrimental to the environment. There are other low-cost alternatives considered superior in providing traffic relief and cost which were wrongfully deleted or not included in the DEIS and Alternative Analysis.

These cost effective transit alternatives include an 11 mile Managed Lane, a 15 Mile EzWay, a BRT fixed Guideway and two highway bypasses around the bottlenecks at Pearl City and at Middle Street Merge. All of these alternatives would cost no more than $1.2 Billion and would eliminate the bottlenecks at Pearl City and at Middle Street Merge.

Conversely, the Steel wheel on steel rail alternatives included in the DEIS ALL cost no less than $6.28 Billion (Table 6-2 DEIS). Moreover, after the $6.28 Billion Rail is built and operating, traffic congestion on H-1 will worsen as shown on table 3-12 of the Alternative Analysis and on DEIS Table 3-20. The AA shows 17,500 vehicles per hour on the H-1 freeway (rated full capacity = 9,500 vph). The DEIS Table 3-20 shows there will be 4,200 vph above the vehicle capacity of the highway facilities heading Koko Head bound during the morning peak period.

Conclusion: If the DEIS Rail alternatives are compared with the other transit alternatives including Managed Lanes, EzWay, BRT, and bypass highways, each rail alternative would be inferior to the "other" transit alternatives, both in terms of cost effectiveness and for providing traffic relief.

Recommendation:
The DEIS must add more transit alternatives such as BRT, Managed Lane, EzWay, and two bypass highways, into the DEIS which can then be compared with the rail alternatives to arrive at a more logical locally

preferred alternative (LPA):

1) an elevated HOV three-lane transit way from Waikele to downtown Hotel and Alakea Sts as described in Professor Panos Prevedouros Report "Transportation Alternatives Analysis for Mitigating Traffic Congestion between Leeward Oahu and Honolulu, Mar 2008." The full report is available at www.eng.hawaii.edu/~panos/UHCS.pdf.
2) BRT proposed by former Mayor Harris in early 2002 0or 2003.

3) Build two separate, three-lane Flyovers, Nimitz and Kamehameha (between Waiawa Interchange and Halawa Interchange). Note that the two Flyovers have the capacity to eliminate the bottlenecks on H-1.

Respectfully,

Ben Ramelb P.E.
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96818

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DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT10/09-336512

Mr. Ben Ramelb
1148 Ala Lilikoi Street
Honolulu, Hawaii 96818

Dear Mr. Ramelb:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address your comments received from agencies and the public on the Draft EIS. The following paragraphs address comments regarding the above-referenced submittal dated December 29, 2008 with subject [Comment on Draft Environmental Impact Statement (DEIS) "Honolulu High-capacity transit corridor Project", Issue: DEIS incorrectly compares rail alternatives with No-Build Alternatives]:

Chapter 2 of the Final EIS summarizes the alternatives screening and selection process. Beginning in the fall of 2005, an initial screening process considered alternatives identified through previous transit studies, a field review of the study corridor, an analysis of current population and employment data for the study corridor, a literature review of technology modes, ongoing work completed as part of the Oahu Regional Transportation Plan 2030 (ORTP) prepared by the Oahu Metropolitan Planning Organization (OahuMPO) (OahuMPO 2007), and public and agency comments received during the formal Alternatives Analysis scoping process.

The screening process is documented in the Honolulu High-Capacity Transit Corridor Project Alternatives Screening Memorandum (DTS 2006a). Three scoping meetings were held during the screening process in December 2005, which included a presentation of initial alternatives to the public, interested agencies, and officials to receive comments on the Purpose

and Need, alternatives, and scope of the Alternatives Analysis. Refinements were made to the alternatives based on the public input during scoping.

After completion of screening in the winter of 2006, the following alternatives were studied in the Alternatives Analysis: No Build Alternative, Transportation System Management (TSM) Alternative, Managed Lane Alternative, and the Fixed Guideway Alternative. After review of the Alternatives Analysis Report and consideration of public comments, the City Council identified a fixed guideway transit system extending from Kapolei to UH Manoa with a connection to Waikiki as the Locally Preferred Alternative. This identification, which eliminated the TSM and Managed Lane Alternatives from further consideration, became Ordinance 07-001 on January 6, 2007. The NEPA process considered a range of alternatives that was consistent with the identified Locally Preferred Alternative. As discussed in Section 2.2, there were no alternatives that had not been previously studied and eliminated for good cause that would satisfy the Purpose and Need at less cost, with greater effectiveness, or less environmental or community impact.

The No Build Alternative is a baseline required as part of the NEPA process. All alternatives studied in both the Alternatives Analysis and EIS used the No Build Alternative as a baseline when analyzing the benefits, costs, and impacts of the projects studied.

As stated in Chapter 2 of the Final EIS, the Managed Lane Alternative was evaluated for its ability to meet project goals and objectives related to mobility and accessibility, supporting planned growth and economic development, constructability and cost, community and environmental quality, and planning consistency. The Managed Lane Alternative would fail to meet the Project's Purpose and Need, as described in Chapter 1 of this Final EIS, because it fails to moderate anticipated traffic congestion. While this alternative would have reduced congestion on parallel highways, systemwide traffic congestion would have been similar to the No Build Alternative as a result of increased traffic on arterials trying to access the facility. Total islandwide vehicle hours of delay would have increased with the Managed Lane Alternative compared to the No Build Alternative, indicating an increase in system-wide congestion (see Table 2-2 in the Final EIS). It also would be less effective than the Fixed Guideway Alternative at providing a faster and more reliable public transportation service as well as an alternative to private automobile travel. The Managed Lane Alternative would not have supported planned concentrated future population and employment growth because it would not provide concentrations of transit service that would serve as a nucleus for transit-oriented development.

The EzWay 15-mile, three-lane viaduct concept was developed as a hybrid of a plan for elevated toll lanes and some form of rubber-tire-on-concrete transit system. It is similar to the Managed Lane Alternative that was thoroughly evaluated in the Alternatives Analysis, which also accommodated both single occupant and transit vehicles. No known cost estimate for the EzWay proposal was prepared or validated by a qualified registered Professional Engineer. Options evaluated and rejected during the Primary Corridor Transportation Project (1998-2002) and Alternatives Analysis include an exclusively at-grade fixed-guideway system using bus rapid transit vehicles. In addition to comments received during the Alternatives Analysis and EIS scoping sessions, these studies provided a critical foundation for the conclusion that an elevated system would result in the best overall performance and better support the Purpose and Need for the Project. In addition, the Bus Rapid Transit Alternative, as stated in your letter, is a variation of the Transportation System Management Alternative that was evaluated in the

Alternatives Analysis. While this alternative has merit for cost-effectiveness, its overall system benefit would be very low.

Localized bypasses would not meet system goals for corridor-wide benefits to mobility, reliability, access, and equity. The Hawaii Department of Transportation, which is responsible for the freeway system, has evaluated needs for the freeway system and identified the highway projects that would be most efficient at reducing congestion on Oahu. The projects, including a Nimitz Flyover, are listed in Table 2-3 of the Draft EIS and included in the analysis for all project alternatives. Effects of the Nimitz Flyover on traffic conditions in 2030 are discussed in Section 3.4.2 of the Final EIS. Travel on the Nimitz Flyover was included for the following travel pairs under the No Build Alternative: Kapolei to Downtown, Ewa to Downtown, and Mililani to Downtown. As shown in Figure 3-7 of the Final EIS, the Nimitz Flyover does improve transit travel times with the No Build Alternative between certain travel pairs (e.g., between Mililani and Downtown) compared to 2007 conditions. However, as also shown in this figure, travel times improve substantially more with the addition of the Project.

As a point of reference, the State of Hawaii's Highway Modernization Plan dated January 22, 2009, estimates the cost of the Nimitz Viaduct at $600 million for an approximately 2.5-mile elevated highway with two lanes, which equals $240 million per mile. Using this estimate, a 15-mile facility would cost approximately $3.6 billion.

To address your statement about the cost of the Project, Table 6-2 in the Draft EIS estimates the costs for implementing, replacing, rehabilitating, and maintaining the fixed guideway service. This table also includes the costs to restructure and expand TheBus and TheHandi-Van network. As shown in Table 6-1 of the Final EIS, the Project will cost $4.6 billion in 2009 dollars and $5.5 billion in inflated dollars, including finance charges.

As shown in the Alternatives Analysis Report (DTS 2006b), the Managed Lane Alternative would not eliminate congestion and bottlenecks on the H-1 Freeway. Table 3-12 in the Alternative Analysis Report shows that, under the No Build Alternative, there would be 18,049 vehicles per hour (vph) operating on the H-1 Freeway in 2030. Vehicle volumes rise to 18,327 vph (Two-direction Option) or 18,419 vph (Reversible Option) with the Managed Lane Alternative, while traffic volumes decrease to 17,209 vph with the 20-mile Fixed Guideway Transit Alternative. Accordingly, the Fixed Guideway Transit Alternative will reduce traffic volumes from those projected under the 2030 No Build Alternative.

Table 3-20 in the Draft EIS shows 20,800 vehicles per hour (vph) at the Kalauao screenline (virtual lines across the corridor used to measure total travel at that point) in the Koko Head-bound direction during the a.m. peak hour with the No Build Alternative. This number decreases 9 percent with the addition of the Salt Lake Alternative to 18,910 vph. Numbers have been updated for the Final EIS based on the Airport Alternative and refinements to the travel demand forecasting model to account for non-home-based direct-demand trips (trips that do not originate or end at home) during off-peak periods. In addition, the air passenger model (which forecasts travel in the corridor related to passengers arriving or departing at Honolulu International Airport) was updated to reflect current conditions. These revisions were made based on consultation with FTA. The updated results continue to show that traffic will decrease with the addition of the Project. Tables 3-9 and 3-10 in the Final EIS shows an 11 percent decrease in vph at this screenline during the a.m. peak hour in the Koko Head-bound direction

and a 10 percent reduction during the p.m. peak hour in the Ewa-bound direction. This demonstrates that the fixed guideway system will decrease traffic congestion at this location.

During the scoping process, several comments were received requesting reconsideration of the Managed Lane Alternative. This was considered and rejected during the Alternatives Analysis process. Because no new information was provided that would have substantially changed the findings of the Alternatives Analysis process regarding the Managed Lane Alternative, this alternative was not included in the Draft or Final EISs.

The Alternatives Analysis fully evaluated the Managed Lane Alternative and documented that it performed poorly compared to the Fixed Guideway Transit Alternative on a broad range of metrics. Any slight changes to the alternative would not result in substantially different findings.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
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Other Submission Method :	
Submission Date :	12/29/2008

Submission Content/Notes : 29 December, 2008

To:
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FAX: (808) 587-6080

Subject: Comment on Draft Environmental Impact Statement (DEIS) "Honolulu High-capacity transit corridor Project", Issue : DEIS should compare environmental impacts between Rail and Managed Lane Alternative

Discussion:
DEIS pg. 4-1 states "In this document, the No Build Alternative serves as an environmental baseline to which the impacts of other alternatives are compared." The DEIS and AA should compare environmental impacts between Rail and Managed Lane Alternative as follows:

A comparison of Managed Lane Alternative versus Rail:
Cost:
Rail - $6.0 + Billion
Managed Lane - Less than $1.0 Billion (Similar length Tampa reversible three lane elevated expressway cost $320 million in year 2005)

Length of new elevated fixed guideway:
Rail - 28 miles. Kapolei, Farrington Hwy to Waipahu, Kamehameha Hwy to
Aiea, Salt Lake Blvd, Mapunapuna, Dillingham, Nimitz, Halekauwila, Kapiolani, Kona (Ala Moana Shopping Center), Kapiolani, Kalakaua, Kuhio (Waikiki); Kapiolani,
University Ave. (U.H. Manoa).

Managed Lane - 11 Miles. Over Kam Hwy median (H-1/H-2 Merge to Pearl Harbor), alongside (mauka) H-1 Viaduct to Keehi Lagoon, over Nimitz hwy to Iwilei thence to Hotel
Street and underpass to Alakea St and Halekauwila Street. Use King and Beretania (couplet) on grade.

Traffic congestion:
Rail – Alternative Analysis Table 3-12 shows 17,500 vph on H-1 (full rated capacity =9,500 vph) at Kalauao. Rail will worsen traffic congestion on H-1. 9,600 commuters per hour will be stuck in gridlock on H-1 during am peak hour or delayed in catching mostly fully loaded train cars at train stations.
Managed Lane - Will reduce congestion on H-1 by 35 percent and has the traffic capacity to eliminate
H-1 bottlenecks at Pearl City and at Middle St. merge..

Stations:

Rail - Will have 34 four-story or higher rail stations
Managed Lane - Zero bus stations.

Rail Stops:
Rail - Minimum 19 rail stops outside of Honolulu.
Managed Lane - Zero bus stops between community transit center and Honolulu

Transfers:
Rail - At least two transfers, home to bus to rail to another bus in town)
Managed Lane - None. Bus will travel directly from community to destination.

Travel time:
Rail - will not reduce travel time due to required transfers (bus to rail to bus).
Managed Lane - reduce travel time by 34 percent in automobile and bus travel
times along the Leeward Corridor from current levels.

Bypass Road
Rail - Railway not available for highway bypass due to accident on H-1
Managed Lane - Reversible highway available 24/7.

Land Acquisition
Rail - Much acquisition needed for Rail stations, vehicular parking lots and rail yards.
Managed Lane - Land required for busyard in Kapolei.

Funding
Rail - GET taxes plus property tax . Fed fund unlikely because Feds recently cut rail funds for Wash. DC to Dulles Airport.
Managed Lane - funded by Feds FHWA, FTA and municipal bonds.
GET funds could be made available with change in law.

Visual Blight
Rail - Will be an 28 mile elevated environmental blight on Honolulu. Elevated tracks will be ugly, running through downtown and eventually Waikiki, defacing our beautiful city and damaging our tourist industry.
Managed Lane – 11 mile elevated outside of Honolulu only.

Air pollution
Rail is not Green. Rail uses more energy per passenger mile than our buses or cars. Trains will continue at 10 minute schedule during non-peak hours with few passengers. Rail will not eliminate H-1 bottlenecks at Pearl City which will cause 8000 vehicles per hour stuck in gridlock on H-1 resulting in greater pollution than MLA.
Managed Lane – Has capacity to eliminate H-1 bottlenecks thereby reducing air pollution relative to rail.

Travel Speed
Rail - is slow, averaging 25 mph with 19 rail stops outside of Honolulu. There are no express trains.

Managed Lane – Non-stop 55 mph travel between each community and job destinations from Pearl Harbor and downtown .

Conclusion: If the DEIS Rail alternatives are compared with the other transit alternatives including Managed Lanes, EzWay, BRT, and bypass highways, each rail alternative would be inferior to the "other" transit alternatives, both in terms of cost effectiveness and for providing traffic relief.

Recommendation: The DEIS should include cost effective transit systems which will have the capacity to eliminate H-1 congestion include Managed Lane Alternative, BRT, EzWay or two highway bypasses around the H-1 bottlenecks at Pearl City and at Middle Street merge. These alternatives can then be compared with the rail alternatives to arrive at a more logical preferred alternative.

Respectfully,

Ben Rameib P.E.
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June 11, 2010

RT10/09-336528

Mr. Ben Ramelb
1148 Ala Lilikoi Street
Honolulu, Hawaii 96818

Dear Mr. Ramelb:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal dated December 29, 2008 with subject [Comment on Draft Environmental Impact Statement (DEIS) "Honolulu High-capacity transit corridor Project", Issue: DEIS should compare environmental impacts between Rail and Managed Lane Alternative]:

The No Build Alternative is a baseline required as part of the NEPA process. All alternatives studied in both the Alternatives Analysis and EIS used the No Build Alternative as a baseline when analyzing the benefits, costs, and impacts of the projects studied.

The engineering cost estimate for a two-lane reversible managed lane facility, which was calculated following the same rigorous cost-estimating process used for the Fixed Guideway Transit Alternatives, was $2.6 billion in 2006 dollars. As stated in the City Council's Transit Advisory Task Force Report, a committee was charged with reviewing cost estimates for the two Alternatives involving construction (Managed Lane Alternative and Fixed Guideway Alternative). The report states that, "the Task Force agrees with this committee that the Alternatives Analysis'

construction cost estimates were fairly and consistently prepared, and that they may be used for both planning and cost comparisons." Information was obtained by the Task Force from the Hawaii Department of Transportation and others familiar with managed lane facilities. It is the only estimate to date that addresses Honolulu conditions. The construction cost estimate for the Project is $4.6 billion in 2009 dollars.

There is no substantiation of the estimate from the Tampa Bay toll facility being applicable in Honolulu. The designer of the Tampa Bay facility herself admitted that to apply such an estimate without detailed consideration of the many differences between the two locations is not reasonable. For clarification, the Tampa Bay elevated toll lanes extend only 5.8 miles within the 10-mile expressway. The costs quoted are from 2002, long before the costs of materials and construction rose dramatically after 2004. Furthermore, the corridor within which the Tampa Bay lanes are built required no right-of-way, had no significant utility conflicts, no major structures or crossings, and was built in much more favorable geotechnical conditions than exist on Oahu. In addition, the Transit Task Force Report dated December 14, 2006, states that "the committee concluded that the projects are sufficiently different (actual costs versus projected costs with contingencies; available, accessible ROW vs. construction in actively used highways; no utilities relocation vs. extensive relocations) as to make the comparison unreasonable."

In addition, the length of the Project is 20 miles. The length of the Managed Lane Alternative studied during the Alternatives Analysis was 16 miles.

To address your statements about traffic, traffic volumes in 2030 under any alternative will be higher than those observed under current conditions. As shown in the Alternatives Analysis Report (DTS 2006b), the Managed Lane Alternative would not eliminate congestion and bottlenecks on the H-1 Freeway. Table 3-12 in the Alternative Analysis Report shows that, under the No Build Alternative, there would be 18,049 vehicles per hour (vph) operating on the H-1 Freeway in 2030. Vehicle volumes rise to 18,327 vph (Two-direction Option) or 18,419 vph (Reversible Option) with the Managed Lane Alternative, while traffic volumes decrease to 17,209 vph with the 20-mile Fixed Guideway Transit Alternative. Accordingly, the Fixed Guideway Transit Alternative will reduce traffic volumes from those projected under the 2030 No Build Alternative.

We would like to correct several comments in your letter under the headings of stations and rail stops. The Project includes 21 stations that will be various distances above the ground. A trip on the fixed guideway system from East Kapolei to Ala Moana Center would take 42 minutes, including dwell time at stations.

Regarding transfers, as stated in Chapter 3 of the Final EIS, with the Project, the rate of transfers will be higher than under the No Build Alternative due to proposed changes in local bus service to maximize access to the fixed guideway system. However, because of the high frequency of the fixed guideway service (three-minute headways between trains during peak periods), riders transferring from buses to the fixed guideway will experience minimal wait times. Riders transferring from the guideway service to buses will benefit from improved frequencies on existing bus routes serving stations. In addition, several new routes with high frequencies will be provided as feeders to the guideway system. Since these routes will primarily operate in

residential areas, they will provide greater reliability versus routes operating along congested arterials. The travel demand forecasting model includes a time penalty for transfers. Ridership forecasts increase 44 percent over the No Build Alternative despite a higher rate of transfers. While people typically try to minimize transfers on any trip, the more fundamental criterion for making a trip decision is how long the trip takes. Rail will offer people a shorter overall trip time compared to other options, even with the transfers as noted in Section 3.4.2 of the Final EIS.

Regarding travel time, as shown in Table 3-6 of the Alternatives Analysis, in the majority of instances the Managed Lane Alternative would have resulted in substantially greater transit travel times than the Fixed Guideway Transit Alternative. For example, from Waipahu to Downtown transit travel time for the Managed Lane Alternative would have been 52 minutes compared to 41 minutes for the Fixed Guideway Transit Alternative.

Regarding a bypass road, the fixed guideway system would provide an alternative to the H-1 Freeway if the freeway were closed.

To address your statement on land acquisition, property acquisitions are discussed in Section 4.4 of the Final EIS. The Project has been developed with a goal to minimize property takes and the need to relocate businesses and households. The Managed Lane Alternative would have affected up to 49 parcels. Of this total, two parcels were identified as residential, and up to 47 parcels with commercial/office and other uses would be affected. Parcels affected by right-of-way acquisition may include condominium or apartment buildings where multiple dwelling units could be affected, as well as single-family residences.

Your letter also contained comments about project funding that we would like to respond to. The Alternatives Analysis showed after extensive analysis that the other options would be ineffective at addressing the key transportation needs in Honolulu compared to the fixed guideway and at nearly comparable cost. No credible evidence has been developed to justify further consideration of those options. By law, no property tax revenues can be used to construct the Project. All capital costs, including finance charges, will be funded with FTA Section 5307 and FTA Section 5309 New Starts funds and County General Excise and Use Tax surcharge revenues. Regarding the Washington, D.C. to Dulles Airport rail project, FTA is providing $900 million under a Full Funding Grant Agreement. There has been no indication that the Project will not receive Federal funding.

As stated in Chapter 2 of the Final EIS, the Managed Lane Alternative would not have qualified for local excise and use tax surcharge funding. Because single-occupant vehicles would have been permitted, even if tolled, Federal New Starts funding could not have been used. Because the Managed Lane Alternative would not have met the Project's Purpose and Need, would not have resulted in substantially fewer environmental impacts, and would not have been financially feasible, it is not a practicable alternative.

Regarding visual blight, the island's unique visual character and scenic beauty were considered in the visual and aesthetic analysis presented in the Draft and Final EISs. As discussed in Section 4.8 of the Final EIS, the Project will be set in an urban context where visual change is expected and differences in scales of structures are typical. The following measures

will be included with the Project to minimize negative visual effects and enhance the visual and aesthetic opportunities that it creates:

- *Develop and apply design guidelines that will establish a consistent design framework for the Project with consideration of local context.*
- *Coordinate the project design with the City's transit-oriented development program within the Department of Planning and Permitting.*
- *Consult with the communities surrounding each station for input on station design elements.*
- *Consider specific sites for landscaping and trees during Final Design when plans for new plantings will be prepared by a landscape architect. Landscape and streetscape improvements will mitigate potential visual impacts.*

The Project also will provide users, including tourists, with expansive views from several portions of the corridor by elevating riders above highway traffic, street trees, and low structures adjacent to the alignment. In Section 4.8.3 of the Final EIS specific environmental, architectural, and landscape design criteria are listed that will help minimize visual effects of the Project.

The Managed Lane Alternative would have extended a shorter distance, but it would have been more visually intrusive because its elevated structure, with a typical width of between 36 and 46 feet, would have been much wider than that of the Fixed Guideway Alternative.

Likewise, to address your comments on air pollution, an average rail system consumes 2,784 British thermal units (BTUs) of energy per passenger-mile of service. An average passenger vehicle consumes 3,512 BTUs of energy per passenger-mile (USDOE 2008). As discussed in Chapter 4 of the Final EIS, the Project is anticipated to reduce daily transportation energy demand by approximately 3 percent compared to the No Build Alternative. The findings of the Alternatives Analysis demonstrated that the Reversible Option of the Managed Lane Alternative would have resulted in a net increase in transportation energy consumption and air pollution emissions.

As shown in the Alternatives Analysis Report (DTS 2006b), the Managed Lane Alternative would not eliminate congestion and bottlenecks on the H-1 Freeway. Table 3-12 in the Alternative Analysis Report shows that, under the No Build Alternative, there would be 18,049 vehicles per hour (vph) operating on the H-1 Freeway in 2030. Vehicle volumes rise to 18,327 vph (Two-direction Option) or 18,419 vph (Reversible Option) with the Managed Lane Alternative, while traffic volumes decrease to 17,209 vph with the 20-mile Fixed Guideway Transit Alternative. Accordingly, the Fixed Guideway Transit Alternative will reduce traffic volumes from those projected under the 2030 No Build Alternative.

Next, regarding travel speed, the average speed of the fixed guideway system is greater than 30 miles per hour. Travel from one end of the system to the other will take 42 minutes.

To address your conclusion, non-rail alternatives were evaluated in the Alternative Analysis. Scoping for the NEPA process confirmed that no alternatives that had not been previously studied and eliminated for good cause would satisfy the Purpose and Need at less cost, with greater effectiveness, or with less environmental or community impact.

While the Managed Lane Alternative would reduce freeway congestion (measured as vehicle hours of delay), it would also increase overall system congestion by inducing additional travelers to drive, which would increase congestion on arterial and collector facilities accessing the freeways. System-wide congestion will be greater in 2030 than it is today. Spot-congestion in some locations could decrease with the Managed Lane Alternative; however, the Reversible Option of the Managed Lane Alternative would increase systemwide congestion compared to the No Build Alternative, while the Fixed Guideway Transit Alternative will decrease congestion compared to the No Build Alternative.

During the scoping process, several comments were received requesting reconsideration of the Managed Lane Alternative. This alternative was considered and rejected during the Alternatives Analysis process. Because no new information was provided that would have substantially changed the findings of the Alternatives Analysis process regarding the Managed Lane Alternative, this alternative is not included in the Draft or Final EISs.

As stated in Chapter 2 of the Final EIS, prior to selecting an elevated fixed guideway system, a variety of high-capacity transit options were evaluated during the Primary Corridor Transportation Project (1998-2002) and Alternatives Analysis. Options evaluated and rejected include an exclusively at-grade fixed-guideway system using bus rapid transit vehicles. In addition to comments received during the Alternatives Analysis and EIS scoping sessions, these studies provided a critical foundation for the conclusion that an elevated system would result in the best overall performance and better support of the Purpose and Need for the Project. In addition, the proposed Bus Rapid Transit Alternative, as stated in your letter, is a variation of the Transportation System Management Alternative that was evaluated in the Alternatives Analysis. While this alternative has merit for cost-effectiveness, its overall system benefit would be very low.

The EzWay 15-mile, three-lane viaduct concept was developed as a hybrid of a plan for elevated toll lanes and some form of rubber-tire-on-concrete transit system. It is similar to the Managed Lane Alternative that was thoroughly evaluated in the Alternatives Analysis, which also accommodated both single occupant and transit vehicles. No known cost estimate for the EzWay proposal was prepared or validated by a qualified registered professional engineer. As a point of reference, the State of Hawaii's Highway Modernization Plan dated January 22, 2009, estimates the cost of the Nimitz Viaduct at $600 million for an approximately 2.5-mile elevated highway with two lanes, which equals $240 million per mile. Using this estimate, a 15-mile facility would cost approximately $3.6 billion.

Localized bypasses would not meet system goals for corridor-wide benefits to mobility, reliability, access, and equity. The Hawaii Department of Transportation, which is responsible for the freeway system, has evaluated needs for the freeway system and identified the highway projects that would be most efficient at reducing congestion on Oahu. The projects, including a Nimitz Flyover, are listed in Table 2-3 of the Draft EIS and included in the analysis for all project

alternatives. Effects of the Nimitz Flyover on traffic conditions in 2030 are discussed in Section 3.4.2 of the Final EIS. Travel on the Nimitz Flyover was included for the following travel pairs under the No Build Alternative: Kapolei to Downtown, Ewa to Downtown, and Mililani to Downtown. As shown in Figure 3-7 of the Final EIS, the Nimitz Flyover does improve transit travel times with the No Build Alternative between certain travel pairs (e.g., between Mililani and Downtown) compared to 2007 conditions. However, as also shown in this figure, travel times improve substantially more with the addition of the Project. As a point of clarification, a Final EIS was never prepared for the Nimitz Flyover.

Conditions on the highway system will be worse in 2030 under any circumstances and whether the fixed guideway, managed lane, or more buses are implemented. As stated in the Alternatives Analysis Report, the comparison that is key to the Project is that rail service will improve conditions compared to what would occur if it were not provided (as shown in Tables 3-9 and 3-10 of the Final EIS). Accordingly, traffic conditions will be significantly better with the fixed guideway than with any of the other potential solutions studied.

As stated in Section 7.4 of the Final EIS, cost-effectiveness is one of the key criteria that FTA uses to evaluate projects proposed for Section 5309 New Starts funding. The cost-effectiveness indices for the Project compared to the baseline is within the "medium" range established by FTA for its New Starts ratings, which, along with other considerations, is currently required to qualify for New Starts funding (see Table 7-8 of the Final EIS). As shown in Table 6-1 of the Final EIS, the Project will cost $4.6 billion in 2009 dollars and $5.5 billion in inflated dollars, including finance charges.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
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Submission Date :	12/29/2008

Submission Content/Notes : 29 December, 2008

To:
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Subject: Comment on Draft Environmental Impact Statement (DEIS) "Honolulu High-capacity transit corridor Project", Issue : False and misleading DEIS statement to Improve Transportation Equity

Discussion:
Para. 1.8.4, pg. 1-21 states that "Equity is about fair distribution of resources so that no group carries an unfair burden of the negative environmental, social or economic impacts or receives and unfair of share o benefits. Many low-income and minority workers who commute to work in the PUC Development Plan area lie in the corridor outside of the urban core and thus rely heavily on transit availability. As more roadways become more congested.... because of traffic accidents or heavy rain..... a need exists to provide a more reliable transit system."

Discussion:

A fully-elevated, steel-wheel on steel rail transit system can move only 6,000 commuters (4000 standees, 2000 seated) per hour during peak travel periods while the 2030 commuter demand for RAIL will reach 15,600 commuters per hour, according to Table 3-12 of the Alternative Analysis.

Train commuter demand of 15,600 commuters per hour in year 2030 is calculated thus:
City AA, Table 3-12 shows year 2030 forecast volume of 17,500 vph on H-1 (full rated capacity = 9,500 vph) with the rail built and operating. Therefore, there is a commuter overload on H-1 Freeway of 8,000 vph = 9,600 commuters per hour. The total commuter load in 2030 = H-1 commuter overload plus 6,000 commuters on the Rail = 15,600 commuters per hour during peak.

The EzWay or Managed Lane alternatives each has the capacity to accommodate the total yr 2030 demand. The Managed Lanes or EzWay will each have elevated, reversible, three lanes each lane has a capacity of 2000 vph. For three lanes, the vehicular capacity is 6000 vehicles per hour. The Managed Lane Alternative person capacity is calculated thus:

Projected use of the HOT during peak hour includes:
200 express buses w/~50 pns = 10,000 pns
500 HOV5 (carpool) = 2,500 pns
500 vanpool (~5pns) = 2,500 pns.

Remaining excess capacity available for low occupancy green vehicles:
6,000 vph minus (200 + 500 + 500) = 4,800 vph. 4,800 low occupancy vehicles
Average persons per vehicle = 1.2 pns per vehicle
4,800 vehicles with 1.2 pns = 5700 pns
Summary: Managed Lane persons capacity = 10,000 + 2,500 +2,500 + 5,700 = ~ 20,700 pns

Conclusion:

There will be 9,600 + 6,000 = 15,600 commuters per hour that must get on the train during peak travel period. However, 9,600 commuters per hour will NOT be able to board the train because the train has insufficient commuter capacity during peak travel period. Therefore, the train cannot be considered as a form transit which provides transportation equity to many low-income and minority workers who commute to work in the PUC Development Plan area. Rail will impose an environmental injustice to low-income and minority commuters.

Recommendation: Rail Transit should be eliminated as the preferred alterative because it does not meet the test of improving transportation equity. The DEIS should include cost effective transit systems which will have the capacity to eliminate H-1 congestion include Managed Lane Alternative, BRT, EzWay or two highway bypasses around the H-1 bottlenecks at Pearl City and at Middle Street merge. These alternatives can then be compared with the rail alternatives to arrive at a more logical preferred alternative.

Respectfully,

Ben Ramelb P.E.
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WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT10/09-336533

Mr. Ben Ramelb
1148 Ala Lilikoi Street
Honolulu, Hawaii 96818

Dear Mr. Ramelb:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal dated December 29, 2008 with subject [Comment on Draft Environmental Impact Statement (DEIS) "Honolulu High-capacity transit corridor Project", Issue: False and misleading DEIS statement to Improve Transportation Equity]:

To address your comments about the capacity of the fixed guideway system and managed lane alternative, since the Draft EIS was published, the travel demand model has been refined by adding an updated air passenger model (which forecasts travel in the corridor related to passengers arriving or departing at Honolulu International Airport), defining more realistic drive access modes (driving alone or car pooling) to project stations and recognizing a more robust off-peak non-home-based direct demand element (trips that do not originate at home) based on travel surveys in Honolulu. These revisions were made based on consultation with FTA. As stated in Chapter 3 of the Final EIS, the travel demand forecasting model predicts a maximum peak direction volume of 14,700 passengers during the a.m. two-hour peak period. As a result of updated ridership forecasts, the operating plan for the fixed guideway system has

been revised and the system will have a minimum capacity of approximately 17,300 passengers per direction during the two-hour peak period. The fixed guideway system is planned to operate with two- or three-car trains with a capacity of between 325 and 500 passengers each. At three-minute headways during the peak period, that provides capacity for approximately 8,650 passengers per peak direction per peak hour. This figure applies in both directions for a total system capacity of approximately 17,300 passengers per peak hour. The numbers presented in your comment understate the capacity of the fixed guideway by a substantial margin.

In addition, a major benefit of the fixed guideway is that once built, it is flexible enough to accommodate significant growth. For example, the full capacity of the fixed guideway with four-car trains and 90-second headways is over 25,000 passengers per hour per direction or over 50,000 in total. Accordingly, the fixed guideway system will provide sufficient capacity based on travel demand forecasting results.

As discussed in Section 4.7 of the Final EIS, the effects of the Project were analyzed in regard to how well the Project will serve the transportation needs of the identified Environmental Justice (EJ) populations and communities of concern relative to all other population groups within the study corridor. Effects of the Project also will result in benefits to transit users. These benefits include increased transit options, improved mobility, proximity to transit links, and access to expanding employment opportunities. As Chapter 3 illustrates, traffic and transit performance will improve within the study corridor, and these benefits can be realized by all populations. There are 21 stations proposed for the Project. Nine are in or adjacent to Oahu Metropolitan Planning Organization (OahuMPO) EJ Areas. Therefore, people living in OahuMPO EJ Areas will have the same opportunity to access the transit and mobility improvements. With the additions to capacity stated above, no specific community will have diminished access or ability to use transit based on capacity. There will be no disproportionately high and adverse effects on residents and businesses in OahuMPO EJ Areas.

In addition, transit travel-time benefits will occur for several communities with high concentrations of transit-dependent households, as well as other defined groups within communities of concern (Figure 3-5 in Final EIS). Data collected and used as indicators for these communities of concern include linguistically isolated households, transit-dependent populations, and areas with public housing and community services. Substantial positive user benefits for communities of concern are shown in or near Waipahu, Pearl Harbor Naval Base, and Ala Moana Center. Overall, many communities of concern receive positive benefits from the Project. No community of concern will experience negative user benefits. Those areas with high transit dependence, such as Waipahu, Pearl City, Aiea, Kalihi, Iwilei, Chinatown, Downtown, Kakaako, Ala Moana, and Waikiki, benefit from more than 35 percent of the total user benefits.

In response to the recommendation and conclusion sections of your letter, as stated in Section 7.4 of the Final EIS, cost-effectiveness is one of the key criteria that FTA uses to evaluate projects proposed for Section 5309 New Starts funding. The cost-effectiveness indices for the Project compared to the baseline is within the "medium" range established by FTA for its New Starts ratings, which, along with other considerations, is currently required to qualify for

New Starts funding (Table 7-8 of Final EIS). As shown in Table 6-1 of the Final EIS, the Project will cost $4.6 billion in 2009 dollars and $5.5 billion in inflated dollars, including finance charges.

The Managed Lane Alternative was fully evaluated in the Alternatives Analysis. As shown in the Alternatives Analysis Report (DTS 2006b), the Managed Lane Alternative would not eliminate congestion and bottlenecks on the H-1 Freeway. Table 3-12 in the Alternative Analysis Report shows that, under the No Build Alternative, there would be 18,049 vehicles per hour (vph) operating on the H-1 Freeway in 2030. Vehicle volumes rise to 18,327 vph (Two-direction Option) or 18,419 vph (Reversible Option) with the Managed Lane Alternative, while traffic volumes decrease to 17,209 vph with the 20-mile Fixed Guideway Transit Alternative. Accordingly, the Fixed Guideway Transit Alternative will reduce traffic volumes from those projected under the 2030 No Build Alternative. The Alternatives Analysis fully evaluated the Managed Lane Alternative and documented that it performed poorly compared to the Fixed Guideway Transit Alternative on a broad range of metrics. Any slight changes to the alternative would not result in substantially different findings.

Non-rail alternatives were evaluated in the Alternative Analysis. Scoping for the NEPA process confirmed that no alternatives that had not been previously studied and eliminated for good cause would satisfy the Purpose and Need at less cost, with greater effectiveness, or with less environmental or community impact.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
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Submission Date :	12/29/2008

Submission Content/Notes : 29 December, 2008

To:
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Subject: Comment on Draft Environmental Impact Statement (DEIS) "Honolulu High-capacity transit corridor Project", Issue : DEIS should compare environmental baselines between Rail and other low-cost transit alternatives such as Managed Lanes, BRT, Ezway and No-build

Discussion:

DEIS pg. 4-1 states "In this document, the No Build Alternative serves as an environmental baseline to which the impacts of other alternatives are compared."

The DEIS contains only rail alternatives and a "No-build" alternative which draws wrong or biased conclusions with respect to the environment. There are other low-cost alternatives considered superior in providing traffic relief and cost which were wrongfully deleted or not included in the DEIS and Alternative Analysis.

Other cost effective transit alternatives include a) an 11 mile elevated three-lane reversible Managed Lane, b) a 15 Mile elevated, three-lane reversible EzWay, c) a BRT fixed Guideway and d) two elevated, three-lane, reversible highway bypasses around the bottlenecks at Pearl City and at Middle Street Merge. Each of these alternatives would cost less no more than $1.2 Billion and each has the traffic capacity to eliminate the H-1 bottlenecks at Pearl City and at Middle Street Merge.

Conversely, each of the steel wheel fixed guideway alternatives included in the DEIS cost no less than $6.28 Billion (Table 6-2 DEIS). Moreover, after the $6.28 Billion Rail is built and operating, traffic congestion on H-1 will worsen as shown on table 3-12 of the Alternative Analysis and on DEIS Table 3-20. The AA year 2030 shows 17,500 vehicles per hour on the H-1 freeway (rated full capacity = 9,500 vph). The DEIS yr 2030 Table 3-20 shows there will be 4,200 vph above the vehicle capacity of the highway facilities heading Koko Head bound during the morning peak period.

Conclusion: If the DEIS Rail alternatives are compared with the other transit alternatives including Managed Lanes, EzWay, BRT, or two Flyovers, each steel wheel fixed guideway alternative would be totally inferior, both in terms of cost effectiveness and for providing traffic relief.

Recommendation: Include a wide range of alternatives as required by law. The DEIS should include cost effective transit systems which will

have the capacity to eliminate H-1 congestion include Managed Lane Alternative, BRT, EzWay or two highway bypasses around the H-1 bottlenecks at Pearl City and at Middle Street merge. These alternatives can then be compared with the rail alternatives to arrive at a more logical preferred alternative.

Respectfully,

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June 11, 2010

RT10/09-336541

Mr. Ben Ramelb
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Dear Mr. Ramelb:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal dated December 29, 2008 with subject [Comment on Draft Environmental Impact Statement (DEIS) "Honolulu High-capacity transit corridor Project", Issue: DEIS should compare environmental baselines between Rail and other low-cost transit alternatives such as Managed Lanes, BRT, Ezway and No-build]:

Chapter 2 of the Final EIS summarizes the alternatives screening and selection process. Beginning in the fall of 2005, an initial screening process considered alternatives identified through previous transit studies, a field review of the study corridor, an analysis of current population and employment data for the study corridor, a literature review of technology modes, ongoing work completed as part of the Oahu Regional Transportation Plan 2030 (ORTP) prepared by the Oahu Metropolitan Planning Organization (OahuMPO) (OahuMPO 2007), and public and agency comments received during the formal Alternatives Analysis scoping process.

The screening process is documented in the Honolulu High-Capacity Transit Corridor Project Alternatives Screening Memorandum (DTS 2006a). Three scoping meetings were held during the screening process in December 2005, which included a presentation of initial alternatives to the public, interested agencies, and officials to receive comments on the Purpose

and Need, alternatives, and scope of the Alternatives Analysis. Refinements were made to the alternatives based on the public input during scoping.

After completion of screening in the winter of 2006, the following alternatives were studied in the Alternatives Analysis: No Build Alternative, Transportation System Management (TSM) Alternative, Managed Lane Alternative, and the Fixed Guideway Alternative. After review of the Alternatives Analysis Report and consideration of public comments, the City Council identified a fixed guideway transit system extending from Kapolei to UH Manoa with a connection to Waikiki as the Locally Preferred Alternative. This identification, which eliminated the TSM and Managed Lane Alternatives from further consideration, became Ordinance 07-001 on January 6, 2007. The NEPA process considered a range of alternatives that was consistent with the identified Locally Preferred Alternative. As discussed in Section 2.2, there were no alternatives that had not been previously studied and eliminated for good cause that would satisfy the Purpose and Need at less cost, with greater effectiveness, or less environmental or community impact.

The No Build Alternative is a baseline required as part of the NEPA process. All alternatives studied in both the Alternatives Analysis and EIS used the No Build Alternative as a baseline when analyzing the benefits, costs, and impacts of the projects studied.

a) The Managed Lane Alternative was fully evaluated in the Alternatives Analysis. While the Managed Lane Alternative would reduce freeway congestion (measured as vehicle hours of delay), it would increase overall system congestion by inducing additional travelers to drive, which would increase congestion on arterial and collector facilities accessing the freeways and the managed lane. In addition, once a vehicle leaves the managed lane, that vehicle is still subjected to congestion on surrounding roadways.

The analysis of the Managed Lane Alternative in Honolulu from the *Alternatives Analysis Report (DTS 2006b) shows the cost to be $2.6 billion in 2006 dollars (higher today) for a 16-mile facility. As stated in the City Council's Transit Advisory Task Force Report, a committee was charged with reviewing cost estimates for the two alternatives involving construction (the Managed Lane Alternative and Fixed Guideway Alternative). The report states that "the Task Force agrees with this committee that the Alternatives Analysis' construction cost estimates were fairly and consistently prepared, and that they may be used for both planning and cost comparisons." Information was obtained by the Task Force from the Hawaii Department of Transportation and others familiar with managed lane facilities. It is the only estimate to date that addresses Honolulu conditions.*

b) The EzWay 15-mile, three-lane viaduct concept was developed as a hybrid of a plan for elevated toll lanes and some form of rubber-tire-on-concrete transit system. It is similar to the Managed Lane Alternative that was thoroughly evaluated in the Alternatives Analysis, which also accommodated both single occupant and transit vehicles. No known cost estimate for the EzWay proposal was prepared or validated by a qualified registered professional engineer. As a point of reference, the State of Hawaii's Highway Modernization Plan dated January 22, 2009, estimates the cost of the Nimitz Viaduct at $600 million for an approximately 2.5-mile elevated highway with two

lanes, which equals $240 million per mile. Using this estimate, a 15-mile facility would cost approximately $3.6 billion.

c) As stated in Chapter 2 of the Final EIS, prior to selecting an elevated fixed guideway system, a variety of high-capacity transit options were evaluated during the Primary Corridor Transportation Project (1998-2002) and Alternatives Analysis. Options evaluated and rejected include an exclusively at-grade fixed-guideway system using bus rapid transit vehicles. In addition to comments received during the Alternatives Analysis and EIS scoping sessions, these studies provided a critical foundation for the conclusion that an elevated system would result in the best overall performance and better support of the Purpose and Need for the Project. The proposed Bus Rapid Transit Alternative, as stated in your letter, is a variation of the Transportation System Management Alternative that was evaluated in the Alternatives Analysis. While this alternative has merit for cost-effectiveness, its overall system benefit would be very low.

d) Localized bypasses would not meet system goals for corridor-wide benefits to mobility, reliability, access, and equity. The Hawaii Department of Transportation, which is responsible for the freeway system, has evaluated needs for the freeway system and identified the highway projects that would be most efficient at reducing congestion on Oahu. The projects, including a Nimitz Flyover, are listed in Table 2-3 of the Draft EIS and included in the analysis for all project alternatives. Effects of the Nimitz Flyover on traffic conditions in 2030 are discussed in Section 3.4.2 of the Final EIS. Travel on the Nimitz Flyover was included for the following travel pairs under the No Build Alternative: Kapolei to Downtown, Ewa to Downtown, and Mililani to Downtown. As shown in Figure 3-7 of the Final EIS, the Nimitz Flyover does improve transit travel times with the No Build Alternative between certain travel pairs (e.g., between Mililani and Downtown) compared to 2007 conditions. However, as also shown in this figure, travel times improve substantially more with the addition of the fixed guideway project. As a point of clarification, a Final EIS was never prepared for the Nimitz Flyover.

There could be many other versions of the type of system with minor adaptations to suit one or another special concern. In the end, the above approaches all have similar challenges as a primary solution to Honolulu's transportation problems. They do not reduce congestion, increase the reliability of the transportation system, serve future land use plans, or improve the fairness of and access to the transportation system. They also do not offer an alternative to perpetuating a reliance on limited existing travel modes. For example, localized bypasses would not meet system goals for corridor-wide benefits to mobility, reliability, access, and equity. In sum, they do not address the Purpose and Need of the Project.

Table 6-2 in the Draft EIS estimates the costs for implementing, replacing, rehabilitating, and maintaining the fixed guideway service. This table also includes the costs to restructure and expand TheBus and TheHandi-Van network. As shown in Table 6-1 of the Final EIS, the Project will cost $4.6 billion in 2009 dollars and $5.5 billion in inflated dollars, including finance charges.

While the Managed Lane Alternative identified in the Alternatives Analysis would reduce freeway congestion (measured as vehicle hours of delay), it would increase overall system congestion by inducing additional travelers to drive. These additional

travelers, in turn, would increase congestion on arterial and collector facilities accessing the freeways. System-wide congestion will be greater in 2030 than today. While spot-congestion in some locations could decrease with the Managed Lane Alternative, the Reversible Option of the Managed Lane Alternative would increase system-wide congestion compared to the No Build Alternative. Meanwhile, the Fixed Guideway Transit Alternative will decrease congestion compared to the No Build Alternative.

The Managed Lane Alternative was fully evaluated in the Alternatives Analysis. As shown in the Alternatives Analysis Report (DTS 2006b), the Managed Lane Alternative would not eliminate congestion and bottlenecks on the H-1 Freeway. Table 3-12 in the Alternative Analysis Report shows that, under the No Build Alternative, there would be 18,049 vehicles per hour (vph) operating on the H-1 Freeway in 2030. Vehicle volumes rise to 18,327 vph (Two-direction Option) or 18,419 vph (Reversible Option) with the Managed Lane Alternative, while traffic volumes decrease to 17,209 vph with the 20-mile Fixed Guideway Transit Alternative. Accordingly, the Fixed Guideway Transit Alternative will reduce traffic volumes from those projected under the 2030 No Build Alternative.

Table 3-20 in the Draft EIS shows 20,800 vehicles per hour (vph) at the Kalauao screenline (virtual lines across the corridor used to measure total travel at that point) in the Koko Head-bound direction during the a.m. peak hour with the No Build Alternative. This number decreases 9 percent with the addition of the Salt Lake Alternative to 18,910 vph. Numbers have been updated for the Final EIS based on the Airport Alternative and refinements to the travel demand forecasting model to account for non-home-based direct-demand trips (trips that do not originate or end at home) during off-peak periods. In addition, the air passenger model (which forecasts travel in the corridor related to passengers arriving or departing at Honolulu International Airport) was updated to reflect current conditions. These revisions were made based on consultation with FTA. The updated results continue to show that traffic will decrease with the addition of the Project. Tables 3-9 and 3-10 in the Final EIS shows an 11 percent decrease in vph at this screenline during the a.m. peak hour in the Koko Head-bound direction and a 10 percent reduction during the p.m. peak hour in the Ewa-bound direction. This demonstrates that the fixed guideway system will decrease traffic congestion at this location.

As stated in Section 7.4 of the Final EIS, cost-effectiveness is one of the key criteria that FTA uses to evaluate projects proposed for Section 5309 New Starts funding. The cost-effectiveness indices for the Project compared to the baseline is within the "medium" range established by FTA for its New Starts ratings which, along with other considerations, is currently required to qualify for New Starts funding (see Table 7-8 of the Final EIS). As shown in Table 6-1 of the Final EIS, the Project will cost $4.6 billion in 2009 dollars and $5.5 billion in inflated dollars, including finance charges.

The scoping process in March 2007 requested that the public propose alternatives that would satisfy the Purpose and Need at less cost or with greater effectiveness or less environmental or community impact and were not previously studied and eliminated for good cause. During the scoping process, several comments were received requesting reconsideration of the Managed Lane Alternative. This was considered and rejected during the Alternatives Analysis process. Because no new

information was provided that would have substantially changed the findings of the Alternatives Analysis process regarding the Managed Lane Alternative, this alternative is not included in the Draft or Final EISs. The only alternative proposed that met this criteria was a Fixed Guideway Transit Alternative following an alternative alignment. All reasonable alternatives that have been identified and that satisfy the Purpose and Need at less cost or with greater effectiveness or less environmental or community impact and were not previously studied and eliminated for good cause have been evaluated in the Draft EIS.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
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Submission Date :	12/29/2008

Submission Content/Notes : 29 December, 2008

To:
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Director Department of Transportation Services
City and County of Honolulu
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FAX: (808) 587-6080

Subject: Comment on Draft Environmental Impact Statement (DEIS) "Honolulu High-capacity transit corridor Project", Issue : DEIS traffic analysis provides incomplete information resulting in arriving at wrong DEIS findings

Fact:
DEIS Table 3-20 provides existing traffic volumes but does not provide forecasted volumes with resultant Level of Service (LOS) for each specific highway.

Discussion:
DEIS Table 3-20 lists a general "facility" highway serving each transportation corridor. This does not provide sufficient information to determine which specific highway will continue to have congestion after the transit alternative is completed and operating. Each "facility" should be broken down further, i.e. "Kalauao Koko Head bound " should include H-1 Fwy, H-1 Fwy (HOV), H-1 Fwy (Zipper), Moanalua, Kamehameha Hwy with appropriate traffic volumes, present and forecast, and Level of Service for each transit alternative.

The 2006 Alternative Analysis and DEIS show that congestion on H-1 at Kalauao Kohohead bound and at Kapalama Canal will continue to be at Level of Service "F" after the steel where fixed alternative is built and operating. Despite this continued congestion, the Alternative Analysis, and the DEIS accepts, that the steel wheel fixed guideway is the recommended alternative. This conclusion is totally in error because both the AA and DEIS do not sufficiently provide traffic volumes, level of service and specific highways to arrive at a reasonable conclusion. The fact that rail will worsen congestion alone is enough to disqualify rail as the preferred transit alternative.

The City Alternative Analysis, Table 3-12, shows that there will still be 17,500 vehicles per hour in 2030 on the H-1 (full rated capacity = 9,500 vehicles per hour) at Pearl City AFTER the $7.0 Billion Rail is built and operating.

The DEIS Screenline Volumes for the 2030 Salt Lake Build Alternative Table 3-20, shows that with the Salt Lake Build Alternative AT Screen line "D" :
- Kalauao Koko Head bound : Observed (forecast) Volume - AM Peak = 18,910 vehicles per hour (vph).
- Facility 2030 Capacity - AM Peak = 14, 650 vph - Reference: Table 3-

12 Alternative Analysis.

Result: There will be 4,260 vph above the facility capacity (H-1 + HOV + Zipper + Kam+ Moanalua) at Kalauao which indicates a Level of Service (LOS) F AFTER the Salt Lake Rail is built. This conclusion is consistent with the conclusion using the numbers from the City's Alternative analysis report. With rail, the above numbers show congestion will WORSEN after the $7.0 Billion full build-out Rail is completed.

Conclusion: The DEIS traffic analysis provides incomplete information resulting in arriving at wrong conclusions. Specifically, the detailed Alternative Analysis Table 3-12 and DEIS Table 3-20 show that a rail alternative "worsens" traffic congestion on most highways which rejects the findings that Rail will "improve mobility, reliability, equity and reduced travel times.

Recommendation: 1) Revise DEIS Table 3-20 and other appropriate tables and narrative to include the three-lane reversible MLA, the three-lane EzWay, BRT and two separate Flyovers over Kamehameha Highway and Nimitz Highway and 2) Provide a higher level of detailed analysis which will be similar or better than that provided in the Alternative Analysis Table 3-12.

Respectfully,

Ben Rameib P.E.
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96818

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DEPUTY DIRECTOR

June 11, 2010

RT10/09-336545

Mr. Ben Ramelb
1148 Ala Lilikoi Street
Honolulu, Hawaii 96818

Dear Mr. Ramelb:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal dated December 29, 2008 with subject [Comment on Draft Environmental Impact Statement (DEIS) "Honolulu High-capacity transit corridor Project", Issue: DEIS traffic analysis provides incomplete information resulting in arriving at wrong DEIS findings]:

Based on your comment, detailed traffic information for each roadway at screenlines (virtual lines across the corridor used to measure total travel at that point), including volumes, maximum thresholds, number of lanes, and level-of-service, is provided in Tables 3-9 and 3-10 in the Final EIS. This table provides information for 2005 and the 2030 No Build Alternative and the Project.

In responding to your conclusion, neither Table 3-12 in the Alternative Analysis report nor Table 3-20 in the Draft EIS show that rail would worsen traffic. Table 3-12 shows that roadway conditions will be worse in 2030 compared to existing conditions. However, traffic conditions will be better with the fixed guideway compared to conditions without the fixed guideway. Table 3-20 in the Draft EIS shows 20,800 vehicles per hour (vph) at the Kalauao screenline

in the Koko Head-bound direction during the a.m. peak hour with the No Build Alternative. This number decreases 9 percent with the addition of the Salt Lake Alternative to 18,910 vph. Numbers have been updated for the Final EIS based on the Airport Alternative and refinements to the travel demand forecasting model to account for non-home-based direct-demand trips (trips that do not originate or end at home) during off-peak periods. In addition, the air passenger model (which forecasts travel in the corridor related to passengers arriving or departing at Honolulu International Airport) was updated to reflect current conditions. These revisions were made based on consultation with FTA. The updated results continue to show that traffic will decrease with the addition of the Project. Tables 3-9 and 3-10 in the Final EIS shows an 11 percent decrease in vph at this screenline during the a.m. peak hour in the Koko Head-bound direction and a 10 percent reduction during the p.m. peak hour in the Ewa-bound direction. This demonstrates that the fixed guideway system will decrease traffic congestion at this location. Accordingly, as compared to the No Build Alternative, the fixed guideway system will improve mobility, reliability, and equity, as well as reduce travel times.

As shown in Table 6-1 of the Final EIS, the Project will cost $4.6 billion in 2009 dollars and $5.5 billion in inflated dollars, including finance charges.

In addition, to address your recommendation, non-rail alternatives were evaluated in the Alternative Analysis. Chapter 2 of the Final EIS summarizes the alternatives screening and selection process. Beginning in the fall of 2005, an initial screening process considered alternatives identified through previous transit studies, a field review of the study corridor, an analysis of current population and employment data for the study corridor, a literature review of technology modes, ongoing work completed as part of the Oahu Regional Transportation Plan 2030 (ORTP) prepared by the Oahu Metropolitan Planning Organization (OahuMPO) (OahuMPO 2007), and public and agency comments received during the formal Alternatives Analysis scoping process.

The screening process is documented in the Honolulu High-Capacity Transit Corridor Project Alternatives Screening Memorandum (DTS 2006a). Three scoping meetings were held during the screening process in December 2005, which included a presentation of initial alternatives to the public, interested agencies, and officials to receive comments on the Purpose and Need, alternatives, and scope of the Alternatives Analysis. Refinements were made to the alternatives based on the public input during scoping.

After completion of screening in the winter of 2006, the following alternatives were studied in the Alternatives Analysis: No Build Alternative, Transportation System Management (TSM) Alternative, Managed Lane Alternative, and the Fixed Guideway Alternative. After review of the Alternatives Analysis Report and consideration of public comments, the City Council identified a fixed guideway transit system extending from Kapolei to UH Manoa with a connection to Waikiki as the Locally Preferred Alternative. This identification, which eliminated the TSM and Managed Lane Alternatives from further consideration, became Ordinance 07-001 on January 6, 2007. The NEPA process considered a range of alternatives that was consistent with the identified Locally Preferred Alternative. As discussed in Section 2.2, there were no alternatives that had not been previously studied and eliminated for good cause that would satisfy the Purpose and Need at less cost, with greater effectiveness, or less environmental or community impact.

Accordingly, the three-lane Reversible Option of the Managed Lane Alternative, the three-lane EzWay, Bus Rapid Transit, and separate flyovers for Kamehameha Highway and Nimitz Highway were not included in the Draft or Final EISs.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
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Submission Date :	12/29/2008

Submission Content/Notes : 29 December, 2008

To:
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Subject: Comment on Draft Environmental Impact Statement (DEIS) "Honolulu High-capacity transit corridor Project", Issue: DEIS Summary of findings on Transportation Conditions and Effects is incorrect

Fact:
DEIS Summary of findings on Transportation Conditions and Effects, page 3-53, are not consistent with Table 3-20 which indicate that with rail built and operating, traffic congestion on H-1 and other highways will WORSEN.

Discussion:
The summary on existing conditions states, inter alia, that:
- "increasing traffic congestion and constrained transit operating conditions have reduced system reliability and mobility for all travelers."
- Reliability of transit has worsened....Reliability is at level of service "F".
The summary on Effects of the "Build Alternatives" state that transit service mobility, reliability, equity and access to new development would improve (if rail is built)." This summary is totally false because the 2006 Alternative Analysis Table 3-12 and DEIS Table 3-20 show that Rail Transit, if built, will result in WORSE traffic congestion on H-1 and other highways to level of service "F" in year 2030.

The City Alternative Analysis, Table 3-12, shows that there will still be 17,500 vehicles per hour in 2030 on the H-1 (full rated capacity = 9,500 vehicles per hour) at Pearl City AFTER the $6.0 Billion Rail is built and operating.

Result: There will be an 8,000 vph overload on H-1 after Rail is built which will worsen traffic congestion on H-1 resulting in a level of service "F".

The DEIS Screenline Volumes for the 2030 Salt Lake Build Alternative Table 3-20, shows that with the Salt Lake Build Alternative AT Screen line "D" :
- Kalauao Koko Head bound : Observed (forecast) Volume - AM Peak = 18,910 vehicles per hour (vph).
- Facility 2030 Capacity - AM Peak = 14, 650 vph - Reference: Table 3-12 Alternative Analysis.
Result: There will be 4,260 vph above the facility capacity (H-1 + HOV + Zipper + Kam+ Moanalua) at Kalauao which indicates a Level of Service (LOS) F AFTER the Salt Lake Rail is built. This conclusion is consistent with the conclusion using the numbers from the City's Alternative

analysis report. With rail, the above numbers show congestion will WORSEN after the $6.0 Billion full build-out Rail is completed.

The above discussion refutes the DEIS statement that the "Effects of the Build alternatives" will: Improve service mobility, reliabily, equity, and access to new development; improve travel times, and improve operating efficiency because after the $6.0 Billion Rail is built, congestion on H-1 and other highways will WORSEN.

Conclusion: The DEIS Table 3-20 and AA Table 3-12 show that traffic on H-1 and other highways will result in worse traffic congestion in year 2030 AFTER Rail is built and therefore rejects the summary finding that Rail will "improve mobility, reliability, equity and reduced travel times.

Recommendation: It is recommended that :
1) Revise the summary of findings on Transportation Conditions and Effects to be consistent with the finding that Rail will NOT improve mobility, reliability, equity and access to new development,
2) Revise DEIS Table 3-20 and other appropriate tables and narrative to: indicate that Traffic on H-1 will worsen and provide a higher level of detailed analysis which will be similar to that provided in the Alternative Analysis Table 3-12,
3) state that traffic with rail will have a net result of worse traffic congestion on H-1 at the H-1/H-2 merge and at the Middle Street merge and
4) include in the DEIS other cost-effective transit alternatives such as an 11-mile three-lane reversible MLA for evaluation and comparison with the No Build alternative and the rail alternatives.

Respectfully,

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June 11, 2010

RT10/09-336548

Mr. Ben Ramelb
1148 Ala Lilikoi Street
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Dear Mr. Ramelb:

Subject: Honolulu High-Capacity Transit Corridor Project
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Regarding the comment in your letter under the heading "Fact," the Alternatives Analysis, Draft EIS, and Final EIS all show that conditions on the highways will worsen by 2030 compared to existing conditions whether the fixed guideway, managed lane, or more buses are implemented. The comparison that is key to the Project is that rail will improve conditions compared to what they would be if the rail project were not built, even after all of the proposed highway improvements listed in the Oahu Regional Transportation Plan are completed. Tables 3-9 and 3-10 in the Final EIS show a reduction in traffic congestion at each screenline (virtual lines across the corridor used to measure total travel at that point) with the Project compared to No Build conditions. The "Summary of Transportation Conditions and Effects" has been moved from the back of Chapter 3 to Table 3-1 in the Final EIS. This table has been revised to state that traffic congestion will improve with the Project.

Regarding your comments under the heading "Discussion," as shown in the Alternatives Analysis Report (DTS 2006b), the Managed Lane Alternative would not eliminate congestion and bottlenecks on the H-1 Freeway. Table 3-12 in the Alternative Analysis Report shows that, under the No Build Alternative, there would be 18,049 vehicles per hour (vph) operating on the H-1 Freeway in 2030. Vehicle volumes rise to 18,327 vph (Two-direction Option) or 18,419 vph (Reversible Option) with the Managed Lane Alternative, while traffic volumes decrease to 17,209 vph with the 20-mile Fixed Guideway Transit Alternative. Accordingly, the Fixed Guideway Transit Alternative will reduce traffic volumes from those projected under the 2030 No Build Alternative.

Table 3-20 in the Draft EIS shows 20,800 vehicles per hour (vph) at the Kalauao screenline (virtual lines across the corridor used to measure total travel at that point) in the Koko Head-bound direction during the a.m. peak hour with the No Build Alternative. This number decreases 9 percent with the addition of the Salt Lake Alternative to 18,910 vph. Numbers have been updated for the Final EIS based on the Airport Alternative and refinements to the travel demand forecasting model to account for non-home-based direct-demand trips during off-peak periods. In addition, the air passenger model was updated to reflect current conditions. These revisions were made based on FTA direction. The updated results continue to show that traffic will decrease with the addition of the Project. Tables 3-9 and 3-10 in the Final EIS shows an 11 percent decrease in vph at this screenline during the a.m. peak hour in the Koko Head-bound direction and a 10 percent reduction during the p.m. peak hour in the Ewa-bound direction. This demonstrates that the fixed guideway system will decrease traffic congestion at this location.

As shown in Table 6-1 of the Final EIS, the Project will cost $4.6 billion in 2009 dollars and $5.5 billion in inflated dollars, including finance charges. Chapters 3 and 7 of the Final EIS discuss how the Project will address the four goals listed in Chapter 1. In addition, Chapter 3 discusses the improvements in travel time and operating efficiency that will occur as a result of the Project. The Project will completely separate fixed guideway vehicles from roadway traffic operations and, accordingly, it will provide substantially higher transit-service reliability compared to the No Build Alternative. This reliability will not deteriorate over time, even with projected population and employment growth in the study corridor. The reliability of fixed guideway vehicles will be better than the reliability of transit vehicles operating on increasingly congested highways.

In response to your conclusion, as stated previously, the Project will improve congestion, mobility, reliability, equity, and travel times.

The following points address comments under the heading "Discussion" in your letter:

1) The finding that the Project "will improve mobility, reliability, equity, and access to new development" relates to its ability to improve conditions compared to what they would be without the rail system. It is a fair assessment of the Project's contribution to the four needs/objectives defined in Chapter 1. As a result, the "Summary of Findings on Transportation Conditions and Effects" has not been revised in the Final EIS.

2) Detailed traffic information for each roadway at screenlines, including volumes, maximum thresholds, number of lanes, and level-of-service, is provided in Tables 3-9 and 3-10 in the Final EIS. As shown, congestion on the H-1 Freeway improves with the Project.

3) There is no basis to conclude that the Project will worsen highway congestion. Conditions at the H-1/H-2 interchange, on the H-1 Freeway, and at the Middle Street merge with rail will be better with the Project than without it.

4) The Managed Lane Alternative was studied in the Alternatives Analysis and resulted in worse conditions than other choices, including the fixed guideway (rail). It was only slightly better than the No Build Alternative, so it has little merit as a sole solution in place of the rail project.

There could be many other versions of the type of system with minor adaptations to suit one or another special concern. In the end, the above approaches all have similar challenges as a primary solution to Honolulu's transportation problems. They do not reduce congestion, increase the reliability of the transportation system, serve future land use plans, or improve the fairness of and access to the transportation system. They also do not offer an alternative to perpetuating a reliance on limited existing travel modes. For example, localized bypasses would not meet system goals for corridor-wide benefits to mobility, reliability, access, and equity. In sum, they do not address the Purpose and Need of the Project.

Chapter 2 of the Final EIS summarizes the alternatives screening and selection process. Beginning in the fall of 2005, an initial screening process considered alternatives identified through previous transit studies, a field review of the study corridor, an analysis of current population and employment data for the study corridor, a literature review of technology modes, ongoing work completed as part of the Oahu Regional Transportation Plan 2030 (ORTP) prepared by the Oahu Metropolitan Planning Organization (OahuMPO) (OahuMPO 2007), and public and agency comments received during the formal Alternatives Analysis scoping process.

The screening process is documented in the Honolulu High-Capacity Transit Corridor Project Alternatives Screening Memorandum (DTS 2006a). Three scoping meetings were held during the screening process in December 2005, which included a presentation of initial alternatives to the public, interested agencies, and officials to receive comments on the Purpose and Need, alternatives, and scope of the Alternatives Analysis. Refinements were made to the alternatives based on the public input during scoping.

After completion of screening in the winter of 2006, the following alternatives were studied in the Alternatives Analysis: No Build Alternative, Transportation System Management (TSM) Alternative, Managed Lane Alternative, and the Fixed Guideway Alternative. After review of the Alternatives Analysis Report and consideration of public comments, the City Council identified a fixed guideway transit system extending from Kapolei to UH Manoa with a connection to Waikiki as the Locally Preferred Alternative. This identification, which eliminated the TSM and Managed Lane Alternatives from further consideration, became Ordinance 07-001 on January 6, 2007. The NEPA process considered a range of alternatives that was consistent with the identified Locally Preferred Alternative. As discussed in Section 2.2, there were no alternatives that had not been previously studied and eliminated for good cause that would satisfy the Purpose and Need at less cost, with greater effectiveness, or less environmental or community impact.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this

letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
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Submission Date :	12/29/2008

Submission Content/Notes : 29 December, 2008

To:
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Honolulu
HI 96813
FAX: (808) 587-6080

Subject: Comment on Draft Environmental Impact Statement (DEIS) "Honolulu High-capacity transit corridor Project", Issue: DEIS traffic analysis provides incomplete information

Fact:
DEIS Table 3-12 shows existing and 2030 traffic volumes for No Build Alternative

DEIS Table 3-20 provides forecasted traffic volumes but do not show resultant Level of Service (LOS) for each highway (facility) Corridor.

Discussion:
DEIS Table 1-3 and Table 3-20 are incomplete because a) lane designations are too generalized, b) each highway lacks level of service information, and c) lacks sufficient non-rail alternatives, i.e. Managed Lane, BRT, EzWay.

Specific Highway and lane designations should be specific. "Facility" highways serving each transportation corridor should be broken down further, i.e. "Kalauao Koko Head bound " should be broken down into H-1 Fwy, H-1 Hwy (HOV), H-1 Fwy (Zipper), Moanalua, Kamehameha Hwy with appropriate traffic volumes, present and forecast, and Level of Service for each transit alternative.

The 2006 Alternative Analysis and DEIS concludes that Rail transit will "help reduce congestion" which is very misleading because while rail will HELP in reducing future congestion, the NET future traffic congestion on H-1 will substantially INCREASE, primarily because rail will not have the commuter capacity to transport the net future commuter demand in year 2030. For example, the City Alternative Analysis, Table 3-12, shows that there will still be 17,500 vehicles per hour in 2030 on the H-1 (full rated capacity = 9,500 vehicles per hour) at Pearl City AFTER the $6.0 Billion Rail is built and operating.

The DEIS Screenline Volumes for the 2030 Salt Lake Build Alternative Table 3-20, shows that with the Salt Lake Build Alternative AT Screen line "D" :
- Kalauao Koko Head bound : Observed (forecast) Volume - AM Peak = 18,910 vehicles per hour (vph).
- Facility 2030 Capacity - AM Peak = 14, 650 vph - Reference: Table 3-12 Alternative Analysis.

Result: Results from DEIS Table 3-20 show that there will be 4,260 vph above the facility capacity (H-1 + HOV + Zipper + Kam+ Moanalua) at Kalauao which indicates a Level of Servica (LOS) F AFTER the Salt Lake Rail is built. This conclusion is consistent with the conclusion using the numbers from the City's Alternative analysis report. With rail, the above numbers show congestion will WORSEN after the $6.0 Billion full build-out Rail is completed. Therefore, the DEIS Table 3-20 showing a positive change in congestion is MISLEADING because the NET change in traffic congestion will WORSEN.

For example, the forecasted volume for Kalauao Koko Head bound A.M. Peak Hour is 18,910 vph while the rated full capacity of the "facility" is 14,650 vph (reference: AA table 3-12 for facility including H-1 Fwy, H-1 Hwy (HOV), H-1 Fwy (Zipper), Moanalua, Kamehameha Hwy . There will be 4,260 vehicles per hour above the facility rated capacity resulting in a LOS "F". This would contradict the findings on DEIS page 3-53 where mobility, reliability and equity would DECREASE rather than increase.

This makes it all the more reason to include a an 11- mile, elevated, three lane reversible Managed Lane Alternative, a transit system which is lower in cost than rail and will have the capacity to eliminate the LOF "F" on the H-1 freeway.

Conclusion: The DEIS traffic analysis provides incomplete information resulting in arriving at wrong conclusions. Specifically, the detailed Alternative Analysis Table 3-12 and DEIS Table 3-20 show "net result" that a rail alternative "worsens" traffic congestion on most highways which rejects the findings that Rail will "improve mobility, reliability, equity and reduced travel times.

Recommendation: It is recommended that 1) the DEIS Table 3-20 and other appropriate tables and narrative be revised to indicate that Traffic on H-1 will worsen , provide a higher level of detailed analysis which will be similar to that provided in the Alternative Analysis Table 3-12, 2) state that traffic with rail will have a net result of worse traffic congestion on H-1 at the H-1/H-2 merge and at the Middle Street merge and 3) that other low cost-effective transit alternatives be included in the DEIS for evaluation and comparison with the No Build alternative and the rail alternatives.

Respectfully,

Ben Ramelb P.E.
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Honolulu, HI
96818

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

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DEPUTY DIRECTOR

June 11, 2010

RT10/09-336583

Mr. Ben Ramelb
1148 Ala Lilikoi Street
Honolulu, Hawaii 96818

Dear Mr. Ramelb:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal dated December 29, 2008 with subject [Comment on Draft Environmental Impact Statement (DEIS) "Honolulu High-capacity transit corridor Project", Issue: DEIS traffic analysis provides incomplete information]:

In response to your recommendation, level-of-service, maximum volume thresholds, and number of lanes on individual roadway facilities has been added to Tables 3-9 and 3-10 in the Final EIS. This table shows that traffic on the H-1 Freeway will improve with the Project compared to 2030 No Build conditions.

Traffic volumes in 2030 under any alternative will be higher than those observed under current conditions. As shown in the Alternatives Analysis Report (DTS 2006b), the Managed Lane Alternative would not eliminate congestion and bottlenecks on the H-1 Freeway. Table 3-12 in the Alternative Analysis Report shows that, under the No Build Alternative, there would be 18,049 vehicles per hour (vph) operating on the H-1 Freeway in 2030. Vehicle volumes rise to 18,327 vph (Two-direction Option) or 18,419 vph (Reversible Option) with the Managed Lane Alternative, while traffic volumes decrease to 17,209 vph with the 20-mile Fixed

Guideway Transit Alternative. Accordingly, the Fixed Guideway Transit Alternative will reduce traffic volumes from those projected under the 2030 No Build Alternative.

Table 3-20 in the Draft EIS shows 20,800 vehicles per hour (vph) at the Kalauao screenline (virtual lines across the corridor used to measure total travel at that point) in the Koko Head-bound direction during the a.m. peak hour with the No Build Alternative. This number decreases 9 percent with the addition of the Salt Lake Alternative to 18,910 vph. Numbers have been updated for the Final EIS based on the Airport Alternative and refinements to the travel demand forecasting model to account for non-home-based direct-demand trips during off-peak periods. In addition, the air passenger model was updated to reflect current conditions. These revisions were made based on FTA direction. The updated results continue to show that traffic will decrease with the addition of the Project. Tables 3-9 and 3-10 in the Final EIS shows an 11 percent decrease in vph at this screenline during the a.m. peak hour in the Koko Head-bound direction and a 10 percent reduction during the p.m. peak hour in the Ewa-bound direction. This demonstrates that the fixed guideway system will decrease traffic congestion at this location.

As stated in Chapter 3 of the Final EIS, the travel demand forecasting model predicts a maximum peak direction volume of 14,700 passengers during the a.m. two-hour peak period. As a result of updated ridership forecasts, the operating plan for the fixed guideway system has been revised and the system will have a minimum capacity of approximately 17,300 passengers per direction during the two-hour peak period. The fixed guideway system is planned to operate with two- or three-car trains with a capacity of between 325 and 500 passengers each. At three-minute headways during the peak period, that provides capacity for approximately 8,650 passengers per peak direction per peak hour. This capacity figure applies in both directions for a total system capacity of approximately 17,300 passengers per peak hour.

In addition, a major benefit of the fixed guideway is that once built, it is flexible enough to accommodate significant growth. For example, the full capacity of the fixed guideway with four-car trains and 90-second headways is over 25,000 passengers per hour per direction or over 50,000 in total. Accordingly, the fixed guideway system will provide sufficient capacity based on travel demand forecasting results.

As shown in Table 6-1 of the Final EIS, the Project will cost $4.6 billion in 2009 dollars and $5.5 billion in inflated dollars, including finance charges. Chapters 3 and 7 of the Final EIS discuss how the Project will address the four goals listed in Chapter 1. In addition, Chapter 3 discusses the improvements in travel time and operating efficiency that will occur as a result of the Project. The Project will completely separate fixed guideway vehicles from roadway traffic operations and, accordingly, it will provide substantially higher transit-service reliability compared to the No Build Alternative. This reliability will not deteriorate over time, even with projected population and employment growth in the study corridor. The reliability of fixed guideway vehicles will be better than the reliability of transit vehicles operating on increasingly congested highways.

The Managed Lane Alternative was fully evaluated in the Alternatives Analysis. As stated previously, the Managed Lane Alternative did not improve congestion on the H-1 Freeway. There could be many other versions of the type of system with minor adaptations to suit one or another special concern. In the end, the above approaches all have similar challenges as a primary solution to Honolulu's transportation problems. They do not reduce congestion, increase the reliability of the transportation system, serve future land use plans, or

improve the fairness of and access to the transportation system. They also do not offer an alternative to perpetuating a reliance on limited existing travel modes. For example, localized bypasses would not meet system goals for corridor-wide benefits to mobility, reliability, access, and equity. In sum, they do not address the Purpose and Need of the Project.

Chapter 2 of the Final EIS summarizes the alternatives screening and selection process. Beginning in the fall of 2005, an initial screening process considered alternatives identified through previous transit studies, a field review of the study corridor, an analysis of current population and employment data for the study corridor, a literature review of technology modes, ongoing work completed as part of the Oahu Regional Transportation Plan 2030 (ORTP) prepared by the Oahu Metropolitan Planning Organization (OahuMPO) (OahuMPO 2007), and public and agency comments received during the formal Alternatives Analysis scoping process.

The screening process is documented in the Honolulu High-Capacity Transit Corridor Project Alternatives Screening Memorandum (DTS 2006a). Three scoping meetings were held during the screening process in December 2005, which included a presentation of initial alternatives to the public, interested agencies, and officials to receive comments on the Purpose and Need, alternatives, and scope of the Alternatives Analysis. Refinements were made to the alternatives based on the public input during scoping.

After completion of screening in the winter of 2006, the following alternatives were studied in the Alternatives Analysis: No Build Alternative, Transportation System Management (TSM) Alternative, Managed Lane Alternative, and the Fixed Guideway Alternative. After review of the Alternatives Analysis Report and consideration of public comments, the City Council identified a fixed guideway transit system extending from Kapolei to UH Manoa with a connection to Waikiki as the Locally Preferred Alternative. This identification, which eliminated the TSM and Managed Lane Alternatives from further consideration, became Ordinance 07-001 on January 6, 2007. The NEPA process considered a range of alternatives that was consistent with the identified Locally Preferred Alternative. As discussed in Section 2.2, there were no alternatives that had not been previously studied and eliminated for good cause that would satisfy the Purpose and Need at less cost, with greater effectiveness, or less environmental or community impact.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
Creation Date :	12/29/2008
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Submission Date :	12/29/2008

Submission Content/Notes : 29 December, 2008

To:
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Director Department of Transportation Services
City and County of Honolulu
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FAX: (808) 587-6080

Subject: Comment on Draft Environmental Impact Statement (DEIS) "Honolulu High-capacity transit corridor Project",
Issue: DEIS traffic analysis on Air Quality is incomplete

Fact:
DEIS paragraph 4.8.1 methodology states "Air Quality effects predicted to result from the Project's operation are based on the anticipated vehicle miles traveled (VMT) and average network speed for each alternative."

Discussion:
1) City AA, Table 3-12 shows year 2030 forecast volume of 17,500 vph on H-1(full rated capacity = 9,500 vph) after the Rail is built and operating. Therefore, there is a commuter overload on H-1 Freeway of 8,000 vph.
Result: There will be an 8,000 vph overload on H-1 after Rail is built which will worsen traffic congestion on H-1 resulting in a level of service "F". These 8,000 vehicles will cause major pollution because the Train cannot carry the full commuter demand for yr 2030. = 9,600 commuters per hour.

2) The DEIS Screenline Volumes for the 2030 Salt Lake Build Alternative Table 3-20, shows that with the Salt Lake Build Alternative AT Screen line "D" :
- Kalauao Koko Head bound: Observed (forecast) Volume - AM Peak = 18,910 vehicles per hour (vph).
- Facility 2030 Capacity - AM Peak = 14, 650 vph - Reference: Table 3-12 Alternative Analysis.
Result: There will be 4,260 vph above the facility capacity (H-1 + HOV + Zipper + Kam Hwy + Moanalua) at Kalauao which indicates a Level of Service (LOS) F AFTER the Salt Lake Rail is built. These 4,260 vehicles will cause major pollution because the Train cannot carry the full commuter demand for yr 2030.

Both AA Table 3-12 and DEIS Table 3-20 show that traffic congestion on H-1 will WORSEN after the $6.0 Billion Rail is built and operating.

DEIS Table 4-12 , 2030 Regional Pollutant Burdens, do not include the pollutants discharged by 8,000 vehicles per hour (equivalent 9,600 commuters per hour) per the AA or 4,260 vph per the DEIS which will

be gridlocked on H-1 Freeway because the low-capacity train cannot accommodate the 2030 commuter demand.

A three lane Menaged Lane reversible will substantially eliminate traffic overload on H-1 during peak travel periods thus:

- Numbers from Table 3-12 of city 2006 Nov Alternative Analysis ($10 million report):
- Rail only: capacity = 6000 commuters per peak hour (equivalent 5000 vehicles per peak hour.)
- H-1 only: rated capacity = 9,500 vehicles per hour (equivalent 15,400 commuters per hour
- H-1 forecast yr 2030 traffic load = 17,500 vehicles per hour per City AA Table 3-12 (or 8,000 vph overload = 9,600 commuters per hour)

Managed Lane three-Lane HOV Reversible Flyover: capacity = 6,000 high occupancy vehicles per hour (equivalent 21,600 commuters per hour). Capacity based on HOV use on Flyover by 200 express buses per peak hour , car pools, van pools, green cars and HOV2. (50 pns per express bus and 5800 vph at avge 2 pns per vehicle).

Year 2030 commuter load by City AA Report = Rail (6000) + H-1 overload (9,600) + H-1 capacity (15,400) = 31,000 commuters.

2030 Load = 31,000 commuters per hour
Rail + H-1 = 21,400 commuters per hour
Managed Lane HOV + H-1 = 37,000 commuters per hour

Finding: Rail does not have sufficient commuter capacity which will cause 9,600 commuters to be stuck in gridlock on H-1 or stuck at rail stations (especially at stations between Waipahu and Kalihi). Managed Lane HOV Alternative will eliminate congestion and bottlenecks on H-1.

Conclusion:
DEIS Pollutant conclusions on Table 4-12 for the Airport and Salt Lake alternatives are incorrect because they do not include pollutants discharged by the additional 8,000 (4,260) vehicles per hour gridlocked on H-1 according to Table 3-12 of the AA and Table 3-20 of the DEIS.

Recommendation: Revise the DEIS findings regarding Pollutant Burdens based on inclusion of the 8,000vph (or 4,260 vph) "overload on H-1" during peak periods.

Respectfully,

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June 11, 2010

RT10/09-336585

Mr. Ben Ramelb
1148 Ala Lilikoi Street
Honolulu, Hawaii 96818

Dear Mr. Ramelb:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address your comments received from agencies and the public on the Draft EIS. The following paragraphs address comments regarding the above-referenced submittal dated December 29, 2008 with subject [Comment on Draft Environmental Impact Statement (DEIS) "Honolulu High-capacity transit corridor Project", Issue: DEIS traffic analysis on Air Quality is incomplete]:

Traffic volumes in 2030 under any alternative will be higher than those observed under current conditions. As shown in the Alternatives Analysis Report (DTS 2006b), the Managed Lane Alternative would not eliminate congestion and bottlenecks on the H-1 Freeway. Table 3-12 in the Alternative Analysis Report shows that, under the No Build Alternative, there would be 18,049 vehicles per hour (vph) operating on the H-1 Freeway in 2030. Vehicle volumes rise to 18,327 vph (Two-direction Option) or 18,419 vph (Reversible Option) with the Managed Lane Alternative, while traffic volumes decrease to 17,209 vph with the 20-mile Fixed Guideway Transit Alternative. Accordingly, the Fixed Guideway Transit Alternative will reduce traffic volumes from those projected under the 2030 No Build Alternative.

You are correct that there will be 18,910 vph at the Kalauao screenline in the Koko Head-direction under 2030 Build conditions; however, Table 3-20 also shows that there will be

20,800 vph at that screenline in the Koko Head direction under the 2030 No Build conditions. Accordingly, the table shows a 9 percent reduction in vph at this screenline as a result of the fixed guideway system. In addition, there will be a 12 percent reduction in traffic at this screenline during the p.m. peak hour in the Ewa direction. Numbers have been updated for the Final EIS based on the Airport Alternative and refinements to the travel demand forecasting model to account for non-home-based direct-demand trips (trips that do not originate or end at home) during off-peak periods. In addition, the air passenger model (which forecasts travel in the corridor related to passengers arriving or departing at Honolulu International Airport) was updated to reflect current conditions. These revisions were made based on consultation with FTA. The updated results continue to show that traffic will decrease with the addition of the Project. Tables 3-9 and 3-10 in the Final EIS shows an 11 percent decrease in vph at this screenline during the a.m. peak hour in the Koko Head-bound direction and a 10 percent reduction during the p.m. peak hour in the Ewa-bound direction. This demonstrates that the fixed guideway system will decrease traffic congestion at this location.

According to Chapter 4 of the Final EIS, it is anticipated that the Project will reduce regional pollutant emissions by between 3 to 5 percent, compared to the No Build Alternative. Table 4-15 in the Final EIS shows the results of the analysis. Air quality effects predicted to result from the Project's operation are based on the anticipated vehicle miles traveled (VMT) and average network speed. Travel-demand forecasting results have been updated since the Alternatives Analysis was completed in 2006.

As stated in Chapter 3 of the Final EIS, the travel demand forecasting model predicts a maximum peak direction volume of 14,700 passengers during the a.m. two-hour peak period. As a result of updated ridership forecasts, the operating plan for the fixed guideway system has been revised and the system will have a minimum capacity of approximately 17,300 passengers per direction during the two-hour peak period. The fixed guideway system is planned to operate with two or three car trains with a capacity of between 325 and 500 passengers each. At three-minute headways during the peak period, that provides capacity for approximately 8,650 passengers per peak direction per peak hour. This figure applies in both directions for a total system capacity of approximately 17,300 passengers per peak hour. The numbers presented in your comment understate the capacity of the fixed guideway by a substantial margin.

In addition, a major benefit of the fixed guideway is that once built, it is flexible enough to accommodate significant growth. For example, the full capacity of the fixed guideway with four-car trains and 90-second headways is over 25,000 passengers per hour per direction or over 50,000 in total. Accordingly, the fixed guideway system will provide sufficient capacity based on travel demand forecasting results.

As shown in Table 6-1 of the Final EIS, the Project will cost $4.6 billion in 2009 dollars and $5.5 billion in inflated dollars, including finance charges.

As stated previously, the Managed Lane Alternative would not improve congestion on the H-1 Freeway. In addition, as shown in Table 3-10 in the Alternatives Analysis, the Managed Lane Alternative would have a negligible impact on VMT while the Fixed Guideway Alternative would decrease VMT by 3 percent. The Alternatives Analysis found that the Managed Lane Alternative would have generated the greatest amount of air pollution of the alternatives studied. The calculations included in the Draft and Final EISs consider total daily vehicle miles traveled at

the calculated operating speed. Any under-estimation of emissions would occur for all alternatives. Therefore, if the analysis systematically underestimates emissions from congested conditions, the relative reduction in emissions for the Fixed Guideway Alternative compared to the No Build, Transportation System Management, or Managed Lane Alternatives would be greater than the 0 to 8 percent improvement calculated at the time of the Alternatives Analysis.

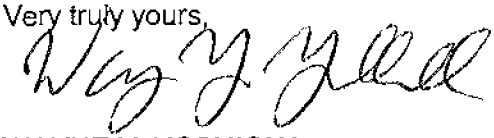
Chapter 2 of the Final EIS summarizes the alternatives screening and selection process. Beginning in the fall of 2005, an initial screening process considered alternatives identified through previous transit studies, a field review of the study corridor, an analysis of current population and employment data for the study corridor, a literature review of technology modes, ongoing work completed as part of the Oahu Regional Transportation Plan 2030 (ORTP) prepared by the Oahu Metropolitan Planning Organization (OahuMPO) (OahuMPO 2007), and public and agency comments received during the formal Alternatives Analysis scoping process.

The screening process is documented in the Honolulu High-Capacity Transit Corridor Project Alternatives Screening Memorandum (DTS 2006a). Three scoping meetings were held during the screening process in December 2005, which included a presentation of initial alternatives to the public, interested agencies, and officials to receive comments on the Purpose and Need, alternatives, and scope of the Alternatives Analysis. Refinements were made to the alternatives based on the public input during scoping.

After completion of screening in the winter of 2006, the following alternatives were studied in the Alternatives Analysis: No Build Alternative, Transportation System Management (TSM) Alternative, Managed Lane Alternative, and the Fixed Guideway Alternative. After review of the Alternatives Analysis Report and consideration of public comments, the City Council identified a fixed guideway transit system extending from Kapolei to UH Manoa with a connection to Waikiki as the Locally Preferred Alternative. This identification, which eliminated the TSM and Managed Lane Alternatives from further consideration, became Ordinance 07-001 on January 6, 2007. The NEPA process considered a range of alternatives that was consistent with the identified Locally Preferred Alternative. As discussed in Section 2.2, there were no alternatives that had not been previously studied and eliminated for good cause that would satisfy the Purpose and Need at less cost, with greater effectiveness, or less environmental or community impact.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,



WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
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Other Submission Method :	
Submission Date :	12/29/2008

Submission Content/Notes : 29 December, 2008

To:
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Director Department of Transportation Services
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650 South King St. 3rd Floor
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Subject: Comment on Draft Environmental Impact Statement (DEIS) "Honolulu High-capacity transit corridor Project", Issue: DEIS provides misleading information on Managed Lane Alternative (MLA)

Fact:
DEIS page 2-5, paragraph 4, states "The Managed Lane Alternative would have generated the greatest amount of air pollution, required the greatest amount of energy for transportation...."
Discussion:
1) Table 3-12 of the Alternative Analysis, a.m. peak hour Screenline Volume at Kalauao, shows that traffic volume on H-1 (full rated capacity 9,500 vph) rises from the current 11,000 vph to 17,400 vph in 2030 after the $6.0 Billion Rail is built and operating. Conclusion: After expenditure of $6.0 Billion for rail, traffic overload on H-1 will increase from 1,500 vph to nearly 8,000 vph and will not eliminate the traffic bottlenecks at the H-1/H-2 merge and at the Middle Street merge.
2) The three-lane MLA has the capacity to eliminate the two major H-1 bottlenecks:
From Table 3-12 of city 2006 Nov Alternative Analysis:
- Rail only: capacity = 6000 commuters per peak hour (equivalent 5000 vehicles per peak hour.)
- H-1 only: rated capacity = 9,500 vehicles per hour (equivalent 15,400 commuters per hour
- H-1 forecast yr 2030 traffic load = 17,500 vehicles per hour per City AA Table 3-12 (or 8,000 vph overload = 9,600 commuters per hour)

- Managed Lane three-Lane HOV Reversible Flyover: capacity = 6,000 high occupancy vehicles per hour (equivalent 21,600 commuters per hour). Capacity based on HOV use on Flyover by 200 express buses per peak hour , car pools, van pools, green cars and HOV2. (50 pns per express bus and 5800 vph at avge two persons per vehicle).

- Year 2030 commuter load by City AA Report = Rail (6000) + H-1 overload (9,600) + H-1 capacity (15,400) = 31,000 commuters.

2030 Load = 31,000 commuters per hour
Rail + H-1 = 21,400 commuters per hour
Managed Lane HOV + H-1 = 37,000 commuters per hour

Based on above calculations, rail does not have sufficient commuter capacity which will cause 9,600 commuters to be stuck in gridlock on H-1 or stuck at rail stations (especially at stations between Waipahu and

Kalihi). Managed Lane HOV Alternative will eliminate congestion and bottlenecks on H-1.
3) Rail will result in causing 17,400 vph to be stuck in gridlock on H-1 and will thus cause more pollution and more gas used by commuters. Conversely, the MLA will eliminate traffic gridlock on H-1, create more efficient commuter travel and will therefore cause less pollution and energy use than rail transit.

Recommendation:

It is recommended that the DEIS be revised throughout to indicate that the MLA causes less pollution and energy use than rail transit and that the Managed Lane Alternative be reinstated into the DEIS for further consideration as the locally preferred alternative.

Respectfully,

Ben Ramelb P.E.
1148 Ala Lilikoi St
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MUFI HANNEMANN
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WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT10/09-336588

Mr. Ben Ramelb
1148 Ala Lilikoi Street
Honolulu, Hawaii 96818

Dear Mr. Ramelb:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal dated December 29, 2008 with subject [Comment on Draft Environmental Impact Statement (DEIS) "Honolulu High-capacity transit corridor Project", Issue: DEIS provides misleading information on Managed Lane Alternative (MLA)]:

Traffic volumes in 2030 under any alternative will be higher than those observed under current conditions. As shown in the Alternatives Analysis Report (DTS 2006b), the Managed Lane Alternative would not eliminate congestion and bottlenecks on the H-1 Freeway. Table 3-12 in the Alternative Analysis Report shows that, under the No Build Alternative, there would be 18,049 vehicles per hour (vph) operating on the H-1 Freeway in 2030. Vehicle volumes rise to 18,327 vph (Two-direction Option) or 18,419 vph (Reversible Option) with the Managed Lane Alternative, while traffic volumes decrease to 17,209 vph with the 20-mile Fixed Guideway Transit Alternative. Accordingly, the Fixed Guideway Transit Alternative will reduce traffic volumes from those projected under the 2030 No Build Alternative.

Since the Draft EIS was published, the travel demand model has been refined by adding an updated air passenger model (which forecasts travel in the corridor related to passengers arriving or departing at Honolulu International Airport), defining more realistic drive access modes (driving alone or car pooling) to project stations and recognizing a more robust off-peak non-home-based direct demand element (trips that do not originate at home) based on travel surveys in Honolulu. These revisions were made based on consultation with FTA. As stated in Chapter 3 of the Final EIS, the travel demand forecasting model predicts a maximum peak direction volume of 14,700 passengers during the a.m. two-hour peak period. As a result of updated ridership forecasts, the operating plan for the fixed guideway system has been revised and the system will have a minimum capacity of approximately 17,300 passengers per direction during the two-hour peak period. The fixed guideway system is planned to operate with two- or three-car trains with a capacity of between 325 and 500 passengers each. At three-minute headways during the peak period, that provides capacity for approximately 8,650 passengers per peak direction per peak hour. This figure applies in both directions for a total system capacity of approximately 17,300 passengers per peak hour. The numbers presented in your comment understate the capacity of the fixed guideway by a substantial margin.

In addition, a major benefit of the fixed guideway is that once built, it is flexible enough to accommodate significant growth. For example, the full capacity of the fixed guideway with four-car trains and 90-second headways is over 25,000 passengers per hour per direction or over 50,000 in total. Accordingly, the fixed guideway system will provide sufficient capacity based on travel demand forecasting results.

To address your recommendation, as detailed in the Alternatives Analysis, the Managed Lane Alternative would result in greater air pollution emissions and energy consumption than the Fixed Guideway Transit Alternative. Air quality effects predicted to result from the Project's operation are based on the anticipated vehicle miles traveled (VMT) and average network speed. As shown in Table 3-10 in the Alternatives Analysis Report, the Managed Lane Alternative would have a negligible impact on VMT while the Fixed Guideway Alternative would decrease VMT by 3 percent. As stated previously, the Managed Lane Alternative will not improve traffic congestion on the H-1 Freeway.

Chapter 2 of the Final EIS summarizes the alternatives screening and selection process. Beginning in the fall of 2005, an initial screening process considered alternatives identified through previous transit studies, a field review of the study corridor, an analysis of current population and employment data for the study corridor, a literature review of technology modes, ongoing work completed as part of the Oahu Regional Transportation Plan 2030 (ORTP) prepared by the Oahu Metropolitan Planning Organization (OahuMPO) (OahuMPO 2007), and public and agency comments received during the formal Alternatives Analysis scoping process.

The screening process is documented in the Honolulu High-Capacity Transit Corridor Project Alternatives Screening Memorandum (DTS 2006a). Three scoping meetings were held during the screening process in December 2005, which included a presentation of initial alternatives to the public, interested agencies, and officials to receive comments on the Purpose and Need, alternatives, and scope of the Alternatives Analysis. Refinements were made to the alternatives based on the public input during scoping.

After completion of screening in the winter of 2006, the following alternatives were studied in the Alternatives Analysis: No Build Alternative, Transportation System Management (TSM) Alternative, Managed Lane Alternative, and the Fixed Guideway Alternative. After review of the Alternatives Analysis Report and consideration of public comments, the City Council identified a fixed guideway transit system extending from Kapolei to UH Manoa with a connection to Waikiki as the Locally Preferred Alternative. This identification, which eliminated the TSM and Managed Lane Alternatives from further consideration, became Ordinance 07-001 on January 6, 2007. The NEPA process considered a range of alternatives that was consistent with the identified Locally Preferred Alternative. As discussed in Section 2.2, there were no alternatives that had not been previously studied and eliminated for good cause that would satisfy the Purpose and Need at less cost, with greater effectiveness, or less environmental or community impact.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
Creation Date :	12/29/2008
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Other Submission Method :	
Submission Date :	12/29/2008

Submission Content/Notes : 29 December, 2008

To:
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Director Department of Transportation Services
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650 South King St. 3rd Floor
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Subject: Comment on Draft Environmental Impact Statement (DEIS) "Honolulu High-capacity transit corridor Project", Issue: DEIS traffic analysis shows traffic Congestion could cost Oahu jobs

Fact:
. The City Alternative Analysis, Table 3-12, shows that there will still be 17,500 vehicles per hour in 2030 on the H-1 (full rated capacity = 9,500 vehicles per hour) at Pearl City AFTER the $7.0 Billion Rail is built and operating.
Result: With rail, the above numbers show congestion will WORSEN after the $6.2 Billion Minimum operable Segment Rail is completed.

The DEIS Screenline Volumes for the 2030 Salt Lake Build Alternative Table 3-20, shows that with the Salt Lake Build Alternative at Screen line "D" :
- Kalauao Koko Head bound : Observed (forecast) Volume - AM Peak = 18,910 vehicles per hour (vph).
- Facility 2030 Capacity - AM Peak = 14, 650 vph - Reference: Table 3-12 Alternative Analysis.

Result: There will be 4,260 vph above the facility capacity (H-1 + HOV + Zipper + Kam+ Moanalua) at Kalauao which indicates a Level of Service (LOS) F AFTER the Salt Lake Rail is built. This conclusion is consistent with the conclusion using the numbers from the City's Alternativa analysis report. With rail, the above numbers show congestion will WORSEN after the $7.0 Billion full build-out Rail is completed.

Discussion:
Traffic congestion could cost state jobs. See http://www.ajc.com:80/metro/content/metro/stories/2008/11/13/transportation_study_traffic_economy.html
"Transportation woes could cost Georgia 320,000 potential jobs and $515 billion in economic benefits over the next 20 years if the state sticks to "continued traffic congestion or business as usual," according to a new state report. Traffic jams and the lack of access to reliable transportation in metro Atlanta will increasingly limit the number of jobs people can commute to, and the number of potential workers an employer can expect to attract, according to the study presented to the state Transportation Board."
Rail will worsen traffic congestion according to City and County of Honolulu DEIS Table 3-20 and AA table 3-12.
Conclusion: The traffic analysis included in the detailed Alternative

Analysis Table 3-12 and DEIS Table 3-20 show that a rail alternative "worsens" traffic congestion on most highways which could cost Oahu jobs.

Recommendation: Include additional cost-effective mass transit alternatives which will substantially reduce or eliminate traffic congestion in the West Oahu Traffic Corridor. These alternatives include BRT, 11 mile three-lane Managed Lane, elevated three-lane, 15 mile EzWay and two highway bypasses around the bottlenecks at Pearl City and at Middle street. Each of these alternatives are estimated to cost less than $1.2 Billion, much less than the $6.2 Billion Rail Alternatives which will worsen traffic congestion.

Respectfully,

Ben Ramelb P.E.
1148 Ala Lilikoi St
Honolulu, HI
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SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT10/09-336592

Mr. Ben Ramelb
1148 Ala Lilikoi Street
Honolulu, Hawaii 96818

Dear Mr. Ramelb:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal dated December 29, 2008 with subject [Comment on Draft Environmental Impact Statement (DEIS) "Honolulu High-capacity transit corridor Project", Issue: DEIS traffic analysis shows traffic Congestion could cost Oahu jobs]:

Neither Table 3-12 in the Alternative Analysis nor Table 3-20 in the Draft EIS show that rail would worsen traffic. Table 3-12 shows that roadway conditions will be worse in 2030 whether the fixed guideway, managed lane, or more buses are implemented. However, traffic conditions will be better with the fixed guideway compared to conditions without it. As shown in the Alternatives Analysis Report (DTS 2006b), the Managed Lane Alternative would not eliminate congestion and bottlenecks on the H-1 Freeway. Table 3-12 in the Alternative Analysis Report shows that, under the No Build Alternative, there would be 18,049 vehicles per hour (vph) operating on the H-1 Freeway in 2030. Vehicle volumes rise to 18,327 vph (Two-direction Option) or 18,419 vph (Reversible Option) with the Managed Lane Alternative, while traffic volumes decrease to 17,209 vph with the 20-mile Fixed Guideway Transit Alternative. Accordingly, the Fixed Guideway Transit Alternative will reduce traffic volumes from those projected under the 2030 No Build Alternative.

Table 3-20 in the Draft EIS shows 20,800 vehicles per hour (vph) at the Kalauao screenline (virtual lines across the corridor used to measure total travel at that point) in the Koko Head-bound direction during the a.m. peak hour with the No Build Alternative. This number decreases 9 percent with the addition of the Salt Lake Alternative to 18,910 vph. Numbers have been updated for the Final EIS based on the Airport Alternative and refinements to the travel demand forecasting model to account for non-home-based direct-demand trips (trips that do not originate or end at home) during off-peak periods. In addition, the air passenger model (which forecasts travel in the corridor related to passengers arriving or departing at Honolulu International Airport) was updated to reflect current conditions. These revisions were made based on consultation with FTA. The updated results continue to show that traffic will decrease with the addition of the Project. Tables 3-9 and 3-10 in the Final EIS shows an 11 percent decrease in vph at this screenline during the a.m. peak hour in the Koko Head-bound direction and a 10 percent reduction during the p.m. peak hour in the Ewa-bound direction. This demonstrates that the fixed guideway system will decrease traffic congestion at this location.

Regarding your recommendation, non-rail alternatives, including a Managed Lane Alternative, were evaluated in the Alternative Analysis. Scoping carried out under the NEPA process confirmed that the alternatives previously studied and eliminated for good cause would not satisfy the Purpose and Need at less cost, with greater effectiveness, or with less environmental or community impact. During the scoping process, several comments were received requesting reconsideration of the Managed Lane Alternative. These were considered and rejected during the Alternatives Analysis process. Because no new information was provided that would have substantially changed the findings of the Alternatives Analysis process regarding the Managed Lane Alternative, this alternative was not included in the Draft EIS. As a result, the Final EIS has not been revised to include non-rail options.

As stated in Chapter 2 of the Final EIS, prior to selecting an elevated fixed guideway system, a variety of high-capacity transit options were evaluated during the Primary Corridor Transportation Project (1998-2002) and Alternatives Analysis. Options evaluated and rejected include an exclusively at-grade fixed guideway system using bus rapid transit vehicles. In addition to comments received during the Alternatives Analysis and EIS scoping sessions, these studies provided a critical foundation for the conclusion that an elevated system would result in the best overall performance and better support of the Purpose and Need for the Project. In addition, the proposed Bus Rapid Transit Alternative, as stated in your letter, is a variation of the Transportation System Management Alternative that was evaluated in the Alternatives Analysis. While this alternative has merit for cost-effectiveness, its overall system benefit would be very low.

System-wide congestion will be greater in 2030 than today. While the Managed Lane Alternative would reduce spot-congestion (measured as vehicle hours of delay) in some locations, it would also increase overall system congestion by inducing additional travelers to drive, which would increase congestion on arterial and collector facilities accessing the freeways. In addition, once a vehicle leaves the managed lane, that vehicle is still subjected to congestion on surrounding roadways. Meanwhile the Fixed Guideway Transit Alternative will decrease congestion compared to the No Build Alternative.

There could be many other versions of the type of system with minor adaptations to suit one or another special concern. In the end, the above approaches all have similar challenges as a primary solution to Honolulu's transportation problems. They do not reduce congestion, increase the reliability of the transportation system, serve future land use plans, or improve the

fairness of and access to the transportation system. They also do not offer an alternative to perpetuating a reliance on limited existing travel modes. For example, localized bypasses would not meet system goals for corridor-wide benefits to mobility, reliability, access, and equity. In sum, they do not address the Purpose and Need of the Project.

The EzWay 15-mile, three-lane viaduct concept was developed as a hybrid of a plan for elevated toll lanes and some form of rubber-tire-on-concrete transit system. It is similar to the Managed Lane Alternative that was thoroughly evaluated in the Alternatives Analysis, which also accommodated both single occupant and transit vehicles. No known cost estimate for the EzWay proposal was prepared or validated by a qualified registered professional engineer. As a point of reference, the State of Hawaii's Highway Modernization Plan dated January 22, 2009, estimates the cost of the Nimitz Viaduct at $600 million for an approximately 2.5-mile elevated highway with two lanes, which equals $240 million per mile. Using this estimate, a 15-mile facility would cost approximately $3.6 billion.

Localized bypasses would not meet system goals for corridor-wide benefits to mobility, reliability, access, and equity. The Hawaii Department of Transportation, which is responsible for the freeway system, has evaluated needs for the freeway system and identified the highway projects that would be most efficient at reducing congestion on Oahu. The projects, including a Nimitz Flyover, are listed in Table 2-3 of the Draft EIS and included in the analysis for all project alternatives. Effects of the Nimitz Flyover on traffic conditions in 2030 are discussed in Section 3.4.2 of the Final EIS. Travel on the Nimitz Flyover was included for the following travel pairs under the No Build Alternative: Kapolei to Downtown, Ewa to Downtown, and Mililani to Downtown. As shown in Figure 3-7 of the Final EIS, the Nimitz Flyover does improve transit travel times with the No Build Alternative between certain travel pairs (e.g., between Mililani and Downtown) compared to 2007 conditions. However, as also shown in this figure, travel times improve substantially more with the addition of the Project. As a point of clarification, a Final EIS was never prepared for the Nimitz Flyover.

Lastly, as shown in Table 6-1 of the Final EIS, the Project will cost $4.6 billion in 2009 dollars and $5.5 billion in inflated dollars, including finance charges.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
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Submission Date :	12/29/2008

Submission Content/Notes : 29 December, 2008

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Subject: Comment on Draft Environmental Impact Statement (DEIS) "Honolulu High-capacity transit corridor Project", Issue- Project Construction Phasing will not provide early traffic relief

Fact:
The rail project construction phasing is proposed in four phases as discussed on DEIS page 2-38 and as shown on Figure 2-44 as follows:

- East Kapolei to Pearl Highlands (First Construction Phase)
- Pearl Highlands to Aloha Stadium (Second Construction Phase)
- Aloha Stadium to Middle Street (Third Construction Phase)
- Middle Street to Ala Moana Shopping Center (Fourth and final Construction Phase)

Discussion:
The primary purpose of any mass transit system is to provide traffic relief and to provide relief in the near term. The major West and Central Oahu traffic bottlenecks are at the Middle Street merge and at the H-1/H2 merge. Construction phases for the rail should be prioritized to reduce the traffic bottlenecks at these two locations. Therefore, the project construction phasing shown above should be reversed:

- Middle Street to Ala Moana Shopping Center (First Construction Phase)
- Aloha Stadium to Middle Street (Second Construction Phase)
- Pearl Highlands to Aloha Stadium (Third Construction Phase)
- East Kapolei to Pearl Highlands (Fourth Construction Phase)

This revised project phasing is logical because:
a) The Middle Street to Ala Moana Shopping Center first phase will provide early traffic relief to the Middle Street bottle neck.
b) The funding source for the entire 20 mile segment is not guaranteed, recognizing that the General Excise Tax is not meeting projections in revenue due to the expected long term slumping economy. The taxpayer will not tolerate any increase in property tax or GET to fund any rail fund shortfall.
c) The funding amount from the Federal Transit Authority is not guaranteed.
d) If rail funds are delayed, providing traffic relief to the traffic bottlenecks on H-1 will be delayed.

e) Each phase for rail will provide the maximum bang for the dollar. The rail will be completely be useable and serve the most number of commuters as each phase is completed. Conversely, the Kapolei to Pearl Highlands would serve very few commuters as most commuters will be destined for east of Pearl Harbor and beyond in the easterly direction.

Vehicle Maintenance and Storage Facility for each construction phase can be temporarily established to support each construction phase as modified:
a) For the Middle Street phase, some 40 acres could be obtained along Lagoon Drive to include portions of Keehi Lagoon Park, Airport vacant areas and commercial businesses including Used Car Lots. At least 10 acres for park and ride can be acquired in the airport area alongside Aolele Street and Lagoon Drive.
b) For the Aloha Stadium phase, portions of the Aloha Stadium Parking lot can be temporarily used for the Storage Facility and temp facilities for vehicle maintenance.
c) For the Pearl Highlands Phase, a 43-acre vacant site near Leeward Community College is available (DEIS figure 2-42).
d) A 41-acre site is identified for the Kapolei phase (DEIS figure 2-41).

Conclusion:
Construction of the Middle Street to Ala Moana Phase as a first priority is consistent with providing near-term traffic relief, will initially serve the most number of commuters, will be completely useable and cost effective, and will not force the taxpayer to pay more taxes to fund additional rail segments should rail funding sources not achieve revenue projections.

Recommendation:
The DEIS should reverse the construction project phasing as discussed above starting with the Middle Street to Ala Moana Shopping Center as the First Phase.

Respectfully,

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DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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DEPUTY DIRECTOR

June 11, 2010

RT10/09-336598

Mr. Ben Ramelb
1148 Ala Lilikoi Street
Honolulu, Hawaii 96818

Dear Mr. Ramelb:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal dated December 29, 2008 with subject line [Comment on Draft Environmental Impact Statement (DEIS) "Honolulu High-capacity transit corridor Project", Issue-Project Construction Phasing will not provide early traffic relief]:

As described in Section 2.5.10, Project Phasing, of the Final EIS, to support phased opening of the system, the first construction phase must be connected to a maintenance and storage facility, which requires considerable land. The first phase of the Project must be connected to the maintenance and storage facility because, in addition to maintenance of equipment and ongoing operations, this facility houses the main control center for the entire Project. Accordingly, the required testing and operation of the system could not be completed without access to it. No location has been identified closer to Downtown with sufficient available land to construct a maintenance and storage facility. Therefore, construction will begin between East Kapolei and Leeward Community College. The Project will be constructed in phases to accomplish the following:

- *Match the anticipated schedule for right-of-way acquisition and utility relocations*
- *Reduce the time that each area will experience traffic and community disturbances*
- *Allow for multiple construction contracts with smaller contract size to promote more competitive bidding*
- *Match the rate of construction to what can be maintained with local workforce and available financial resources*
- *Balance expenditure of funds to minimize borrowing*

The portion of the corridor in the Ewa direction of Pearl Highlands is less developed than the areas in the Koko Head direction. Right-of-way can be obtained more quickly at the west end of the Project; therefore, overall project construction can begin earlier, resulting in lower total construction costs. Construction is planned to continue uninterrupted in the Koko Head direction from Pearl Highlands to Aloha Stadium, Kalihi, and finally to Ala Moana Center.

The financial plan is balanced for the entire Project so there will not be a situation in which only a portion of the system will be built. If there is a shortfall, additional revenue sources will be considered. Section 6.6 of the Final EIS discusses risks and uncertainties, as well as potential sources to cover shortfalls.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
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Submission Date :	12/29/2008

Submission Content/Notes : 29 December, 2008

To:
Mr. Wayne Yoshioka
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650 South King St. 3rd Floor
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HI 96813
FAX: (808) 587-6080

Subject: Comment on Draft Environmental Impact Statement (DEIS) "Honolulu High-capacity transit corridor Project", Issue: Displacement of Homes and Churches should be minimized

Fact:
The DEIS Table 2-6 and Figure 2-20 shows the park and ride facility at Pearl Highlands to be 11 acres and 1600 vehicular parking spaces. The 11 acres "Banana Patch" contain several family homes, farmland and church facilities which have been in existence for 30 to 60 years.

Discussion:
It would be considered an environmental injustice to displace the many families on the 11 acre property because there are better alternatives to the 11 acre Park-and-Ride facility.

Figure 2-42 shows a 43-acre vacant adjacent to the Leeward Community College (LCC site). The DEIS states that this 43 acre LCC site is reserved for potential use for a Vehicle Maintenance and Storage Area (VMSA). Since only one VMSA is needed for the rail project, there are three alternative sites for the VMSA:

1) At the Honolulu Airport east end, some 40 acres could be acquired along Lagoon Drive and Aolele Street to include portions of Keehi Lagoon Park, Airport vacant areas and commercial businesses including Budget Car Rental
2) Portions of the Aloha Stadium Parking lot can be used for the VMSA. Multi-story vehicular parking structures could be built to accommodate the loss in sports events parking.
3) A 41-acre site for VMSA is identified in Kapolei (DEIS figure 2-41).

A further alternative is to reduce the size of the VMSA at the 43-acre LCC site by splitting the VMSA facility between the LCC site and one of the other alternative sites mentioned above.. This area reduction will allow the reservation of 10 to 15 acres for a park and ride facility on the LCC site.

The best alternative is to dedicate the entire vacant 43-acre LCC site for a 23-acre Transit Oriented Development (TOD) and a 20-acre Park-and-ride facility for 3,000 vehicles for rail commuters.

Conclusion:
a) The use of the LCC site for Park and Ride instead of the 11-acre "Banana Patch " site will eliminate the need to displace several families, farm land and church facilities.
b) There are alternative sites for VMSA facilities other than the LCC site.
c) The LCC site provides a greater amount of parking spaces for rail commuters.

Recommendation:
It is recommended that the LCC site be used for a 23-acre Transit Oriented Development (TOD) and a 20-acre Park-and-ride facility for 3,000 vehicles for rail commuters.

Respectfully,

Ben Ramelb P.E.
1148 Ala Lilikoi St
Honolulu, HI
96818

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DEPUTY DIRECTOR

June 11, 2010

RT10/09-336600

Mr. Ben Ramelb
1148 Ala Lilikoi Street
Honolulu, Hawaii 96818

Dear Mr. Ramelb:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal dated December 29, 2008 with subject line [Comment on Draft Environmental Impact Statement (DEIS) "Honolulu High-capacity transit corridor Project", Issue: Displacement of Homes and Churches should be minimized]:

As discussed in Section 4.7.6 of the Final EIS, the City has been coordinating with residents of the Banana Patch community since October 2008. Every household has been visited by City staff, right-of-way staff, and engineering staff to discuss the Project, as well as special needs and relocation assistance for residents who will be displaced. Strategic outreach was conducted for this neighborhood, and it was found the residents were mostly interested in learning more about the right-of-way acquisition process. Residents asked when acquisition might occur, how their property would be appraised, and how soon they might receive compensation. Residents of the community did not object to being relocated to decent, safe, and sanitary housing in compliance with the Federal Uniform Relocation Assistance and Real Property Acquisition Policies Act. Nor was there concern expressed about keeping the community intact for relocation purposes.

Leeward Community College was evaluated as a site for the park-and-ride facility to avoid displacement of families living in the area of the Pearl Highlands Station. This alternative was evaluated in the Draft EIS as an avoidance alternative in Chapter 5. The analysis concluded that this alternative was not feasible. "Under this alternative, the H-2 Freeway access ramp would need to be re-designed from a one-way ramp to a two-way ramp. This would cost approximately $50 million more than the ramps that would serve the Pearl Highlands Station. For this location, the access road for Leeward Community College would also require improvement, which would cost approximately $25 million. In addition, the guideway's crossing of the H-1 Freeway would need to be realigned, costing an additional $5 million."

In addition to the $80 million of roadway and guideway improvements discussed above, it would cost an additional $1 million to acquire right-of-way from the Hawaii Laborers Training Program site Koko Head and makai of the ramp connecting Farrington Highway to Kamehameha Highway, as well as loss of parking for Leeward Community College, which would cost $30 million to replace. These costs would be offset by approximately $20 million since the Pearl Highlands Station would not be constructed under this avoidance alternative.

Your letter suggested three alternative sites for the maintenance and storage facility. As stated in Chapter 2 of the Final EIS, the site near Leeward Community College has been identified as the preferred location for the maintenance and storage facility. Your suggestion for sites along Lagoon Drive and Aloha Stadium cannot be used as both Keehi Lagoon Park and Aloha Stadium are recreational facilities that may not be converted to transportation use per Section 4(f) of the Transportation Act of 1966. In addition, splitting the maintenance and storage functions between multiple sites would make the rail operations less efficient, increase both construction and operating costs, and would require more property acquisitions. Your final suggestion to use a 43-acre site near LCC for park-and-ride and transit-oriented development would be difficult to implement due to poor highway access. Furthermore, this site is a potential location for the maintenance and storage facility.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
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Submission Date :	01/07/2009

Submission Content/Notes : 29 December, 2008

To:
Mr. Wayne Yoshioka
Director Department of Transportation Services
City and County of Honolulu
650 South King St. 3rd Floor
Honolulu
HI 96813
FAX: (808) 587-6080

Subject: Comment on Draft Environmental Impact Statement (DEIS) "Honolulu High-capacity transit corridor Project", Issue: Land Acquisition should be minimized by routing the fixed guideway over Nimitz Highway instead of over Dillingham Boulevard.

Fact:
Numerous land acquisitions are required to build the fixed guideway along Dillingham Blvd which will cause disruption to businessess, homes and increase traffic congestion on Dillingham Blvd.

A fixed guideway route over Nimitz Highway instead of along Dillingham Blvd will cause less disruption and result in lower cost for the project.

It is noted that the Oahu Regional Transportation Plan (ORTP) 2030 shows a two lane Nimitz Flyover over the median of Nimitz Highway which could conflict with the proposed fixed guideway over Nimitz Highway. If the Nimitz Flyover is built, it is suggested that both the Nimitz "Flyover" and the fixed guideway be built within the elevated Nimitz Highway right of way corridor. In this case, the two-lane "Nimitz HOV Flyover (reversible)" can be built alongside and parallel to the fixed guideway transit. The fixed guideway with a capacity of 6,000 commuters per hour and the two-lane "Nimitz Flyover", with a capacity of 4,000 vehicles per hour, should be adequate to substantially reduce the bottleneck at the Middle Street Merge and on Dillingham Blvd between Keehi Lagoon and downtown Hotel Street.
The Nimitz Flyover (reversible) should be connected to the Airport Viaduct at Keehi Lagoon to Alakea Street/Halekauwila St via an underpass and to Hotel Street Mall via an elevated busway. These connections are described in a Managed Lane Study "Transportation Alternatives Analysis for Mitigating Traffic congestion between Leeward Oahu and Honolulu". The full report is available at www.eng.hawaii.edu/~panos/UHCS.pdf.
The initial 2005 cost for the 10 mile Tampa Reversible was $320 million or $32 Million per highway mile, however, a geotechnical design error increased the cost to $420 million or $42 million per mile. Using a geographic and escalation factor of 100 percent, the 3-mile Nimitz HOV Reversible Flyover at $60 to $80 million per mile would cost between $180 million to $240 million.

Recommendation:
It is recommended that the fixed guideway route be over Nimitz Highway instead of Dillingham Blvd to minimize disruption of homes and

businesses and minimize traffic congestion along Dillingham Blvd.

Respectfully,

Ben Ramelb P.E.
1148 Ala Lilikoi St
Honolulu, HI
96818

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June 11, 2010

RT10/09-336609

Mr. Ben Ramelb
1148 Ala Lilikoi Street
Honolulu, Hawaii 96818

Dear Mr. Ramelb:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal dated December 29, 2008 with subject line [Comment on Draft Environmental Impact Statement (DEIS) "Honolulu High-capacity transit corridor Project", Issue: Land Acquisition should be minimized by routing the fixed guideway over Nimitz Highway instead of over Dillingham Boulevard]:

Your comments have been noted. As stated in the Honolulu High-Capacity Transit Corridor Project Alternatives Screening Memorandum (DTS 2006a), five alignments between Keehi Interchange and Moanalua Stream to Iwilei Road were studied, including an alignment along Nimitz Highway. The Screening Memorandum concluded that a fixed-guideway alignment along Nimitz Highway would conflict with the elevated high-occupancy vehicle facility proposed in the 2030 Oahu Regional Transportation Plan. The Nimitz Highway alignment would provide employee access to industrial facilities makai of the roadway, but much of the highway in this area has long standing industrial development and does not offer as much opportunity for new development as the Dillingham Boulevard alignment. The projected population and employment

densities along the Nimitz Highway were the lowest of all the alignments in this section. As a result of these findings, the Nimitz Highway alignment was not carried forward into the Alternatives Analysis.

Any comments you may have on the Nimitz Flyover Project should be directed to the Hawaii Department of Transportation. The State of Hawaii's Highway Modernization Plan dated January 22, 2009, estimates the cost of the Nimitz Viaduct at $600 million for an approximately 2.5-mile elevated highway with two lanes, which equals $240 million per mile.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
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Submission Date :	02/02/2009

Submission Content/Notes : 29 December, 2008

To:
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FAX: (808) 587-6080

Subject: Comment on Draft Environmental Impact Statement (DEIS) "Honolulu High-capacity transit corridor Project", Issue: Fixed Guide way Alternative is not Cost Effective because it does not provide traffic relief despite its cost of at least $6.0 Billion
Facts:
Table 3-12 of the 2006 Alternative Analysis shows that the a.m. Koko Head Bound at Kalauao Stream traffic volume on H-1 Freeway (volume capacity = 9,500 vph) will increase from 10,960 vehicles per hour to 17,209 vph in year 2030. This congestion will increase after the $6.0 Billion Fixed guideway is built and operating. This raises the question: Why build a $6.0 Billion rail if it does not eliminated or substantially reduce the congestion on H-1 at Kalauao Stream? The very high cost of the rail is certainly not cost effective if it does not reduce the congestion on H-1 at the H-1/H-2 merge and at the H-1 middle Street merge during the a.m Koko Head bound peak hour traffic.
Discussion:
A combination of a new Kamehameha Flyover at a cost of $320 million and a Nimitz Flyover at a cost of $240 million is cost effective which will eliminate the congestion on H-1 at Kalauao Stream and at Middle Street merge and is a superior alternative to the fixed guideway.
Kamehameha Flyover, Reversible HOV:
The Kamehameha HOV Flyover (Reversible) is a 3-mile reversible, elevated, three-lane structure over the median of Kamehameha Highway from the H-1/H-2 merge at the Waiawa Interchange to the Airport Viaduct just east of the Aloha Stadium. The Flyover would be built similar to the Tampa Elevated three-lane Reversible HOV as described in- http://www.tollroadsnews.com/node/172 .
The Kamehameha Flyover would be connected to H-1, H-2, Kamehameha Highway and Farrington Highway at the west end and to the Airport Viaduct at the east end. These connections are described in a Managed Lane Study "Transportation Alternatives Analysis for Mitigating Traffic congestion between Leeward Oahu and Honolulu". The full report is available at www.eng.hawaii.edu/~panos/UHCS.pdf.
The initial 2005 cost for the 10 mile Tampa Reversible was $320 million or $32 Million per highway mile, however, a geotechnical design error increased the cost to $420 million or $42 million per mile. Using a geographic and escalation factor of 100 percent, the 4-mile Kamehameha HOV Flyover at $60 to $80 million per mile would cost between $240 million to $320 million.
The Kamehameha Three-Lane HOV Reversible Flyover has a capacity of 6,000 high occupancy vehicles per hour (equivalent 21,600

commuters per hour). This capacity is based on HOV use on Flyover by 200 express buses per peak hour , car pools, van pools, green cars and HOV2. (50 pns per express bus and 5800 vph at avge 2 pns per vehicle).
There is a projected 8,000 vph overload on H-1 during am peak at Kalauao Stream per Table 3-12 of the Alternative Analysis. This 8,000 vph overload equates to 9,600 commuters per hour. Therefore, the three-lane Kamehameha Flyover (cap = 21,600 commuters) has ample capacity to accommodate the H-1 overload (9,600 commuters).

The Draft Environmental Impact Statement (DEIS) - Honolulu High-Capacity Transit Corridor Project Nov 2008 , shows the rail route over Kamehameha Highway between Pearl City and Aloha Stadium which could conflict with the proposed three-lane "Kamehameha Flyover" route outlined above. If the rail is built, it is suggested that both the Kamehameha Highway "Flyover" and the Rail be built within the elevated Kamehameha Highway corridor. In this case, only a two-lane "Kamehameha Flyover" is needed (instead of three-lanes) to be built alongside and parallel to the Rail transit. The rail with a capacity of 6,000 commuters per hour and the two-lane "Kamehameha Flyover", with a capacity of 4,000 vehicles per hour, should be adequate to substantially reduce the bottleneck at the H-1/H-2 merge and the traffic congestion on H-1 between Pearl City and Aloha Stadium.
Nimitz Flyover, Reversible HOV:
The Nimitz HOV Flyover is a 3-mile reversible, elevated, three-lane structure over the Nimitz Highway median from the Airport Viaduct at Keehi Lagoon to Hotel Street and Alakea St/Halekauwila St. The Flyover would be built similar to the Tampa Elevated three-lane Reversible HOV as described in-
http://www.tollroadsnews.com/node/172 .
One of the three lanes would exit the Flyover at Waikamilo Rd. to provide access to job centers in Kalihi, resulting in the Flyover having only two lanes entering downtown. The downtown terminal connections from the Nimitz HOV Flyover include an elevated busway from Iwilei to Hotel Street and a single lane underpass to both Alakea St/Halekauwila Streets. These connections are described in a Managed Lane Study "Transportation Alternatives Analysis for Mitigating Traffic congestion between Leeward Oahu and Honolulu". The full report is available at www.eng.hawaii.edu/~panos/UHCS.pdf.
The initial 2005 cost for the 10 mile Tampa Reversible was $320 million or $32 Million per highway mile, however, a geotechnical design error increased the cost to $420 million or $42 million per mile. Using a geographic and escalation factor of 100 percent, the 3-mile Nimitz HOV Flyover at $60 to $80 million per mile would cost $180 million to $240 million.
The "Nimitz Flyover" has an approved Final Environmental Impact Statement which allows for early construction.

Conclusion:
The $6.0 Billion Fixed guideway rail is NOT cost effective because it does not eliminate the congestion at the H-1/H-2 merge and at the H-1 Middle Street merge while the $320 million Kamehameha Flyover and $240 million Nimitz Flyover are very cost effective because both have

lower construction cost as compared with the Fixed rail guideway.

Recommendation:
It is recommended that DEIS include a Kamehameha Flyover (reversible three lane elevated) and a Nimitz Flyover (reversible three lane elevated) as a transit Alternative to provide traffic relief.
Respectfully,

Ben Ramelb P.E.
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June 11, 2010

RT10/09-336610

Mr. Ben Ramelb
1148 Ala Lilikoi Street
Honolulu, Hawaii 96818

Dear Mr. Ramelb:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

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Regarding your first point, as described in Section 2.5.10 of the Final EIS, to support phased opening of the system, the first construction phase must be connected to a maintenance and storage facility, which requires considerable land. The first phase of the Project must be connected to the maintenance and storage facility because, in addition to maintenance of equipment and ongoing operations, this facility houses the main control center for the entire Project. Accordingly, the required testing and operation of the system could not be completed without access to it. No location has been identified closer to Downtown with sufficient available land to construct a maintenance and storage facility. Therefore, construction will begin between

East Kapolei and Leeward Community College. The Project will be constructed in phases to accomplish the following:

- *Match the anticipated schedule for right-of-way acquisition and utility relocations*
- *Reduce the time that each area will experience traffic and community disturbances*
- *Allow for multiple construction contracts with smaller contract size to promote more competitive bidding*
- *Match the rate of construction to what can be maintained with local workforce and available financial resources*
- *Balance expenditure of funds to minimize borrowing*

The portion of the corridor in the Ewa direction of Pearl Highlands is less developed than the areas in the Koko Head direction. Right-of-way can be obtained more quickly at the west end of the Project; therefore, overall project construction can begin earlier, resulting in lower total construction costs. Construction is planned to continue uninterrupted in the Koko Head direction from Pearl Highlands to Aloha Stadium, Kalihi, and finally to Ala Moana Center.

The financial plan is balanced for the entire Project so there will not be a situation in which only a portion of the system will be built. If there is a shortfall, additional revenue sources will be considered. Section 6.6 of the Final EIS discusses risks and uncertainties and potential sources to cover shortfalls.

Regarding your second point, Section 1.7 of the Final EIS discusses the Purpose and Need of the Project. As stated in this section, the reason for the fixed guideway is not only to help relieve congestion, but to offer travelers an alternative to the car. There is currently no option but to drive for most people and congestion is increasing as a result.

Neither the Alternative Analysis nor the Draft or Final EISs show that rail would worsen traffic. Table 3-12 in the Alternatives Analysis shows that roadway conditions will be worse in 2030 whether the fixed guideway, managed lane, or more buses are implemented. However, traffic conditions will be better with the fixed guideway compared to conditions without it. The Alternatives Analysis showed that rail decreases congestion more effectively than any of the other options studied in the Alternatives Analysis. The Managed Lane Alternative would not eliminate congestion and bottlenecks on the H-1 Freeway. Table 3-12 in the Alternative Analysis Report shows that, under the No Build Alternative, there would be 18,049 vehicles per hour (vph) operating on the H-1 Freeway in 2030. Vehicle volumes rise to 18,327 vph (Two-direction Option) or 18,419 vph (Reversible Option) with the Managed Lane Alternative, while traffic volumes decrease to 17,209 vph with the 20-mile Fixed Guideway Transit Alternative. Accordingly, the Fixed Guideway Transit Alternative will reduce traffic volumes from those projected under the 2030 No Build Alternative.

Localized bypasses would not meet system goals for corridor-wide benefits to mobility, reliability, access, and equity. The Hawaii Department of Transportation, which is responsible

for the freeway system, has evaluated needs for the freeway system and identified the highway projects that would be most efficient at reducing congestion on Oahu. The projects, including a Nimitz Flyover, are listed in Table 2-3 of the Draft EIS and included in the analysis for all project alternatives. Effects of the Nimitz Flyover on traffic conditions in 2030 are discussed in Section 3.4.2 of the Final EIS. Travel on the Nimitz Flyover was included for the following travel pairs under the No Build Alternative: Kapolei to Downtown, Ewa to Downtown, and Mililani to Downtown. As shown in Figure 3-7 of the Final EIS, the Nimitz Flyover does improve transit travel times with the No Build Alternative between certain travel pairs (e.g., between Mililani and Downtown) compared to 2007 conditions. However, as also shown in this figure, travel times improve substantially more with the addition of the Project. The important finding in the Final EIS is that conditions on the highway will be better with rail compared to what they would be if the Project were not built even after the Nimitz Flyover, improvements to the H-1 Freeway, and all other projects in the OahuMPO Regional Transportation Plan are built.

As shown in Table 6-1 of the Final EIS, the Project will cost $4.6 billion in 2009 dollars and $5.5 billion in inflated dollars, including finance charges. The State of Hawaii's Highway Modernization Plan dated January 22, 2009, estimates the cost of the Nimitz Viaduct at $600 million for an approximately 2.5-mile elevated highway with two lanes, which equals $240 million per mile.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
Creation Date :	2/2/2009
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Submission Date :	02/02/2009

Submission Content/Notes : 29 December, 2008

To:
Mr. Wayne Yoshioka
Director Department of Transportation Services
City and County of Honolulu
650 South King St. 3rd Floor
Honolulu
HI 96813
FAX: (808) 587-6080

Subject: Comment on Draft Environmental Impact Statement (DEIS) "Honolulu High-capacity transit corridor Project", Issue: Land Acquisition should be minimized by routing the fixed guideway over Nimitz Highway instead of over Dillingham Boulevard.

Fact:
Numerous land acquisitions are required to build the fixed guideway along Dillingham Blvd which will cause disruption to businessess, homes and increase traffic congestion on Dillingham Blvd.

A fixed guideway route over Nimitz Highway instead of along Dillingham Blvd will cause less disruption and result in lower cost for the project.

It is noted that the Oahu Regional Transportation Plan (ORTP) 2030 shows a two lane Nimitz Flyover over the median of Nimitz Highway which could conflict with the proposed fixed guideway over Nimitz Highway. If the Nimitz Flyover is built, it is suggested that both the Nimitz "Flyover" and the fixed guideway be built within the elevated Nimitz Highway right of way corridor. In this case, the two-lane "Nimitz HOV Flyover (reversible)" can be built alongside and parallel to the fixed guideway transit. The fixed guideway with a capacity of 6,000 commuters per hour and the two-lane "Nimitz Flyover", with a capacity of 4,000 vehicles per hour, should be adequate to substantially reduce the bottleneck at the Middle Street Merge and on Dillingham Blvd between Keehi Lagoon and downtown Hotel Street.
The Nimitz Flyover (reversible) should be connected to the Airport Viaduct at Keehi Lagoon to Alakea Street/Halekauwila St via an underpass and to Hotel Street Mall via an elevated busway. These connections are described in a Managed Lane Study "Transportation Alternatives Analysis for Mitigating Traffic congestion between Leeward Oahu and Honolulu". The full report is available at www.eng.hawaii.edu/~panos/UHCS.pdf.
The initial 2005 cost for the 10 mile Tampa Reversible was $320 million or $32 Million per highway mile, however, a geotechnical design error increased the cost to $420 million or $42 million per mile. Using a geographic and escalation factor of 100 percent, the 3-mile Nimitz HOV Reversible Flyover at $60 to $80 million per mile would cost between $180 million to $240 million.

Recommendation:
It is recommended that the fixed guideway route be over Nimitz Highway instead of Dillingham Blvd to minimize disruption of homes and

businesses and minimize traffic congestion along Dillingham Blvd.

Respectfully,

Ben Ramelb P.E.
1148 Ala Lilikoi St
Honolulu, HI
96818

Copy to:
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FTA Region IX
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San Francisco, CA 94105
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MUFI HANNEMANN
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WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT10/09-336614

Mr. Ben Ramelb
1148 Ala Lilikoi Street
Honolulu, Hawaii 96818

Dear Mr. Ramelb:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal dated December 29, 2008 with subject line [Comment on Draft Environmental Impact Statement (DEIS) "Honolulu High-capacity transit corridor Project", Issue: Land Acquisition should be minimized by routing the fixed guideway over Nimitz Highway instead of over Dillingham Boulevard]:

Your comments have been noted. As stated in the Honolulu High-Capacity Transit Corridor Project Alternatives Screening Memorandum (DTS 2006a), five alignments between Keehi Interchange and Moanalua Stream to Iwilei Road were studied, including an alignment along Nimitz Highway. The Screening Memorandum concluded that a fixed guideway alignment along Nimitz Highway would conflict with the elevated high-occupancy vehicle facility proposed in the 2030 Oahu Regional Transportation Plan. The Nimitz Highway alignment would provide employee access to industrial facilities makai of the roadway, but much of the highway in this area has long standing industrial development and does not offer as much opportunity for new development as the Dillingham Boulevard alignment. The projected population and employment

densities along the Nimitz Highway were the lowest of all the alignments in this section. As a result of these findings, the Nimitz Highway alignment was not carried forward into the Alternatives Analysis.

Any comments you may have on the Nimitz Flyover Project should be directed to the Hawaii Department of Transportation. The State of Hawaii's Highway Modernization Plan dated January 22, 2009, estimates the cost of the Nimitz Viaduct at $600 million for an approximately 2.5-mile elevated highway with two lanes, which equals $240 million per mile.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
Creation Date :	2/2/2009
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Submission Date :	02/02/2009

Submission Content/Notes : 29 December, 2008

To:
Mr. Wayne Yoshioka
Director Department of Transportation Services
City and County of Honolulu
650 South King St. 3rd Floor
Honolulu
HI 96813
FAX: (808) 587-6080

Subject: Comment on Draft Environmental Impact Statement (DEIS) "Honolulu High-capacity transit corridor Project", Issue: Displacement of Homes and Churches should be minimized

Fact:
The DEIS Table 2-6 and Figure 2-20 shows the park and ride facility at Pearl Highlands to be 11 acres and 1600 vehicular parking spaces. The 11 acres "Banana Patch" contain several family homes, farmland and church facilities which have been in existence for 30 to 60 years.

Discussion:
It would be considered an environmental injustice to displace the many families on the 11 acre property because there are better alternatives to the 11 acre Park-and-Ride facility.

Figure 2-42 shows a 43-acre vacant adjacent to the Leeward Community College (LCC site). The DEIS states that this 43 acre LCC site is reserved for potential use for a Vehicle Maintenance and Storage Area (VMSA). Since only one VMSA is needed for the rail project, there are three alternative sites for the VMSA:

1) At the Honolulu Airport east end, some 40 acres could be acquired along Lagoon Drive and Aolele Street to include portions of Keehi Lagoon Park, Airport vacant areas and commercial businesses including Budget Car Rental
2) Portions of the Aloha Stadium Parking lot can be used for the VMSA. Multi-story vehicular parking structures could be built to accommodate the loss in sports events parking.
3) A 41-acre site for VMSA is identified in Kapolei (DEIS figure 2-41).

A further alternative is to reduce the size of the VMSA at the 43-acre LCC site by splitting the VMSA facility between the LCC site and one of the other alternative sites mentioned above.. This area reduction will allow the reservation of 10 to 15 acres for a park and ride facility on the LCC site.

The best alternative is to dedicate the entire vacant 43-acre LCC site for a 23-acre Transit Oriented Development (TOD) and a 20-acre Park-and-ride facility for 3,000 vehicles for rail commuters.

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DEPUTY DIRECTOR

June 11, 2010

RT10/09-336615

Mr. Ben Ramelb
1148 Ala Lilikoi Street
Honolulu, Hawaii 96818

Dear Mr. Ramelb:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal dated December 29, 2008 with subject line [Comment on Draft Environmental Impact Statement (DEIS) "Honolulu High-capacity transit corridor Project", Issue: Displacement of Homes and Churches should be minimized]:

As discussed in Section 4.7.6 of the Final EIS, the City has been coordinating with residents of the Banana Patch community since October 2008. Every household has been visited by City staff, right-of-way staff, and engineering staff to discuss the Project, as well as special needs and relocation assistance for residents who will be displaced. Strategic outreach was conducted for this neighborhood, and it was found the residents were mostly interested in learning more about the right-of-way acquisition process. Residents asked when acquisition might occur, how their property would be appraised, and how soon they might receive compensation. Residents of the community did not object to being relocated to decent, safe, and sanitary housing in compliance with the Federal Uniform Relocation Assistance and Real Property Acquisition Policies Act. Nor was there concern expressed about keeping the community intact for relocation purposes.

Leeward Community College was evaluated as a site for the park-and-ride facility to avoid displacement of families living in the area of the Pearl Highlands Station. This alternative was evaluated in the Draft EIS as an avoidance alternative in Chapter 5. The analysis concluded that this alternative was not feasible. "Under this alternative, the H-2 Freeway access ramp would need to be re-designed from a one-way ramp to a two-way ramp. This would cost approximately $50 million more than the ramps that would serve the Pearl Highlands Station. For this location, the access road for Leeward Community College would also require improvement, which would cost approximately $25 million. In addition, the guideway's crossing of the H-1 Freeway would need to be realigned, costing an additional $5 million."

In addition to the $80 million of roadway and guideway improvements discussed above, it would cost an additional $1 million to acquire right-of-way from the Hawaii Laborers Training Program site Koko Head and makai of the ramp connecting Farrington Highway to Kamehameha Highway, as well as loss of parking for Leeward Community College, which would cost $30 million to replace. These costs would be offset by approximately $20 million since the Pearl Highlands Station would not be constructed under this avoidance alternative.

Your letter suggested three alternative sites for the maintenance and storage facility. As stated in Chapter 2 of the Final EIS, the site near Leeward Community College has been identified as the preferred location for the maintenance and storage facility. Your suggestion for sites along Lagoon Drive and Aloha Stadium cannot be used as both Keehi Lagoon Park and Aloha Stadium are recreational facilities that may not be converted to transportation use per Section 4(f) of the Transportation Act of 1966. In addition, splitting the maintenance and storage functions between multiple sites would make the rail operations less efficient, increase both construction and operating costs, and would require more property acquisitions. Your final suggestion to use a 43-acre site near LCC for park-and-ride and transit-oriented development would be difficult to implement due to poor highway access. Furthermore, this site is a potential location for the maintenance and storage facility.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
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Submission Date :	02/02/2009

Submission Content/Notes : 29 December, 2008

To:
Mr. Wayne Yoshioka
Director Department of Transportation Services
City and County of Honolulu
650 South King St. 3rd Floor
Honolulu
Hi 96813
FAX: (808) 587-6080

Subject: Comment on Draft Environmental Impact Statement (DEIS) "Honolulu High-capacity transit corridor Project", Issue- Project Construction Phasing will not provide early traffic relief

Fact:
The rail project construction phasing is proposed in four phases as discussed on DEIS page 2-38 and as shown on Figure 2-44 as follows:

- East Kapolei to Pearl Highlands (First Construction Phase)
- Pearl Highlands to Aloha Stadium (Second Construction Phase)
- Aloha Stadium to Middle Street (Third Construction Phase)
- Middle Street to Ala Moana Shopping Center (Fourth and final Construction Phase)

Discussion:
The primary purpose of any mass transit system is to provide traffic relief and to provide relief in the near term. The major West and Central Oahu traffic bottlenecks are at the Middle Street merge and at the H-1/H2 merge. Construction phases for the rail should be prioritized to reduce the traffic bottlenecks at these two locations. Therefore, the project construction phasing shown above should be reversed:

- Middle Street to Ala Moana Shopping Center (First Construction Phase)
- Aloha Stadium to Middle Street (Second Construction Phase)
- Pearl Highlands to Aloha Stadium (Third Construction Phase)
- East Kapolei to Pearl Highlands (Fourth Construction Phase)

This revised project phasing is logical because:
a) The Middle Street to Ala Moana Shopping Center first phase will provide early traffic relief to the Middle Street bottle neck.
b) The funding source for the entire 20 mile segment is not guaranteed, recognizing that the General Excise Tax is not meeting projections in revenue due to the expected long term slumping economy. The taxpayer will not tolerate any increase in property tax or GET to fund any rail fund shortfall.
c) The funding amount from the Federal Transit Authority is not guaranteed.
d) If rail funds are delayed, providing traffic relief to the traffic bottlenecks on H-1 will be delayed.

e) Each phase for rail will provide the maximum bang for the dollar. The rail will be completely be useable and serve the most number of commuters as each phase is completed. Conversely, the Kapolei to Pearl Highlands would serve very few commuters as most commuters will be destined for east of Pearl Harbor and beyond in the easterly direction.

Vehicle Maintenance and Storage Facility for each construction phase can be temporarily established to support each construction phase as modified:
a) For the Middle Street phase, some 40 acres could be obtained along Lagoon Drive to include portions of Keehi Lagoon Park, Airport vacant areas and commercial businesses including Used Car Lots. At least 10 acres for park and ride can be acquired in the airport area alongside Aolele Street and Lagoon Drive.
b) For the Aloha Stadium phase, portions of the Aloha Stadium Parking lot can be temporarily used for the Storage Facility and temp facilities for vehicle maintenance.
c) For the Pearl Highlands Phase, a 43-acre vacant site near Leeward Community College is available (DEIS figure 2-42).
d) A 41-acre site is identified for the Kapolei phase (DEIS figure 2-41).

Conclusion:
Construction of the Middle Street to Ala Moana Phase as a first priority is consistent with providing near-term traffic relief, will initially serve the most number of commuters, will be completely useable and cost effective, and will not force the taxpayer to pay more taxes to fund additional rail segments should rail funding sources not achieve revenue projections.

Recommendation:
The DEIS should reverse the construction project phasing as discussed above starting with the Middle Street to Ala Moana Shopping Center as the First Phase.

Respectfully,

Ben Ramelb P.E.
1148 Ala Lilikoi St
Honolulu, HI
96818

Copy to:
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MUFI HANNEMANN
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WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT10/09-336616

Mr. Ben Ramelb
1148 Ala Lilikoi Street
Honolulu, Hawaii 96818

Dear Mr. Ramelb:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Altemative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal dated December 29, 2008 with subject line [Comment on Draft Environmental Impact Statement (DEIS) "Honolulu High-capacity transit corridor Project", Issue-Project Construction Phasing will not provide early traffic relief]:

As described in Section 2.5.10, Project Phasing, of the Final EIS, to support phased opening of the system, the first construction phase must be connected to a maintenance and storage facility, which requires considerable land. The first phase of the Project must be connected to the maintenance and storage facility because, in addition to maintenance of equipment and ongoing operations, this facility houses the main control center for the entire Project. Accordingly, the required testing and operation of the system could not be completed without access to it. No location has been identified closer to Downtown with sufficient available land to construct a maintenance and storage facility. Therefore, construction will begin between East Kapolei and Leeward Community College. The Project will be constructed in phases to accomplish the following:

- *Match the anticipated schedule for right-of-way acquisition and utility relocations*
- *Reduce the time that each area will experience traffic and community disturbances*
- *Allow for multiple construction contracts with smaller contract size to promote more competitive bidding*
- *Match the rate of construction to what can be maintained with local workforce and available financial resources*
- *Balance expenditure of funds to minimize borrowing*

The portion of the corridor in the Ewa direction of Pearl Highlands is less developed than the areas in the Koko Head direction. Right-of-way can be obtained more quickly at the west end of the Project; therefore, overall project construction can begin earlier, resulting in lower total construction costs. Construction is planned to continue uninterrupted in the Koko Head direction from Pearl Highlands to Aloha Stadium, Kalihi, and finally to Ala Moana Center.

The financial plan is balanced for the entire Project so there will not be a situation in which only a portion of the system will be built. If there is a shortfall, additional revenue sources will be considered. Section 6.6 of the Final EIS discusses risks and uncertainties, as well as potential sources to cover shortfalls.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

3221 Ala Ilima St. Apt.6

Nov.25 2008

Mr. Mufi Hannemann
Honolulu Hale
530 S. King Street
Honolulu, HI 96813

Dear Mr. Mufi Hannemann

Hi my name is Jayson and I go to Moanalua High School. I am doing a project for a book called Fahrenheit 451, which asks us to identify an issue and take a public stance on it. I chose the public rail transit issue that we have here in Oahu. Our morning and afternoon traffic is a problem here in Oahu, and with the rail it is said to reduce the amount of traffic.

Even though it was agreed to continue on with the project and build the rail transit, there are many people who opposed this decision. I also disagree with the project of building a rail transit here in Oahu. I agree that the transit system would help alleviate the morning and afternoon traffic we have, and the money saving because of the gas prices, but I am skeptical of the amount of people who will actually ride the rail. It was said that the rail will only improve traffic congestion by 3 percent. That is not a big number. You are an excellent mayor of this state, but I believe you are going to fast into this project. First of all, this project is very costly. In 2006 the price was three billion dollars. Now this year it has rose to five. Five billion dollars is a lot of money to spend; why not spend it on our education? With a tax created to pay off the rail transit, it creates more weight on our shoulders financially especially for people who are in bad situations right now. Oahu is a very small island. The rail would make things much more crowded and the fact that businesses and houses will have to move doesn't sound fair. With a transit system here on Oahu, it would ruin the view of Oahu. It would be less considered a paradise. I believe we should stop this project and look more into it.

Maybe this project will help our traffic problem in the future but I am against transit system here on Oahu. There are many reasons why it's a bad idea but its your decision and I hope you make the right one. Thank you for taking a part of your time to read my letter.

Sincerely,
Jayson Reginaldo

(Moanalua High School Student)

Jayson Reginaldo
3221 Ala Ilima St.
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AR00003088

DEPARTMENT OF TRANSPORTATION SERVICES

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June 11, 2010 RT12/08-292237R

Mr. Jayson Reginaldo
3221 Ala Ilima Street
Apartment 6
Honolulu, Hawaii 96818

Dear Mr. Reginaldo:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

Your preference for not building the Project has been noted; however, the No Build Alternative does not address the Project's needs or meet its purpose as established in Sections 1.7 and 1.8 of the EIS.

Ridership projections for the forecast year of 2030 have been developed using the travel demand model used by the Oahu Metropolitan Planning Organization (OahuMPO), which was calibrated against collected traffic and transit ridership information and then validated against recent counts to be sure it properly represents travel activity in the transportation system (Section 3.2.1 of the Final EIS). An on-board transit survey was completed in December 2005 and January 2006, and the latest socioeconomic information available as of October 2008 was incorporated. Traffic counts were collected in 2005, 2007, and 2008. The model is updated

approximately every five years to reflect changes in land use, socioeconomic conditions, and transportation network improvements. The model is approved by the OahuMPO Technical Advisory Committee. The model is based upon a set of realistic input assumptions regarding land use and demographic changes between now and 2030 and expected transportation levels-of-service on both the highway and public transit system. Based upon the model and these key input assumptions, approximately 116,000 trips per day are expected to use the rapid transit system on an average weekday in 2030. Since the Draft EIS was published, the travel demand model has been refined by adding an updated air passenger model (which forecasts travel in the corridor related to passengers arriving or departing at Honolulu International Airport), defining more realistic drive access modes (driving alone or car pooling) to project stations and recognizing a more robust off-peak non-home-based direct demand element (trips that do not originate at home) based on travel surveys in Honolulu.

Regarding traffic congestion, a travel demand forecasting model was used to forecast traffic conditions at six screenlines during the a.m. and p.m. peak hours. The model showed that in 2030, the Project will reduce congestion up to 11 percent during the a.m. peak hour and up to 10 percent during the p.m. peak hour over the No Build Alternative at selected screenlines, as shown in Tables 3-9 and 3-10 in the Final EIS. In addition, roadway congestion, as measured by vehicle hours of delay, will decrease by 18 percent with the Project in 2030 compared to the No Build Alternative (Table 3-14 in the Final EIS).

Concerning your comment about the cost of the Project, the State Legislature authorized the City and County of Honolulu to enact a 0.5 percent surcharge to the General Excise and Use Tax surcharge for the specific purpose of providing operating and capital costs for a Locally Preferred Alternative for a mass transit project. The revenues from this tax surcharge are not available to the City for another use, such as education.

Lastly, those from whom property is to be acquired will be treated according to the requirements of the Federal Uniform Relocation Assistance and Real Property Acquisition Policies Act. The Act provides for purchase at fair market value and includes relocation assistance to those affected. It also requires that those in need of relocation be placed in comparable quarters. The City and County of Honolulu will continue its efforts to reduce impacts to residents and businesses whenever possible.

The island's unique visual character and scenic beauty were considered in the visual and aesthetic analysis presented in the Draft and Final EISs. As discussed in Section 4.8 of the Final EIS, the Project will be set in an urban context where visual change is expected and differences in scales of structures are typical. The following measures will be included with the Project to minimize negative visual effects and enhance the visual and aesthetic opportunities that it creates:

- *Develop and apply design guidelines that will establish a consistent design framework for the Project with consideration of local context.*
- *Coordinate the project design with the City's transit-oriented development program within the Department of Planning and Permitting.*

- *Consult with the communities surrounding each station for input on station design elements.*

- *Consider specific sites for landscaping and trees during Final Design when plans for new plantings will be prepared by a landscape architect. Landscape and streetscape improvements will mitigate potential visual impacts.*

The Project will provide users, including tourists, with expansive views from several portions of the corridor by elevating riders above highway traffic, street trees, and low structures adjacent to the alignment. In Section 4.8.3 of the Final EIS, specific environmental, architectural, and landscape design criteria are listed that will help minimize visual effects of the Project.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Property Management & Leasing
Pacific Guardian Center - Makai Tower
733 Bishop Street, Suite 1820
Honolulu, HI 96813

tel: (808) 599-5800 fax: (808) 599-5806

Reit Management
& Research LLC
PROPERTY MANAGEMENT
DIVISION

February 6, 2009

VIA REGULAR AND CERTIFIED MAIL, RETURN RECEIPT REQUESTED

Wayne Yoshioka
Director
Department of Transportation Services
City and County of Honolulu
650 S. King St., 3d Floor
Honolulu, Hawaii
96813

Re: Comment on Honolulu Rail Transit Draft Environmental Impact Statement

Dear Mr. Yoshioka:

I am Vice President-Pacific Region, for Reit Management & Research, LLC, the property manager for HRPT Properties Trust ("HRPT"). Through its affiliated companies, HRPT owns the Mapunapuna Industrial Subdivision, including the property bounded by Ahua Street, Nimitz Highway, Puuloa Road, and Pukoloa Street, shown on Figure 2-7 of the Honolulu High-Capacity Transit Corridor Project Draft Environmental Impact Statement ("Draft EIS"). HRPT appreciates the opportunity to comment on the Draft EIS.

HRPT understands that on January 28, 2009, the Honolulu City Council by resolution voted to change the route of the initial segment of the Honolulu rail transit project from the Salt Lake Alternative to the Airport Alternative. HRPT strongly supports the rail transit project, and is not advocating any specific route at this time. Based upon the Draft EIS and the City Council's action, HRPT understands that the City Council in its discretion may in the future add a Salt Lake "spur" to the project or otherwise amend the route to include Salt Lake and Mapunapuna. Should the route be changed to pass through Mapunapuna, HRPT believes a transit station in Mapunapuna would increase system ridership and provide substantial benefits and development opportunities for the surrounding community, businesses and their employees and customers, and the landowners of the property. HRPT therefore respectfully requests that at the appropriate time the City Department of Transportation Services ("DTS") study, place, and construct a transit station in Mapunapuna, if the route is subsequently amended to include a spur or other alignment through Mapunapuna. In that regard, HRPT respectfully requests that DTS consider the following:

1. Technical Feasibility of Transit Station in Mapunapuna—HRPT understands that initially there were some questions as to whether a transit station in Mapunapuna was technically feasible, and that was one of the reasons why a Mapunapuna station was not proposed in the

AR00003092

Draft EIS for the Salt Lake Alternative. To address those questions, HRPT retained URS Corp. ("URS") to analyze the feasibility of a Mapunapuna transit station. URS has been involved in the design and engineering for numerous transit projects around the country, including systems in Portland, Seattle, and San Diego. For their analysis, engineers from URS' Portland office reviewed conceptual engineering level track plans, profile drawings, and background information for the Honolulu project, and communicated with the Honolulu project lead engineer.

Attached as Exhibit 1 please see a December 24, 2008 opinion letter from Bob Post, senior transit engineer and vice president of URS. Mr. Post writes in relevant part:

> Based upon (our) reviews and our own work on similar projects utilizing similar transit technology it is our conclusion that a station could be added to the alignment in the vicinity of Pukoloa and Ahua Streets in the Mapunapuna area. We do not believe making the suggested design changes would result in a negative impact on the project operations or ride quality. Although the addition of a station in this area would add some time to the overall travel time, the impact is lessened in this particular case due to the grades and curves in this segment of the corridor that would already result in reduced speeds.

Based on industry standards, URS concluded that with relatively minor adjustments to the proposed track alignment there are at least three viable options for a transit station in Mapunapuna. As shown on the alignment plans prepared by URS and attached as Exhibit 2, the three potential locations are (1) Option A: Intersection of Pukoloa and Ahua streets, ewa-makai side, flat grade; (2) Option B: Intersection of Pukoloa and Ahua streets, ewa-makai side, 1 percent grade; and (3) Option C: Intersection of Pukoloa and Ahua streets, diamond head-mauka side. Of the three options, Option C is particularly promising, as it is immediately adjacent to a large lot that will become vacant and available in the near future, and would be ideal for transit-oriented development and other amenities to enhance transit ridership.

Option A: Intersection of Pukoloa and Ahua streets, ewa-makai side, flat grade: In this option, the -4% proposed grade for the track profile would be changed to -5%, which URS considers a reasonable grade for a modern transit vehicle. The -5% grade would transition through a 500 foot vertical curve (beginning at station 1117+33) to a 0% grade, and then back to the originally proposed 4% grade on the diamond head side of Moanalua Stream. The modified profile would allow a station platform to be located on the ewa side of the intersection of Pukuloa Street and Ahua Street, on a zero percent grade and horizontal tangent. The top of rail elevation would be about 37 feet above existing ground. Since this option would not modify the horizontal alignment, the general structure footprint would be unchanged except for widening in the station area.

Option B: Intersection of Pukuloa and Ahua streets, ewa-makai side, 1 percent grade: This option would use the same horizontal alignment and station location as Option A, but rather than a flat grade a 1% grade would be introduced, which would match back into the original profile sooner and help shorten the transit station structure. Shortening the structure would likely result in some cost savings. URS does not believe the proposed 1% longitudinal slope would be a problem for construction, operations or passenger loading.

Option C: Intersection of Pukuloa and Ahua streets, diamond head-mauka side: This option could use either of the previous two vertical alignments. The difference would be to reduce the radius of the horizontal curve at Ahua Street to 810 feet, effectively lengthening the

adjacent tangents and enabling a station location approximately 150 to 200 feet further to the east. The elevated transit station would span over Ahua Street and allow access from ground level on both sides of the street, the diamond head side being the existing 7.75-acre "auto auction" lot site. The proposed smaller curve radius would match the original radius proposed at the next curve to the south. Although the smaller radius would slightly lower the potential operating speed through the curve, the presence of a platform would likely be the limiting factor in terms of speed on this section of track in any event.

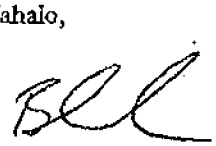
2. Potential Benefits of a Transit Station in Mapunapuna—Today, many employees of Mapunapuna businesses have to park on the street, sometimes blocks away from where they work. Potential customers are discouraged from even coming to Mapunapuna, because of the congestion and lack of parking. Having a transit station in Mapunapuna would provide a convenient and inexpensive way for both employees and customers to get to and from Mapunapuna, and make Mapunapuna a better place to work and do business.

Furthermore, a transit stop in Mapunapuna would draw riders from nearby residential communities in Moanalua, Tripler, and east Salt Lake, who otherwise would not have convenient access to the transit system with the stations proposed in the Draft EIS. The aerial view of Figure 2-7 of the Draft EIS shows the substantial geographical "gap" between the proposed Ala Lilikoi and Middle Street stations on the Salt Lake Alternative, and all of the additional homes that would be served by a Mapunapuna station. Given the thousands of residents in those communities; the approximately 21,000 people who work at approximately 1,100 businesses in or around Mapunapuna; and the hundreds if not thousands of business customers who visit Mapunapuna every day, HRPT believes that a transit station in Mapunapuna would additionally draw at least if not more than the 1,500 or so daily riders projected for the Ala Lilikoi and Middle Street stations on Figure 3-12 of the Draft EIS.

Finally, a transit station in Mapunapuna would provide exciting opportunities for transit oriented development, particularly on the 7.75-acre lot near the corner of Ahua and Pukoloa streets that will become open and available for development in the next few years. Transit oriented development would bring new amenities, services, and vitality to Mapunapuna, benefiting not only existing but also future businesses and residents in the area.

We look forward to the possibility of working with and assisting the City to develop a transit station in Mapunapuna, should the transit route be amended to include a spur or other alignment through Salt Lake and Mapunapuna in the future.

Mahalo,



Brad Leach

URS

December 24, 2008

Mr. Bradford C. Leach
Vice President – Pacific Region
Reit Management & Research LLC
733 Bishop Street, Suite 1820
Honolulu, HI 96813

RE: Station Feasibility In Mapunapuna

Dear Mr. Leach,

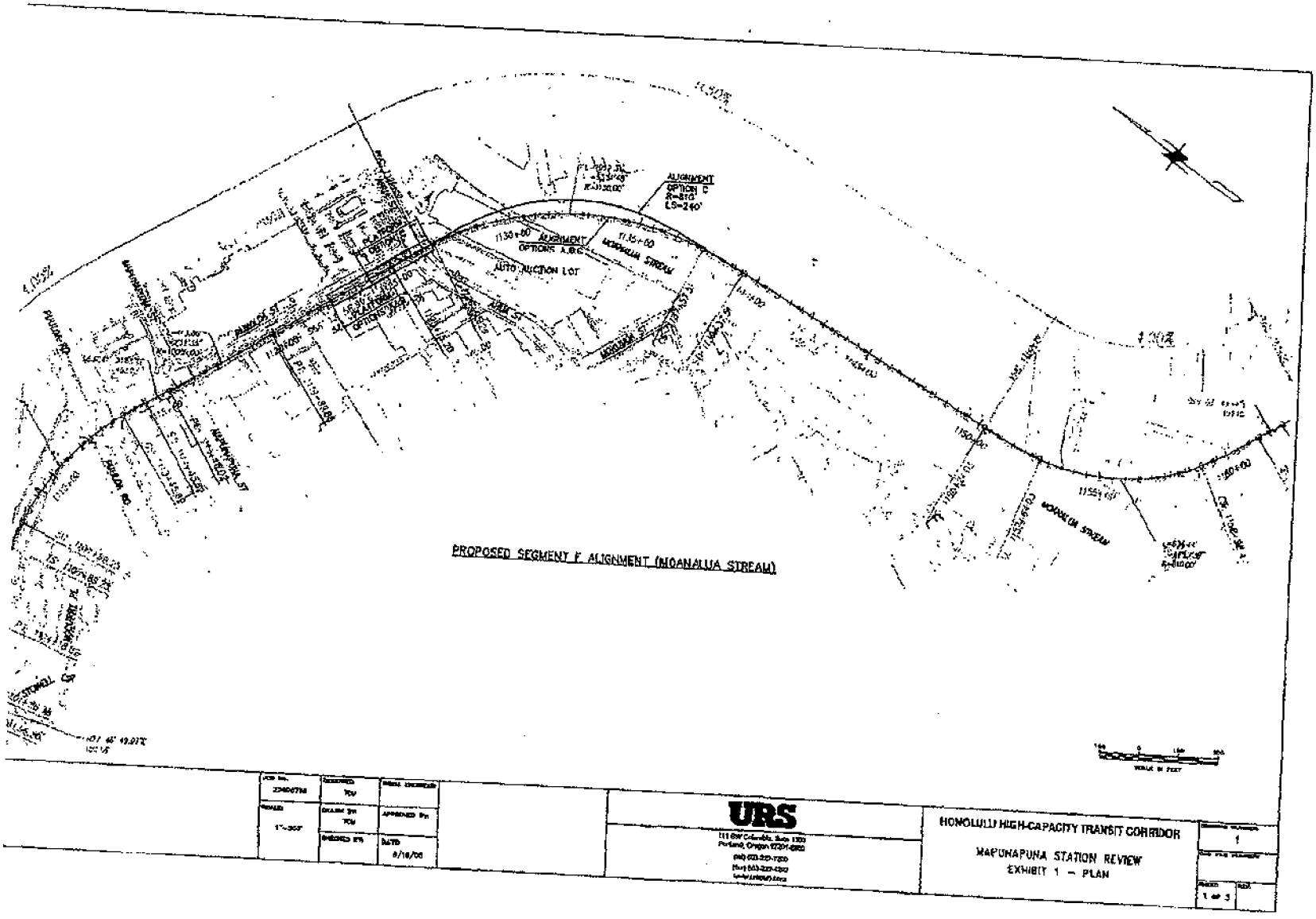
As we have communicated previously, URS has conducted a review of the Honolulu High Capacity Transit Corridor in the Mapunapuna area to determine the technical feasibility of adding a station to the planned Honolulu High-Capacity Transit project. We have reviewed the project design documents provided to us by Reit Management & Research. We have also reviewed the generally accepted industry design standards for horizontal and vertical curves and track grades in station areas for similar projects. Based on the above reviews and our own work on similar projects utilizing similar transit technology it is our conclusion that a station could be added to the alignment in the vicinity of the intersection of Pukoloa and Ahua Streets in the Mapunapuna area. We do not believe making the suggested design changes would result in a negative impact on the project operations or ride quality. Although the addition of a station in this area would add some time to the overall corridor travel time, the impact is lessened in this particular case due to the grades and curves in this segment of the corridor that would already result in reduced operating speeds.

While the drawings previously provided by URS illustrate options that would allow for the addition of a station in the Mapunapuna area and meet generally applied industry standards, we do acknowledge that individual jurisdictions implementing rail transit projects can establish criteria that are more restrictive than the general industry practices.

Sincerely,

Bob Post
Vice President

URS Corporation
111 SW Columbia, Suite 1500
Portland, OR 97201-5850
Tel: 503.222.7200
Fax: 503.222.4292


PROPOSED SEGMENT F ALIGNMENT (MOANALUA STREAM)
ALIGNMENT OPTION C
AUTO AUCTION LOT
MOANALUA STREAM
PALAMA RD
MAPUNAPUNA ST
URS
HONOLULU HIGH-CAPACITY TRANSIT CORRIDOR
MAPUNAPUNA STATION REVIEW
EXHIBIT 1 – PLAN

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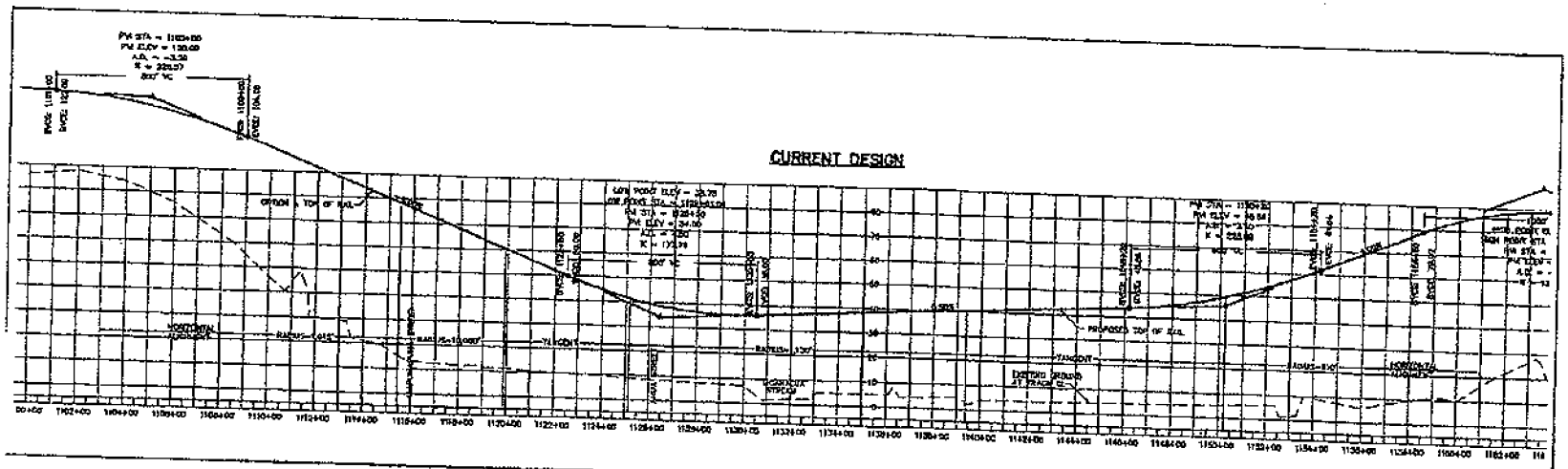

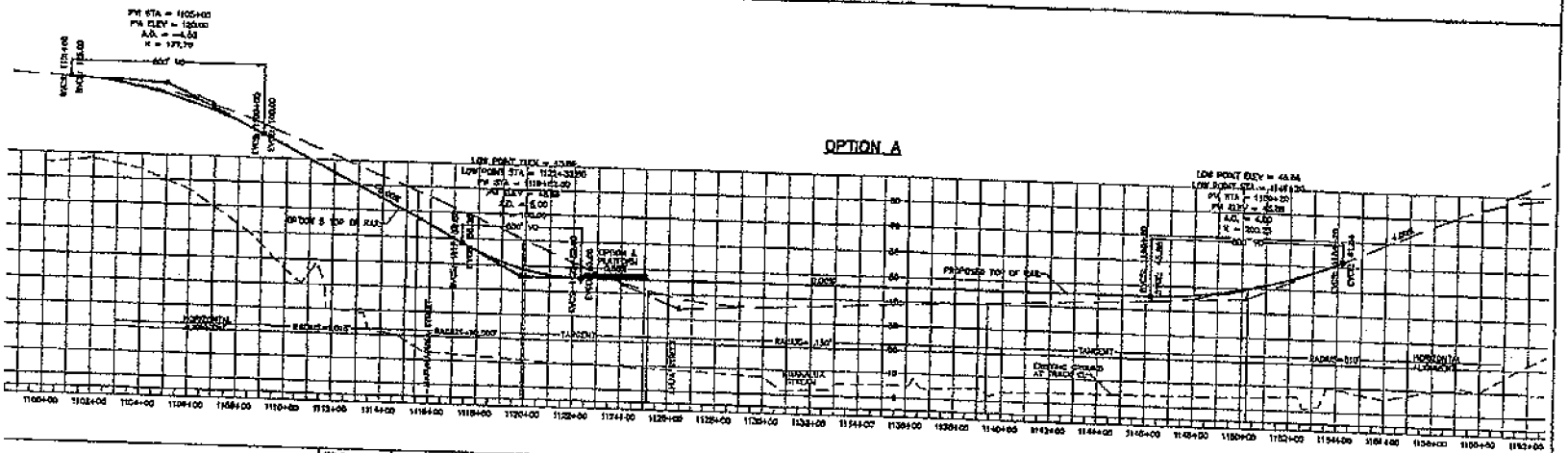

JOB No. 25846705	DESIGNED TCM	FINAL DRAWING	
SCALE H: 1"=400' V: 1"=40'	DRAWN BY TCM	APPROVED BY	
	CHECKED BY PWK	DATE 8/18/08	

URS
111 SW Columbia, Suite 1500
Portland, Oregon 97201-5800
Tel 503-222-7200
(fax) 503-223-4282
www.urscorp.com

HONOLULU HIGH-CAPACITY TRANSIT CORRIDOR

MAPUNAPUNA STATION REVIEW
EXHIBIT 2 – PROFILE A

DRAWING NUMBER 2
SHEET 2 OF 3
REV.

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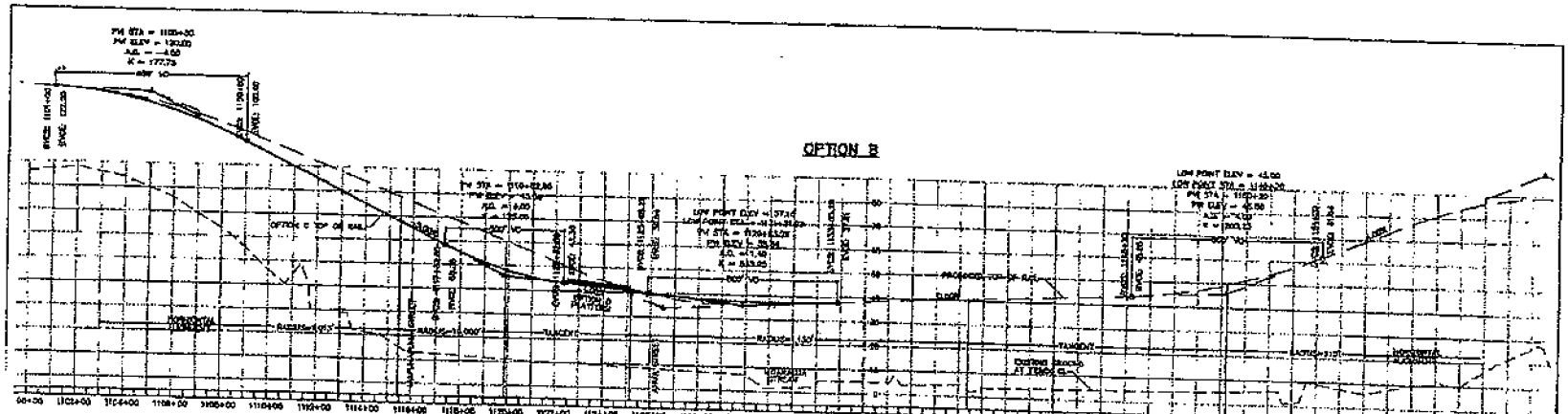

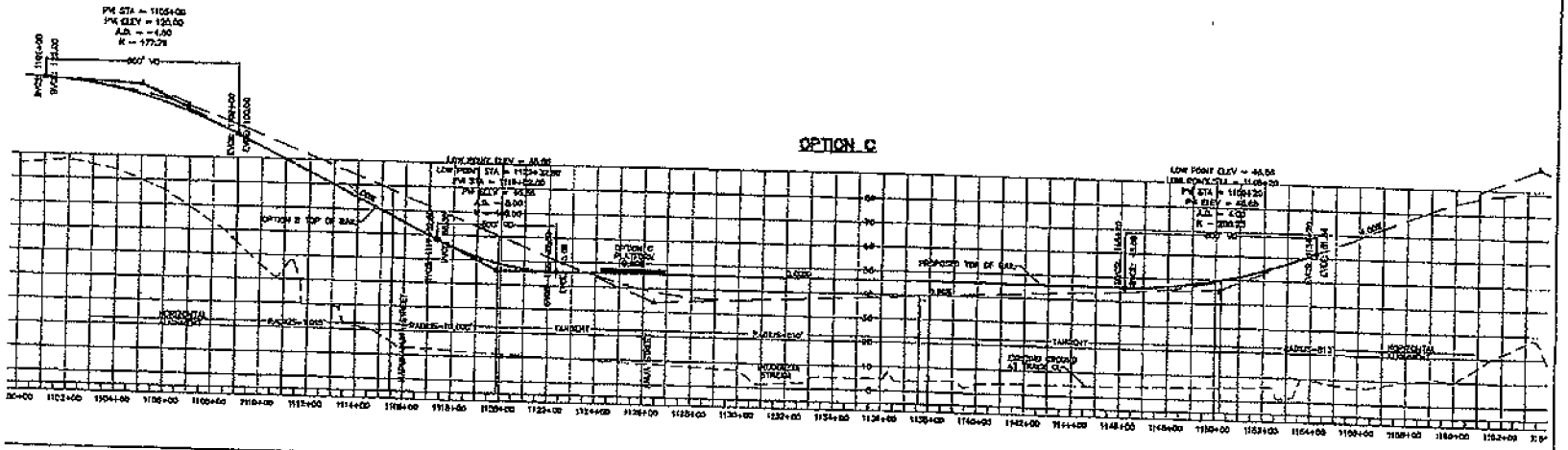

URS

HONOLULU HIGH-CAPACITY TRANSIT CORRIDOR

MAPUNAPUNA STATION REVIEW
EXHIBIT 3 – PROFILE B & C

3

3 of 3

AR00003098

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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HONOLULU, HAWAII 96813
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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT2/09-299172R

Mr. Brad Leach
Reit Management & Research LLC
Pacific Guardian Center – Makai Tower
733 Bishop Street, Suite 1820
Honolulu, Hawaii 96813

Dear Mr. Leach:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraph addresses your comments regarding the above-referenced submittal:

While each of the alternatives discussed in the Draft EIS includes trade-offs between benefits and impacts, the Airport Alternative from East Kapolei to Ala Moana has been selected as the Preferred Alternative as described above. As compared to the alternatives discussed in the Draft EIS, the Airport Alternative will carry the most passengers, provide the greatest transit-user benefits, and result in the fewest vehicle hours of delay. It will provide access to employment centers at Pearl Harbor Naval Base and Honolulu International Airport and will serve the Salt Lake neighborhood with connecting bus service. Of the three Build Alternatives addressed in the Draft EIS, the Airport Alternative will have slightly less impacts to the natural and built environment analyzed in the Draft EIS. During the public comment period on the Draft EIS, the public overwhelmingly supported the Airport Alternative. Of the comments that

specifically supported one of the alternatives, more than 75 percent were in support of the Airport Alternative. For more information this selection is discussed in Section 2.4 of the Final EIS. Since publication of the Draft EIS, design has been advanced, further analysis has been completed, and information has been added in response to comments on the Draft EIS and agency coordination. The Final EIS discusses the process that was used to select the Preferred Alternative, how comments were considered in the decision-making process, impacts and mitigation commitments.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Michael P. Rethman
47-140 Heno Place
Kane'ohe, Hawai'i 96744-5608

December 28, 2008

Mr. Wayne Yoshioka,
Director, Dept. of Transportation Services
City and County of Honolulu
650 South King Street
Honolulu, HI 96813

Aloha Mr. Yoshioka:

RE: Draft Environmental Impact Statement for proposed Oahu train transit system

Please include my comments/questions among those regarding the EIS now underway.

Although I believe that there are a few good reasons to build an elevated rail transit system on Oahu as well as plenty of good economic, cultural and esthetic reasons not to build it, please consider and answer the following questions:

1) What happens when the electricity fails island-wide for 10-20 hours as has happened twice in the past two years? Will hundreds or thousands of folks find themselves trapped on trains? Will there be a police or other quick-response force devoted specifically devoted to the transit system crime or mechanical failures as exist elsewhere? Is this need budgeted?
2) If the system has backup power capabilities, have these been included in the budget and are these facilities part of the EIS?
3) Even with no blackouts, how/where/when will Oahu generate the additional electricity needed to power the trains? (It's my understanding that Oahu already faces problems associated with meeting its peak-load electrical demands.)

Thanks for considering and answering these pertinent questions.

Sincerely,

Michael P. Rethman

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2008 DEC 31 A12:23
DIRECTOR'S OFFICE
CITY & CO. OF
TRANSPORTATION SERVICES

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, 3RD FLOOR
HONOLULU, HAWAII 96813
Phone: (808) 768-8305 • Fax: (808) 768-4730 • Internet: www.honolulu.gov

MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010 RT12/08-293444R

Mr. Michael P. Rethman
47-140 Heno Place
Kaneohe, Hawaii 96744

Dear Mr. Rethman:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

Since trains and rail stations will be electrically powered, the system's infrastructure is being designed to handle service disruptions. For example, trains will draw power from many points along the route, so an outage in a few areas should not disrupt service. If electrical power is lost system-wide, train brakes are designed to stop the rail cars even without power. Lights will stay on in trains and stations; backup batteries will provide lighting for several hours. The train operations center will communicate with passengers via the public address system and intercom and provide guidance.

If power is restored within a short time, service will resume. With a prolonged outage, the operations center will direct passengers to exit the trains and walk along a lighted emergency walkway on the guideway to the nearest station. For those unable to exit rail cars, help will be

provided by emergency responders and transit staff. Passengers will be met at the train station by a coordinated response from emergency responders and city transportation workers.

The system will not have back-up generating capability; however, communications and power systems shall be redundant and shall have sufficient reserve capacity to accommodate the abnormal operating conditions anticipated in the operational contingency plans.

Lastly, the transit system will require approximately 17.9 MW of electrical power to operate the system. This represents one percent of the existing combined electrical generating capacity on Oahu by Hawaiian Electric Company (HECO) and independent power producers. HECO is currently soliciting proposals for non-firm renewable-energy generating capacity up to 100 MW that would commence operation within the 2010 to 2014 timeframe.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Agcaoili, Jennifer

From: Mary Reuter [maryrr@hawaii.edu]
Sent: Wednesday, November 26, 2008 8:29 AM
To: Mayor Mufi Hannemann
Subject: Transportation, Rail and Bike

Dear Mayor Hannemann,

I am a citizen of Moiliili, an elementary school teacher, and a journalism student at UH interested in writing an article about the bike situation here in Honolulu.

I read a quote where you said " The experience of other cities demonstrates that transit systems spur growth, particularly in the areas surrounding the transit stations. We hope that new housing, particularly affordable housing, will spring up along the transit route. We want businesses and leisure activities to be attracted to these hubs. We want to create an environment that supports open space and stimulates walking and bicycling, rather than driving. We want to create neighborhoods where people can live, work, and raise their families."

I support rail, mainly because I born in Washington DC where I used the metro daily. Now that I live in Honolulu, I bike everywhere.

When I read this quote, and that you want to create an environment that supports open spaces and stimulates walking and bicycling rather than driving. As a bicyclist I find it very difficult to navigate outside of the designated bike routes, lanes, and paths. I can get to the University of Hawaii at Manoa from my home with ease (at least once I cross Kapiolani and get on University ave) but I can't go down Kapiolani Boulevard or to Ala Moana with out riding on the sidewalk. I don't even see big strong guys ridinig their bikes on the street down Kapiolani Boulevard.

I read recently about a proposed Bike Share program by Momentum in the Honolulu Advertiser. If a Bike Share program is installed around the TOD areas, will more designated bike routes be established? How do you feel about more designated bike routes, especially in areas such as Kapiolani Boulevard and Waikiki, where currently I can think of only the Ala Wai and the area around the zoo?

Bicycling is certainly among the most sustainable ways to travel, and a fantastic way to enjoy the beautiful weather of our Hawaii.

I would hate to see tourist fatalities increase because they're being hit by cars while riding their bikes. What do you think about this issue?

Concerned Citizen,
Mary Renee Reuter

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, 3RD FLOOR
HONOLULU, HAWAII 96813
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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT1/09-295107R

Ms. Mary Renee Reuter
maryrr@hawaii.edu

Dear Ms. Reuter:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraph addresses your comments regarding the above-referenced submittal:

Your comments have been noted. The Oahu Bike Plan is currently being updated by the City and County of Honolulu, Department of Transportation Services, and is scheduled to be adopted in 2010. The Draft Master Plan includes a prioritized list of bicycle projects developed using criteria that include access to transit. Several projects that would connect existing or future bicycle facilities to rail transit stations are included in the Draft Master Plan. Each fixed guideway station will have facilities for parking bicycles, and trains will be designed to accommodate bicycles. Use of bicycles on trains will be governed by a bicycle policy that has not yet been developed. The Project is coordinating with City and State agencies to encourage development of enhanced bicycle facilities near the stations, but the actual construction of such facilities is beyond the scope of the Project.

The FTA and DTS appreciate your interest in the Project. The Final EIS has been issued in conjunction with the distribution of this letter. You may view the Final EIS on the Project

website at www.honolulutransit.org. You may request a DVD of the Final EIS and additional content through the "Contact Us" tab on the website or by calling the Project hotline at 566-2299. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

-----Original Message-----
From: Ted.Matley@dot.gov [mailto:Ted.Matley@dot.gov]
Sent: Sunday, February 08, 2009 4:14 PM
To: Miyamoto, Faith
Subject: FW: Draft Environmental impact Statement (EIS) for Honolulu HCTP

From: WCOASTJOHN@aol.com [mailto:WCOASTJOHN@aol.com]
Sent: Fri 2/6/2009 5:06 PM
To: wyosioka@honolulu.gov
Cc: Matley, Ted <FTA>
Subject: Draft Environmental impact Statement (EIS) for Honolulu HCTP

The Draft Environment Impact Statement fot the city's rail transit project is unacceptable because it is written soley for a steel wheel on steel rail system.
There are other forms of tixed rail that may be better and more cost-effective than steel wheels. Please rewrite the EIS to cover the other technologies, such as monorail and maglev, to ensure that the city can and will obtain the best and latest technology at the best price. Unlike the continental US States we don't have a rail system to add to we are starting from scratch, so why not try and get the best for the buck?

Very respectfully.
John Ridings

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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May 21, 2010

RT10/09-336313

Mr. John Ridings
wcoastjohn@aol.com

Dear Mr. Ridings:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraph addresses comments regarding the above-referenced submittal:

In parallel with the alignment analysis, a five-member panel appointed by the City Council and the Mayor considered the performance, cost, and reliability of the five proposed technologies for the fixed guideway system. The panel twice accepted public comment as part of the review. By a four-to-one vote, the panel selected steel wheel operating on steel rail as the technology for the Project evaluated in the Final EIS. The four panel members selected steel-wheel technology because it is mature, proven, safe, reliable, economical, and non-proprietary. Proprietary technologies, meaning those technologies that would have required all future purchases of vehicles or equipment to be from a single manufacturer, were eliminated because none of the proprietary technologies offered substantial proven performance, cost, and reliability benefits compared to steel wheel operating on steel rail. Selecting a proprietary technology also would have precluded a competitive bidding process, likely resulting in increased overall project costs.

The FTA and DTS appreciate your interest in the Project. The Final EIS has been issued in conjunction with the distribution of this letter. You may view the Final EIS on the Project website at www.honolulutransit.org. You may request a DVD of the Final EIS and additional content through the "Contact Us" tab on the website or by calling the Project hotline at 566-2299. Issuance of the Record of Decision under NEPA and acceptance of the Final EIS by the Governor of the State of Hawaii are the next anticipated actions and will conclude the environmental review process for this Project.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

RECORD # 525 DETAILS

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Submission Date :	02/06/2009

Submission Content/Notes : COMMENTS ON HONOLULU'S MASS TRANSIT DRAFT EIS
February 6, 2009

The Draft EIS has several glaring deficiencies. Some of them are:
A. Too many stations, many of them amateurishly placed two or less blocks from each other.
B. No public restrooms are shown in the proposed station drawings nor are there any shown cost provisions in the budget section to adequately maintain the necessary public restrooms.
C. Lack of any mention of security provisions and costs at stations.
D. No provision in the stations for a by-pass line for EXPRESS trains.
E. Noise levels of steel wheeled technology in upper floors of towers missing.
F. Noise levels and properties impacted along the Project Corridor in Convention Center, Waikiki and UH areas is missing.
G. Visually sensitive Viewpoints within Project Corridor for Convention Center, Waikiki and UH areas missing or what is shown is totally deceptive and unacceptable.
H. Park and Ride facilities are too small and missing for Ala Moana Area.
I. Diflingham Blvd Project Corridor unworkable as it fails to consider equipment space needed by HECO to maintain very tall HECO Transmission Power lines.
J. EIS fails to consider the possibility of using the large room in the area of the track's support structure-bridge as a revenue producing area to place urban utilities.
K. Locations of Potential Impacts to Ongoing Hazardous Materials Operations missing discussion of Convention Center, Waikiki and UH areas.
L. Historic Properties in areas of Convention Center, Waikiki and UH not covered.
M. Alternative Routings to avoid Historic Properties does not cover areas around Convention Center, Waikiki and UH.

A. TOO MANY STATIONS, MANY OF THEM AMATEURISHLY PLACED FOUR OR LESS BLOCKS FROM EACH OTHER.

The stations are placed too close together. Professionally designed mass transit systems locate their stations 1.5 to 3 to 4 miles apart. For example, the proposed Chinatown and Downtown and Civic Center Stations are all located within 6 blocks, all three of them! This is absurd. One MAJOR Station for this compact area will be more than sufficient (at least initially – until more funds become available for all the un-necessary extra stations. People will walk blocks if they know that they are going to get a fast ride home. This might get some of those very obese people to start walking a short distance everyday and improve their health.

Station construction costs are the highest cost items per unit in the project.

Honolulu needs the entire system built including Waikiki and UH to gain

any relief from gridlock on the freeway, and if the number of stations – initially – are limited to 10 MAJOR Stations, there will be enough in the proposed budget to build the entire line.
Page 2-24 in the Draft EIS discusses the bus system "modifified to coordinate with fixed Guideway System . . . certain local routes would be rerouted . . . as feeder buses to provide frequent and reliable connections to the nearest fixed guideway station."

And, continues on page 2-36, "Enhanced bus service between the Terminal Stations."

Eliminate the 'nice to have' proposed stations and build the 10 'must have' stations, at least initially.

B. No public restrooms shown in the proposed stations nor cost provisions to adequately maintain them.

Draft EIS, page 2-22, Figure 2-11 and Figure 2-12 show platform station configurations with a concourse. No restroom facilities are shown. Restrooms in each station are a must for the numbers of people using this system. There seems to be no consideration in the financial section for the professional maintenance and up keep of these many public restrooms.

C. Lack of any mention of security provisions and costs at stations.

There is no mention of the security needs for each station, nor the costs of maintaining security at each station (another reason to limit the number of stations).

D. No provision in the stations for a by-pass line for EXPRESS trains.

Figures 2-11 and 2-12 show no provision for a center 'by-pass' track for EXPRESS trains.

E. Noise levels of steel wheeled technology in upper floors of towers missing.

There is no discussion on how much the three foot high barriers are going to AMPLIFY the noise of the steel wheels of the trains and reflect this AMPLIFIED noise upwards to thousands of residents in towers the Glideway passes. This is needed.

F. Noise levels and properties impacted along the Project Corridor in Convention Center, Waikiki and UH areas is missing.

Noise levels in the areas of the Convention Center, Waikiki and UH are totally missing. These must be added to the EIS. See Table 4-16 on page 4-100.

G. Visually sensitive Viewpoints within Project Corridor for Convention Center, Waikiki and UH areas missing or what is shown is totally

deceptive and unacceptable.
Visually sensitive Viewpoints within Project Corridor for Convention Center, Waikiki and UH areas missing or what is shown is totally deceptive and unacceptable, see Figure 4-16.

H. Park and Ride facilities are too small and missing for Ala Moana Area.

Park and Ride facilities along the entire proposed Corridor are too small or are missing altogether – Ala Moana, Convention Center, Waikiki, UH area stations.

I. Dillingham Blvd Project Corridor unworkable as it fails to consider equipment space needed by HECO to maintain very tall HECO Transmission Power lines.

On page 4-63, Table 4-10, HECO's high power transmission lines along Dillingham Blvd are mentioned but there is no discussion there or any where else in the Draft EIS on the problem HECO will have servicing those lines as the Projects Guideway is in the way of the mechanical lifts HECO uses to lift workers up to maintain these very tall poles and power lines.

This Table 4-10 also fails to show the potential Visual Effects of View lines at Ala Moana, Convention Center, Waikiki and UH. These areas must be shown too.

J. EIS fails to consider the possibility of using the large room in the area of the track's support structure-bridge as a revenue producing area to place urban utilities.

Page 2-20, Figures 2-11, and 2-12 show cross sections of the proposed Guideway structure and station configurations. Under the top of the guideway's support structure, as shown in the drawings, which top supports the train tracks, is a room - inside the support structure - which room could easily be divided up lengthwise and leased. The leases could be to:

? HECO for High Power Transmission Lines into Waikiki,
? Honolulu Department of Environmental Services for back-up force mains, and also
? phone and
? Cable transmission lines.

These leases would provide extra income to build and maintain the Guideway System.

Putting the community's utilities in the Guideway's support room would save the utilities huge construction costs of digging up our streets for years to put all these new and necessary utilities underground. Those savings could be put into the building costs of the Guideway System.

By doing this the community would greatly benefit by not having our

streets and roads dug up for years to lay all these new under ground utilities.

K. Locations of Potential Impacts to Ongoing Hazardous Materials Operations missing discussion of Convention Center, Waikiki and UH areas.

Figure 4-43 doesn't show any discussion for the Convention Center, Waikiki and UH areas. This must be included.

L. Historic Properties in areas of Convention Center, Waikiki and UH not covered.

These areas must be included in this discussion.

M. Alternative Routings to avoid Historic Properties does not cover areas around Convention Center, Waikiki and UH.

These areas must be included in this discussion in the Draft EIS.

Thank you for your consideration of these important topics and omissions in the proposed Draft EIS for this Project. If you have any questions please call me at 949-2497.

Robert Rodman

Reply Requested : Yes

Submission Type : Draft EIS Comment

FOIA (Freedom of Information Request) Request :

FOIA Referral Date :

FOIA Response Date :

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June 11, 2010 RT9/09-334603

Mr. Robert Rodman
1867 Kaioo Drive, #306
Honolulu, Hawaii 96815

Dear Mr. Rodman:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following addresses your comments regarding the above-referenced submittal:

Our response will address your comments in the same bulleted order as submitted.

A. *Commuter rail stations are typically spaced farther apart. However, most urban systems, such as the one being constructed in Honolulu, have stations that are spaced between ½ mile to 1 mile apart, especially in Downtown areas.*

   1. *The number of stations affects riders in two ways: If stations are too far apart, the system would not be convenient because the distance users must walk would be too long.*

   2. *If stations are too close, the average travel speed is reduced, which also discourages ridership.*

To balance these concerns, the average distance between stations is approximately 1 mile, with shorter distances in dense areas that have greater transit demand—for example, in Downtown Honolulu.

As shown in Table 6-1 in the Final EIS, station costs are comparable to the cost of vehicles and systems, which is substantially less than guideway construction. City Council Resolution 07-039 directed that the first construction project be fiscally constrained by anticipated funding sources and to extend the guideway from East Kapolei to Ala Moana Center. Building only 10 stations could not generate the funding needed to construct the extensions to Waikiki and UH Manoa.

B. *Each station will have a secured public restroom. Patrons will need to ask the station attendant to access the restroom. The cost for maintaining restrooms is included in the operating costs and is based on similar costs from other systems.*

C. As discussed in the Final EIS Section 2.5.4, Safety and Security Measures, a project-specific Safety and Security Management Plan has been developed in accordance with FTA requirements to define the safety and security activities and methods for identifying, evaluating, and resolving potential safety hazards and security vulnerabilities of the system. It establishes responsibility and accountability for safety and security during the Preliminary Engineering, Final Design, construction, testing, and start-up phases of the Project. The Honolulu Police Department, the Honolulu Fire Department, the Honolulu Department of Emergency Management, and the Honolulu Emergency Services Department have been involved in preparing and will be part of implementing the plan. The plan addresses public safety and security concerns, including threats and hazards associated with the Project, specific issues that were identified through community outreach efforts, and design and architectural details to enhance safety.

   In more detail also discussed in Section 2.5.4 of the Final EIS, all stations, park-and-ride facilities, and vehicles will include security cameras that are monitored at all times of operation, will have audible and visual messaging systems, and an intercom link to the system operations center. Security personnel will also patrol the system; however, security personnel may not be physically located at all stations and on all trains at all times. Interior and safety lighting will be provided at all stations and park-and-ride facilities. As shown in Table 2-7 of the Final EIS, the system will operate between 4:00 a.m. and midnight. The Project's operating cost estimate includes the cost of security for stations and park-and-ride facilities. The cost and financial analysis for the Project is provided in Chapter 6 of the Final EIS.

D. *All trains are planned to stop at all stations. There is no plan to implement express service, but if future operations indicate that it would be beneficial, the system could operate in skip-stop service. Such service could decrease travel time by a few minutes. The system will be capable of fully automated operation. However, Figure 3-7 in the Final EIS shows that the fixed guideway system will provide travel-time benefits without express service. This figure represents travel times from origin to destination. Station-to-station travel time is provided in Table 3-16 in the Final EIS. Trains will operate every three minutes in each direction during peak periods. Once*

on the system, it will take 42 minutes to travel from East Kapolei to Ala Moana Center.

E. *As stated in Section 4.10.3 of the Final EIS, the Project will cause no severe noise impacts. Moderate impacts will occur at three areas on the fifth through ninth floors of buildings (as shown in Table 4-18 in the Final EIS). With the recommended mitigation in place, the noise analysis indicates that the new noise generated by the rapid transit system will be lower than existing noise levels in most places.*

The Project includes an integrated noise-blocking parapet wall at the edge of the guideway structure that extends 3 feet above the top of the rail and a system specification for vehicles with wheel skirts. The parapet wall will substantially reduce ground-level noise and will not amplify noise for areas above the guideway. Wheel skirts will increase the benefit from the parapet wall at locations above the elevation of the track. The use of sound-absorptive materials below the tracks in the 3 areas that will experience moderate noise impacts will reduce the Project's noise levels from upper floors to below the impact level.

F. *The noise analysis summarized in Section 4.9 of the Draft EIS and Section 4.10 of the Final EIS presents the results for the East Kapolei to Ala Moana Center segment of the study corridor (i.e., the Project). The Project has logical termini at East Kapolei and Ala Moana Center and independent utility from any extensions that may be constructed in the future. The proposed future extensions to West Kapolei, Salt Lake Boulevard, Waikiki, and UH Manoa are discussed in the cumulative impacts sections of Chapters 3 and 4 of the Final EIS. The future extensions are not part of this Project; thus, they are not required to be evaluated under Chapter 343 of the Hawaii Revised Statutes and NEPA. Under NEPA, environmental analysis is only required when there is a proposed action by a Federal agency. Here, because the future extensions are not proposed for implementation at this time, they are not part of the Project studied in the Final EIS. It would be premature to undertake an environmental analysis of the extensions (beyond the cumulative impacts analysis) because they are not part of the proposed action to be taken by the City and FTA. If the future extensions are proposed for implementation in the future, environmental analysis of the extensions and appropriate alternatives will be undertaken at that time. When the Project is extended to the Convention Center, Waikiki, UH Manoa, and Salt Lake Boulevard, additional noise analyses will be conducted and presented in a separate environmental document.*

G. *The visual and aesthetic analysis presented in Section 4.7 of the Draft EIS and Section 4.8 of the Final EIS covers the Project, which is from East Kapolei to Ala Moana Center. As stated previously, proposed extensions are anticipated to the Convention Center, Waikiki, UH Manoa, and Salt Lake Boulevard; however, they are not presented in the Final EIS. The impacts associated with the future extensions will be analyzed in separate environmental documentation when those extensions are proposed for implementation and funding has been identified.*

The viewpoints analyzed in this Final EIS Section 4.8 are intended to incorporate a variety of perspectives (e.g., vehicular pedestrian, and elevated) and a wide range of views. Visual simulations of the Project were developed to represent the range of

scale and spatial relationships of project elements to other objects. Some of the simulations are also intended to represent view corridors identified as protected resources in pertinent policy documents. The simulations serve several purposes: they were used to evaluate visual and aesthetic consequences of the Project, demonstrate the potential for mitigation, and provide a means of communicating the findings of the analysis. Generally, simulations were prepared for viewpoints where the Project would have a comparatively greater visual effect. A greater emphasis was placed on identifying views and preparing view simulations toward the Project, because this best represents what most viewers would see and the greater variety of views that would be experienced.

H. *As stated in Section 2.5.7 of the Final EIS, park-and-ride lots will be constructed at stations with the highest demand for drive-to-transit access. The Project will include construction of 4,100 parking spaces at four different stations. Sizing and location of parking facilities are based on results of the travel demand forecasting model for the year 2030. Other stations may experience a demand for commuter parking, but factors such as the existing urban environment, space constraints, and roadway network limitations prevent the inclusion of parking at many locations. These factors prevent the construction of a park-and-ride facility at the Ala Moana Center Station and, accordingly, this station will be primarily accessed by other modes, including passenger drop-offs, bus, bicycle, and walking. The Final EIS discusses the impacts and benefits associated with implementing the Project from East Kapolei to Ala Moana Center. The Convention Center, Waikiki, UH Manoa, and Salt Lake Boulevard Stations are part of proposed extensions, and mode of access information will be analyzed as part of future studies.*

I. *As discussed in Section 4.18.2 of the Final EIS, "Communication and coordination have been initiated with the affected utility agencies and companies and will continue throughout design and construction." Further, "Design criteria will govern all new utility construction outside of buildings, as well as the support, maintenance, relocation, and restoration of utilities encountered and affected by construction of the fixed guideway." In addition, "Along several roadway corridors, most existing overhead utilities in conflict with the guideway and safety clearance requirements will be relocated underground. Existing overhead electrical and communication utilities not in conflict with the aerial guideway and safety clearance requirements will remain overhead. Coordination will occur with emergency services and utility companies to ensure that utility relocations meet their needs and that sufficient clearance is provided. The City will evaluate relocation of utilities that are in conflict with the fixed guideway during preliminary design." Again, the Project terminus is Ala Moana Center. Therefore, the Convention Center, Waikiki, UH Manoa, and Salt Lake Boulevard areas are not discussed. The impacts associated with the future extensions will be analyzed in separate environmental documentation when those extensions are proposed for implementation.*

J. *The concept of using the inside of the guideway has been considered. The open portion of the guideway structure contains tensioning cables and is not available for utilities. In addition, future maintenance access for the utilities would require openings in the structure, which would weaken it. The access would either have to*

be provided from below with a lift-truck or require closure of the transit operations from above.

To address your points K, L, and M, as stated above, the Project terminus is Ala Moana Center. Therefore, the Convention Center, Waikiki, UH Manoa, and Salt Lake Boulevard areas are not discussed. The impacts associated with the future extensions will be analyzed in separate environmental documentation when those extensions are proposed for implementation.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
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Submission Date :	02/06/2009

Submission Content/Notes : RE: Draft EIS for Honolulu Transit Corridor Project

Missing in the section about ridership is any data about ridership if Waikiki and UH are included in the initial phase of the project. This data needs to be included so we can compare the various build options. If the number of stations are limited to the top 8 ridership stations with one station at each end with a total of 10 MAJOR stations initially, I think there is enough in the budget to build the entire proposed Glideway System, including Waikiki and UH.

Also missing from the Proposed Draft EIS are alternate Glideway routings for the Convention Center, Waikiki, UH areas.

Historical properties, such as the Ala Wai Canal Kalakaua Avenue Bridge and the Kalakaua Avenue median (with its beautiful line of Mahogany Trees) just Diamond Head of the Ala Wai Canal make the proposed alignment of the Waikiki Glideway unworkable.

The Draft EIS should also show this alternate routing through Waikiki to UH:

WAIKIKI ROUTING ALTERNATIVE ONE
from the Ala Moana Station:
Diamond Head on Kona Street, then Diamond Head across Atkanson St and along the towers, across the Ala Wai Canal, transiting Lapeepee Street and Hobron Lane, over HECO's power station and low-rise, across Ala Moana Blvd., across Fort DeRussy and Kalakaua Avenue and down Kuhio Avenue, across the Beach Walk Pumping Station and down either the two small streets that pass through Waikiki between Kalakaua and Kuhio Avenues (going through building which are built over these streets - via condemnation for the right-of-way), then down Liliuokulani Avenue, across the Ala Wai Canal, across the Golf Course and up University Avenue to UH.

Because there is one line from UH to Waikiki (instead of two ends - one starting at UH and one starting in Waikiki which would cut the start trains to every 12 to 15 minutes), this routing has the advantage of a train leaving the stations at both UH and Waikiki every 6 minutes instead of every 12-15 minutes (people are encouraged to take the train if they don't have to wait and wait at the station avery time they want to use it and UH and Waikiki will be the heavest used stations on the System).

WAIKIKI ROUTING ALTERNATIVE TWO
Another alternative routing through Waikiki could ba from Kona Street, cross Atkinson Street, pass the towers, and turn along the Convention Center side of the Ala Wai Canal and follow it up to Olohana Street, and cross the Ala Wai Canal and pass into Waikiki on wide Olohana, cross Kuhio Avenue, proceed up Duke's Lane to the International Market Place and curve over and pass through the International Market Place and behind the Kaiulani Hotel and on up Prince Edward Street and then turn Maika on Liliuokulani Avenue, cross the Ala Wai Canal, over the Golf Course and up University to the UH.

Please include these alternative routing options in the Draft EIS.

If there are questions please call me at 949-2497. I've lived in Waikiki for 38 years and the traffic gridlock we experience here is tremendous. 20,000 Waikiki workers spend hours every day caught in traffic due to the gridlock and are not able to spend time with their children as a result. Waikiki needs to be on the initial build of this system.

robert rodman

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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June 11, 2010

RT9/09-334795

Mr. Robert Rodman
1867 Kaioo Drive, #306
Honolulu, Hawaii 96815

Dear Mr. Rodman:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

While each of the alternatives discussed in the Draft EIS includes trade-offs between benefits and impacts, the Airport Alternative from East Kapolei to Ala Moana has been selected as the Preferred Alternative as described above. As compared to the alternatives discussed in the Draft EIS, the Airport Alternative will carry the most passengers, provide the greatest transit-user benefits, and result in the fewest vehicle hours of delay. It will provide access to employment centers at Pearl Harbor Naval Base and Honolulu International Airport and will serve the Salt Lake neighborhood with connecting bus service. Of the three Build Alternatives addressed in the Draft EIS, the Airport Alternative will have slightly less impacts to the natural and built environment analyzed in the Draft EIS. During the public comment period on the Draft EIS, the public overwhelmingly supported the Airport Alternative. Of the comments that specifically supported one of the alternatives, more than 75 percent were in support of the Airport Alternative. For more information this selection is discussed in Section 2.4 of the Final EIS. Since publication of the Draft EIS, design has been advanced, further analysis has been completed, and information has been added in response to comments on the Draft EIS and agency coordination. The Final EIS discusses the process that was used to select the Preferred

Alternative, how comments were considered in the decision-making process, impacts and mitigation commitments.

The Project has logical termini and independent utility from any extensions that may be constructed in the future. The future extensions to East Kapolei, Salt Lake Boulevard, Waikiki, and UH Manoa are discussed in the cumulative impacts sections of Chapters 3 and 4 of the Final EIS. However, the future extensions are not part of the Project; thus, they are not required to be evaluated under Chapter 343 of the Hawaii Revised Statutes and NEPA. Under NEPA, environmental analysis is only required when there is a proposed action by a federal agency. Here, because the future extensions are not proposed for implementation at this time, they are not part of the Project studied in the Final EIS. It would be premature to undertake an environmental analysis of the extensions (beyond the cumulative impacts analysis) because they are not part of the proposed action to be taken by the City and FTA. If the future extensions are proposed for implementation at some time in the future, environmental analysis of the extensions and appropriate alternatives will be undertaken at that time. As shown in Table 3-29, ridership would be 28 percent higher with construction of the four extensions compared to the Project (from East Kapolei to Ala Moana Center via the Airport).

The number of stations affects riders in two ways: (1) if stations are too far apart, the system is not convenient because the distance users must walk will be too long; and (2) if stations are too close, the average travel speed is reduced, which also discourages ridership. To balance these concerns, the average distance between stations is approximately 1 mile, with shorter distances in dense areas that have greater transit demand.

City Council Resolution 07-039 directed that the first construction project be fiscally constrained by anticipated funding sources and to extend from East Kapolei to Ala Moana Center. Building only 10 stations could not generate the funding needed to construct the extensions to Waikiki and UH Manoa. Bus service will be enhanced between Ala Moana Center and Waikiki, UH Manoa, and West Kapolei and East Kapolei until the planned extensions are built.

Your ideas for alternative routes through Waikiki have been noted.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
Creation Date :	2/6/2009
Creator Affiliation :	
First Name :	ROBERT
Last Name :	RODMAN
Business/Organization :	
Address :	1867 KAIO'O DR
Alternative Preference :	
Apt./Suite No. :	306
City :	HONOLULU
State :	HI
Zip Code :	96815
Email :	RODMANHI@JUNO.COM
Telephone :	949-2497
Telephone Extension :	
Add to Mailing List :	Both
Submission Method :	Website
Other Submission Method :	
Submission Date :	02/06/2009
Submission Content/Notes :	The number of stations should be cut to the bare minimum because they will become another abode of the homeless mentally ill which now inhabit our bus stops. Daily we see such individuals who sit on the bus stop benches while a stream of urine runs down to the concrete under them while they sit above. These same individuals - who - it is easy for anyone to see - live in the same garments for months or years, are seen sitting on the cloth seats on the buses we ride (which cloth seats obviously have never been wet washed since the buses were delivered new to the city). With this in mind, I can find no mention of scrubable seats planned for the trains in this system in the EIS. Further, I can find no mention of any plans to keep the station concourses and platforms described starting on page 2-20 and shown in Figures 2-11 & 2-12 clear of homeless campers, or businesses and portable travel desks and chairs which daily now are allowed to block Waikiki's sidewalks near the Market Place. These issues need to be addressed in the Draft EIS for this Transit Project.

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-334807

Mr. Robert Rodman
1867 Kaioo Drive, #306
Honolulu, Hawaii 96815

Dear Mr. Rodman:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

The number of stations affects riders in two ways: (1) if stations are too far apart, the system is not convenient because the distance users must walk will be too long; and (2) if stations are too close, the average travel speed is reduced, which also discourages ridership. To balance these concerns, the average distance between stations is approximately 1 mile, with shorter distances in dense areas that have greater transit demand.

Your comment regarding the homeless is noted. At this time in project planning, the seat covers have not been selected. Selection of seat covers will consider all variables and associated costs. In addition, stations will be patrolled and will be closed at night. Security will be provided in all stations and on all trains; however, security personnel may not be physically located in all locations at all times.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
Creation Date :	12/13/2008
Creator Affiliation :	
First Name :	Nancy and Errol
Last Name :	Rubin
Business/Organization :	
Address :	594 Ailhi Place
Alternative Preference :	
Apt./Suite No. :	
City :	Kailua
State :	HI
Zip Code :	96734
Email :	nsrubin@aloha.net
Telephone :	
Telephone Extension :	
Add to Mailing List :	None
Submission Method :	Website
Other Submission Method :	
Submission Date :	12/13/2008
Submission Content/Notes :	Dear Friends, We are very much in favor of adding the airport connection immediately and to start phase one of building from Pearl City to Honolulu proper. Thank you for receiving our imput. Much aloha, Nancy and Errol Rubin

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, 3RD FLOOR
HONOLULU, HAWAII 96813
Phone: (808) 768-8305 • Fax: (808) 768-4730 • Internet: www.honolulu.gov

MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-331953

Ms. Nancy Rubin
Mr. Errol Rubin
594 Alihi Place
Kailua, Hawaii 96734

Dear Ms. Rubin and Mr. Rubin:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall indentify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

Your preference for the Airport Alternative has been noted. While each of the alternatives discussed in the Draft EIS includes trade-offs between benefits and impacts, the Airport Alternative from East Kapolei to Ala Moana has been selected as the Preferred Alternative as described above. During the public comment period on the Draft EIS, the public overwhelmingly supported the Airport Alternative. Of the comments that specifically supported one of the alternatives, more than 75 percent were in support of the Airport Alternative. For more information this selection is discussed in Section 2.4 of the Final EIS. .

As described in Section 2.5.10, Project Phasing, and further in Section 8.6.9, Construction Phasing, in the Final EIS, to support phased opening, the first construction phase must be connected to a maintenance and storage facility, which requires considerable space. No location has been identified closer to Downtown with sufficient available space to construct a maintenance and storage facility. Therefore, construction will begin between East Kapolei and

Leeward Community College. The Project will be constructed in phases to accomplish the following:

- *Match the anticipated schedule for right-of-way acquisition and utility relocations.*
- *Reduce the time that each area will experience traffic and community disturbances.*
- *Allow for multiple construction contracts with smaller contract size to promote more competitive bidding.*
- *Match the rate of construction to what can be maintained with local workforce and available financial resources.*
- *Balance expenditure of funds to minimize borrowing.*

The portion of the corridor in the Ewa direction of Pearl Highlands is less developed than the areas in the Koko Head direction. Right-of-way can be obtained more quickly at the west end of the Project; therefore, overall project construction can begin earlier, resulting in lower total construction costs. Construction is planned to continue uninterrupted in the Koko Head direction from Pearl Highlands to Aloha Stadium, Kalihi, and finally to Ala Moana Center.

As portions of the Project are completed, each will be opened incrementally so that system benefits, even if limited during the initial phases, will be realized prior to completion of construction of the entire Project.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
Creation Date :	12/27/2008
Creator Affiliation :	
First Name :	Bill
Last Name :	Russell
Business/Organization :	Retired, U.S. Secret Service, Wash., D.C.
Address :	94-309 Puuwepa Placem
Alternative Preference :	
Apt./Suite No. :	
City :	Mililani
State :	HI
Zip Code :	96789
Email :	foxiejrt1@aol.com
Telephone :	625-5358
Telephone Extension :	
Add to Mailing List :	Email
Submission Method :	Website
Other Submission Method :	
Submission Date :	12/27/2008

Submission Content/Notes : I don't think the rail system will be widely used, because it will take us too long to get to get where we want to go, and because of the problems with graffiti and vehicle break-ins at the stations.

Time:

If we have to take a bus to get to a station, then take another bus when we get off the train, and the train will make 19 or 21 stops in 20 miles, all that will consume too much time.

Break-ins at the stations:

Oahu is famous for vehicle break-ins and grafitti. Costly security measures will be needed at each of the 19 or 21 stations and on each train.

The total cost for building and maintaining and providing for security for rail is way too much for the benefits gained.

I watched the debates.

Prof. Prevadouros was right. There are other mass transit systems which are better, less costly, and will get us where we want to go faster, than rail.

Mahalo

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-332262

Mr. Bill Russell
94-309 Puuwepa Place
Mililani, Hawaii 96789

Dear Mr. Russell:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

Your concerns about the Project have been noted. As discussed in Chapter 3 of the Final EIS, travel time by rail, including transfers to bus, will be the same as today or less. Under current conditions, travel times via bus or car can vary considerably due to traffic congestion and unpredictability. Future travel times with rail will be highly reliable, in large part because the guideway will be completely separated from roads and highways. Because of the high frequency of the fixed guideway service (every three minutes during peak periods and every six minutes during mid-day periods), riders transferring from buses to the fixed guideway will experience minimal wait times. Riders transferring from the guideway service to buses will also benefit from improved frequencies on existing bus routes serving stations. In addition, several new routes with high frequencies will be provided as feeders to the guideway system. Since these routes will primarily operate in residential areas, they will provide greater reliability versus routes operating along congested arterials. Figure 3-7 in the Final EIS shows that transit travel

times with the Project will be significantly better than travel times without the Project. Travel times are shown from origin to destination and include transfers.

Security, as discussed in the Final EIS Section 2.5.4, Safety and Security Measures, a project-specific Safety and Security Management Plan has been developed in accordance with FTA requirements to define the safety and security activities and methods for identifying, evaluating, and resolving potential safety hazards and security vulnerabilities of the system. It establishes responsibility and accountability for safety and security during the Preliminary Engineering, Final Design, construction, testing, and start-up phases of the Project. The Honolulu Police Department, the Honolulu Fire Department, the Honolulu Department of Emergency Management, and the Honolulu Emergency Services Department have been involved in preparing and will be part of implementing the plan. The plan addresses public safety and security concerns, including threats and hazards associated with the Project, specific issues that were identified through community outreach efforts, and design and architectural details to enhance safety.

Security will be provided during all operating hours. Also discussed in Section 2.5.4 of the Final EIS, all stations, park-and-ride facilities, and vehicles will include security cameras that are monitored at all times of operation, will have audible and visual messaging systems, and an intercom link to the system operations center. Security personnel will also patrol the system; however, security personnel may not be physically located at all stations and on all trains at all times. Interior and safety lighting will be provided at all stations and park-and-ride facilities. As shown in Table 2-7 of the Final EIS, the system will operate between 4:00 a.m. and midnight. The Project's operating cost estimate includes the cost of security for stations and park-and-ride facilities. You can find the cost and financial analysis for the Project in Chapter 6 of the Final EIS.

Lastly, Chapter 2 of the Final EIS summarizes the alternatives screening and selection process. Beginning in the fall of 2005, an initial screening process considered alternatives identified through previous transit studies, a field review of the study corridor, an analysis of current population and employment data for the study corridor, a literature review of technology modes, ongoing work completed as part of the Oahu Regional Transportation Plan 2030 (ORTP) prepared by the Oahu Metropolitan Planning Organization (OahuMPO) (OahuMPO 2007), and public and agency comments received during the formal Alternatives Analysis scoping process.

The screening process is documented in the Honolulu High-Capacity Transit Corridor Project Alternatives Screening Memorandum (DTS 2006a). Three scoping meetings were held during the screening process in December 2005, which included a presentation of initial alternatives to the public, interested agencies, and officials to receive comments on the Purpose and Need, alternatives, and scope of the Alternatives Analysis. Refinements were made to the alternatives based on the public input during scoping.

After completion of screening in the winter of 2006, the following alternatives were studied in the Alternatives Analysis: No Build Alternative, Transportation System Management (TSM) Alternative, Managed Lane Alternative, and the Fixed Guideway Alternative. After review of the Alternatives Analysis Report and consideration of public comments, the City Council identified a fixed guideway transit system extending from Kapolei to UH Manoa with a

connection to Waikiki as the Locally Preferred Alternative. This identification, which eliminated the TSM and Managed Lane Alternatives from further consideration, became Ordinance 07-001 on January 6, 2007. The NEPA process considered a range of alternatives that was consistent with the identified Locally Preferred Alternative. As discussed in Section 2.2, there were no alternatives that had not been previously studied and eliminated for good cause that would satisfy the Purpose and Need at less cost, with greater effectiveness, or less environmental or community impact.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
Creation Date :	2/2/2009
Creator Affiliation :	
First Name :	Carolynn
Last Name :	Ruth
Business/Organization :	Public Storage
Address :	701 Western Avenue
Alternative Preference :	
Apt./Suite No. :	
City :	Glendale
State :	CA
Zip Code :	91201
Email :	cruth@publicstorage.com
Telephone :	
Telephone Extension :	
Add to Mailing List :	None
Submission Method :	Website
Other Submission Method :	
Submission Date :	02/02/2009
Submission Content/Notes :	Public Storage owns the property at 989 Kamehameha Hwy in Pearl City (the Property). It is Public Storage's understanding, as of February 2, 2009, that no portion of the Property at will be acquired for this project. Provided no portion of the Property is taking and the project improvements do not negatively affect the Property, Public Storage has no objections to a project that will improve traffic flow in the area. Negative impacts would include, but are not limited to, over-steepening of the Property's driveway slope, interference with proper drainage from the Property, decreasing turning radii such that truck access is restricted or difficult, or impeding visibility of the Property. Carolynn Ruth Real Estate Paralegal Public Storage 701 Western Avenue Glendale, CA 91201-2349 Tel: 818.244.8080 x1410 Fax: 818.543.7341 Email: cruth@publicstorage.com

DEPARTMENT OF TRANSPORTATION SERVICES

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-334415

Ms. Carolynn Ruth
701 Western Avenue
Glendale, California 91201

Dear Ms. Ruth:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraph addresses your comments regarding the above-referenced submittal:

Public Storage is currently listed as a partial take as a result of widening of the highway in this location. Project coordination with Public Storage will be ongoing. Access constraints will be evaluated by the design team during Final Design.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
Creation Date :	1/26/2009
Creator Affiliation :	
First Name :	Gerald
Last Name :	Sakamura
Business/Organization :	resident
Address :	99-844 Hulumanu St.
Alternative Preference :	
Apt./Suite No. :	
City :	Aiea
State :	HI
Zip Code :	96701
Email :	sakinancy@hawaii.rr.com
Telephone :	488-9569
Telephone Extension :	
Add to Mailing List :	Both
Submission Method :	Website
Other Submission Method :	
Submission Date :	01/26/2009
Submission Content/Notes :	I think that the most benefit we can achieve would be to start from downtown out to the Airport and beyond Pearlridge and UH west. If there comes a time where cost might stop or long delay the project, we could use whatever is made and start service from wherever the project is stalled. It would be the optimum way to gain usage of whatever is already made, whatever the delayed portion would be. And at the same time, be an example of what the completion would be like. Thank you for the opportunity to input my opinion.

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010 RT9/09-334300

Mr. Gerald Sakamura
99-844 Hulumanu Street
Aiea, Hawaii 96701

Dear Mr. Sakamura:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraph addresses your comments regarding the above-referenced submittal:

As described in Section 2.5.10, Project Phasing, and further in Section 8.6.9, Construction Phasing, in the Final EIS, to support phased opening, the first construction phase must be connected to a maintenance and storage facility, which requires considerable space. No location has been identified closer to Downtown with sufficient available space to construct a maintenance and storage facility. Therefore, construction will begin between East Kapolei and Leeward Community College. The Project will be constructed in phases to accomplish the following:

- *Match the anticipated schedule for right-of-way acquisition and utility relocations.*
- *Reduce the time that each area will experience traffic and community disturbances.*

- *Allow for multiple construction contracts with smaller contract size to promote more competitive bidding.*

- *Match the rate of construction to what can be maintained with local workforce and available financial resources.*

- *Balance expenditure of funds to minimize borrowing.*

The portion of the corridor in the Ewa direction of Pearl Highlands is less developed than the areas in the Koko Head direction. Right-of-way can be obtained more quickly at the west end of the Project; therefore, overall project construction can begin earlier, resulting in lower total construction costs. Construction is planned to continue uninterrupted in the Koko Head direction from Pearl Highlands to Aloha Stadium, Kalihi, and finally to Ala Moana Center.

As portions of the Project are completed, each will be opened incrementally so that system benefits, even if limited during the initial phases, will be realized prior to completion of construction of the entire Project.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
Creation Date :	1/13/2009
Creator Affiliation :	
First Name :	stanley
Last Name :	sakuma
Business/Organization :	
Address :	45-757 Hilinai St.
Alternative Preference :	
Apt./Suite No. :	
City :	Kaneohe
State :	HI
Zip Code :	96744
Email :	s.sakuma@hawaiiantel.net
Telephone :	
Telephone Extension :	
Add to Mailing List :	Both
Submission Method :	Website
Other Submission Method :	
Submission Date :	01/13/2009
Submission Content/Notes :	I understand taxes will increase. By what amount?

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-333692

Mr. Stanley Sakuma
45-757 Hilinai Street
Kaneohe, Hawaii 96744

Dear Mr. Sakuma:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraph addresses your comments regarding the above-referenced submittal:

Chapter 6 of the Final EIS discusses funding sources for the capital costs and the ongoing operating and maintenance costs of the alternatives. City funding for the capital cost of implementing the Project is expected to come from the 0.5 percent County General Excise and Use Tax Surcharge. This surcharge has been in place since January 1, 2007, and will expire December 31, 2022. City subsidy for transit operating and maintenance costs comes from the General Fund and Highway Fund, which receive revenue from a variety of currently existing taxes. Whether any of these taxes will be raised at some time in the future will be decided as part of the City's annual budget process.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this

letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
Record Date :	11/12/2008
First Name :	Keith
Last Name :	Sasaki
Business/Organization :	Dependable Hawaiian Express
Address :	1130 N.Nimitz Highway
Apt./Suite No. :	C-105
City :	Honolulu
State :	HI
Zip Code :	96817
Email :	keith.sasaki@dhx.com
Telephone :	387-0040
Telephone Extension :	
Add to Mailing List :	Both
Submission Method :	Website
Submission Content/Notes :	I would like like to know if you have already decided on how to bring in the necessary freight to build this project. I work for a major freight forwarder and would be interested in assisting in this venture. Keith Sasaki

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, 3RD FLOOR
HONOLULU, HAWAII 96813
Phone: (808) 768-8305 • Fax: (808) 768-4730 • Internet: www.honolulu.gov

MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-330432

Mr. Keith Sasaki
1130 North Nimitz Highway, C-105
Honolulu, Hawaii 96817

Dear Mr. Sasaki:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraph addresses your comments regarding the above-referenced submittal:

The selected construction contractors will be responsible for supplying materials to the Project worksite. These contractors have not been decided upon at this time.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
Creation Date :	1/7/2009
Creator Affiliation :	
First Name :	Andrew
Last Name :	Sataraka
Business/Organization :	Good Samaritan Church
Address :	99-545 Opukea St.
Alternative Preference :	
Apt./Suite No. :	
City :	Aiea
State :	HI
Zip Code :	96701
Email :	
Telephone :	356-8405
Telephone Extension :	
Add to Mailing List :	Standard
Submission Method :	Website
Other Submission Method :	
Submission Date :	01/07/2009
Submission Content/Notes :	The plan for a Rail Transit is the best thing will ever happen to Oahu

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, 3RD FLOOR
HONOLULU, HAWAII 96813
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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-333006

Mr. Andrew Sataraka
99-545 Opukea Street
Aiea, Hawaii 96701

Dear Mr. Sataraka:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraph addresses your comments regarding the above-referenced submittal:

Your preference for a Fixed Guideway Transit Alternative has been noted. While each of the alternatives discussed in the Draft EIS includes trade-offs between benefits and impacts, the Airport Alternative from East Kapolei to Ala Moana has been selected as the Preferred Alternative as described above. As compared to the alternatives discussed in the Draft EIS, the Airport Alternative will carry the most passengers, provide the greatest transit-user benefits, and result in the fewest vehicle hours of delay. It will provide access to employment centers at Pearl Harbor Naval Base and Honolulu International Airport and will serve the Salt Lake neighborhood with connecting bus service. Of the three Build Alternatives addressed in the Draft EIS, the Airport Alternative will have slightly less impacts to the natural and built environment analyzed in the Draft EIS. During the public comment period on the Draft EIS, the public overwhelmingly supported the Airport Alternative. Of the comments that specifically supported one of the alternatives, more than 75 percent were in support of the Airport Alternative. For more

information this selection is discussed in Section 2.4 of the Final EIS. Since publication of the Draft EIS, design has been advanced, further analysis has been completed, and information has been added in response to comments on the Draft EIS and agency coordination. The Final EIS discusses the process that was used to select the Preferred Alternative, how comments were considered in the decision-making process, impacts and mitigation commitments.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
Creation Date :	1/7/2009
Creator Affiliation :	
First Name :	Elizabeth
Last Name :	Sataraka
Business/Organization :	Good Samaritan
Address :	99-545 Opukea St.
Alternative Preference :	
Apt./Suite No. :	
City :	Aiea
State :	HI
Zip Code :	96701
Email :	liz@hawaiifoodbank.org
Telephone :	808-561-5695
Telephone Extension :	
Add to Mailing List :	Both
Submission Method :	Website
Other Submission Method :	
Submission Date :	01/07/2009
Submission Content/Notes :	This is a great idea that the Rail Transit is planned to be build. Honolulu needs it now

---

Status :	Initial Action Needed
Creation Date :	1/7/2009
Creator Affiliation :	
First Name :	Epaferoti
Last Name :	Sataraka
Business/Organization :	Good Samaritan Church
Address :	P.O Box 31029
Alternative Preference :	
Apt./Suite No. :	
City :	Honolulu
State :	HI
Zip Code :	96820
Email :	
Telephone :	
Telephone Extension :	
Add to Mailing List :	Standard
Submission Method :	Website
Other Submission Method :	
Submission Date :	01/07/2009
Submission Content/Notes :	Rail Transit is the way to go. Our people need to save time and money from sitting in traffic end buying gas sitting in traffic

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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HONOLULU, HAWAII 96813
Phone: (808) 768-8305 • Fax: (808) 768-4730 • Internet: www.honolulu.gov

MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-333558

Epaferoti Sataraka
P.O. Box 31029
Honolulu, Hawaii 96820

Dear Epaferoti Sataraka:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraph addresses your comments regarding the above-referenced submittal:

Your preference for a Fixed Guideway Transit Alternative has been noted. While each of the alternatives discussed in the Draft EIS includes trade-offs between benefits and impacts, the Airport Alternative from East Kapolei to Ala Moana has been selected as the Preferred Alternative as described above. As compared to the alternatives discussed in the Draft EIS, the Airport Alternative will carry the most passengers, provide the greatest transit-user benefits, and result in the fewest vehicle hours of delay. It will provide access to employment centers at Pearl Harbor Naval Base and Honolulu International Airport and will serve the Salt Lake neighborhood with connecting bus service. Of the three Build Alternatives addressed in the Draft EIS, the Airport Alternative will have slightly less impacts to the natural and built environment analyzed in the Draft EIS. During the public comment period on the Draft EIS, the public overwhelmingly supported the Airport Alternative. Of the comments that specifically supported one of the alternatives, more than 75 percent were in support of the Airport Alternative. For more

information this selection is discussed in Section 2.4 of the Final EIS. Since publication of the Draft EIS, design has been advanced, further analysis has been completed, and information has been added in response to comments on the Draft EIS and agency coordination. The Final EIS discusses the process that was used to select the Preferred Alternative, how comments were considered in the decision-making process, impacts and mitigation commitments.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
Creation Date :	1/7/2009
Creator Affiliation :	
First Name :	Isakara
Last Name :	Sataraka
Business/Organization :	Good Samaritan Church
Address :	94-027 Waipahu Depot St
Alternative Preference :	
Apt./Suite No. :	
City :	Waipahu
State :	HI
Zip Code :	96797
Email :	satarakafamily@yahoo.com
Telephone :	808-781-6760
Telephone Extension :	
Add to Mailing List :	Both
Submission Method :	Website
Other Submission Method :	
Submission Date :	01/07/2009
Submission Content/Notes :	I believe our city definitely need the Rail Transit now and for the future.

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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HONOLULU, HAWAII 96813
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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-332975

Mr. Isakara Sataraka
94-027 Waipahu Depot Street
Waipahu, Hawaii 96797

Dear Mr. Sataraka:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraph addresses your comments regarding the above-referenced submittal:

Your preference for a Fixed Guideway Transit Alternative has been noted. While each of the alternatives discussed in the Draft EIS includes trade-offs between benefits and impacts, the Airport Alternative from East Kapolei to Ala Moana has been selected as the Preferred Alternative as described above. As compared to the alternatives discussed in the Draft EIS, the Airport Alternative will carry the most passengers, provide the greatest transit-user benefits, and result in the fewest vehicle hours of delay. It will provide access to employment centers at Pearl Harbor Naval Base and Honolulu International Airport and will serve the Salt Lake neighborhood with connecting bus service. Of the three Build Alternatives addressed in the Draft EIS, the Airport Alternative will have slightly less impacts to the natural and built environment analyzed in the Draft EIS. During the public comment period on the Draft EIS, the public overwhelmingly supported the Airport Alternative. Of the comments that specifically supported one of the alternatives, more than 75 percent were in support of the Airport Alternative. For more

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The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
Creation Date :	1/7/2009
Creator Affiliation :	
First Name :	Isakara Nathan
Last Name :	Sataraka
Business/Organization :	
Address :	99-545 Opukea St.
Alternative Preference :	
Apt./Suite No. :	
City :	Aiea
State :	HI
Zip Code :	96701
Email :	n_sataraka@Yahoo.com
Telephone :	693-6463
Telephone Extension :	
Add to Mailing List :	Both
Submission Method :	Website
Other Submission Method :	
Submission Date :	01/07/2009
Submission Content/Notes :	Please build the Rail now

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, 3RD FLOOR
HONOLULU, HAWAII 96813
Phone: (808) 768-8305 • Fax: (808) 768-4730 • Internet: www.honolulu.gov

MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-332988

Mr. Isakara Nathan Sataraka
99-545 Opukea Street
Aiea, Hawaii 96701

Dear Mr. Sataraka:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraph addresses your comments regarding the above-referenced submittal:

Your preference for a Fixed Guideway Transit Alternative has been noted. While each of the alternatives discussed in the Draft EIS includes trade-offs between benefits and impacts, the Airport Alternative from East Kapolei to Ala Moana has been selected as the Preferred Alternative as described above. As compared to the alternatives discussed in the Draft EIS, the Airport Alternative will carry the most passengers, provide the greatest transit-user benefits, and result in the fewest vehicle hours of delay. It will provide access to employment centers at Pearl Harbor Naval Base and Honolulu International Airport and will serve the Salt Lake neighborhood with connecting bus service. Of the three Build Alternatives addressed in the Draft EIS, the Airport Alternative will have slightly less impacts to the natural and built environment analyzed in the Draft EIS. During the public comment period on the Draft EIS, the public overwhelmingly supported the Airport Alternative. Of the comments that specifically supported one of the alternatives, more than 75 percent were in support of the Airport Alternative. For more

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Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
Creation Date :	1/7/2009
Creator Affiliation :	
First Name :	Kaiserlyn
Last Name :	Sataraka
Business/Organization :	
Address :	99-545 Opukea St.
Alternative Preference :	
Apt./Suite No. :	
City :	Aiea
State :	HI
Zip Code :	96701
Email :	gsc_hawaii@yahoo.com
Telephone :	808-953-8907
Telephone Extension :	
Add to Mailing List :	Both
Submission Method :	Website
Other Submission Method :	
Submission Date :	01/07/2009
Submission Content/Notes :	I fully support the Mayor and the Rail Transit

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, 3RD FLOOR
HONOLULU, HAWAII 96813
Phone: (808) 768-8305 • Fax: (808) 768-4730 • Internet: www.honolulu.gov

MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-332987

Ms. Kaiserlyn Sataraka
99-545 Opukea Street
Aiea, Hawaii 96701

Dear Ms. Sataraka:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraph addresses your comments regarding the above-referenced submittal:

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information this selection is discussed in Section 2.4 of the Final EIS. Since publication of the Draft EIS, design has been advanced, further analysis has been completed, and information has been added in response to comments on the Draft EIS and agency coordination. The Final EIS discusses the process that was used to select the Preferred Alternative, how comments were considered in the decision-making process, impacts and mitigation commitments.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
Creation Date :	1/7/2009
Creator Affiliation :	
First Name :	Samuel
Last Name :	Sataraka
Business/Organization :	Good Samaritan Church
Address :	99-545 Opukea St.
Alternative Preference :	
Apt./Suite No. :	
City :	Aiea
State :	HI
Zip Code :	96701
Email :	tanusataraka@yahoo.com
Telephone :	808-699-1205
Telephone Extension :	
Add to Mailing List :	Both
Submission Method :	Website
Other Submission Method :	
Submission Date :	01/07/2009
Submission Content/Notes :	Go Mayor and do the right thing

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, 3RD FLOOR
HONOLULU, HAWAII 96813
Phone: (808) 768-8305 • Fax: (808) 768-4730 • Internet: www.honolulu.gov

MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-333005

Mr. Samuel Sataraka
99-545 Opukea Street
Aiea, Hawaii 96701

Dear Mr. Sataraka:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraph addresses your comments regarding the above-referenced submittal:

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information this selection is discussed in Section 2.4 of the Final EIS. Since publication of the Draft EIS, design has been advanced, further analysis has been completed, and information has been added in response to comments on the Draft EIS and agency coordination. The Final EIS discusses the process that was used to select the Preferred Alternative, how comments were considered in the decision-making process, impacts and mitigation commitments.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
Creation Date :	1/7/2009
Creator Affiliation :	
First Name :	Tracie
Last Name :	Sataraka
Business/Organization :	
Address :	99-545 Opukea St.
Alternative Preference :	
Apt./Suite No. :	
City :	Aiea
State :	HI
Zip Code :	96701
Email :	gsc_hawaii@yahoo.com
Telephone :	808-693-5926
Telephone Extension :	
Add to Mailing List :	Both
Submission Method :	Website
Other Submission Method :	
Submission Date :	01/07/2009
Submission Content/Notes :	I totally agree with the mayor, we need to build the Rail Transit

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, 3RD FLOOR
HONOLULU, HAWAII 96813
Phone: (808) 768-8305 • Fax: (808) 768-4730 • Internet: www.honolulu.gov

MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-332982

Ms. Tracie Sataraka
99-545 Opukea Street
Aiea, Hawaiil 96701

Dear Ms. Sataraka:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraph addresses your comments regarding the above-referenced submittal:

Your preference for a Fixed Guideway Transit Alternative has been noted. While each of the alternatives discussed in the Draft EIS includes trade-offs between benefits and impacts, the Airport Alternative from East Kapolei to Ala Moana has been selected as the Preferred Alternative as described above. As compared to the alternatives discussed in the Draft EIS, the Airport Alternative will carry the most passengers, provide the greatest transit-user benefits, and result in the fewest vehicle hours of delay. It will provide access to employment centers at Pearl Harbor Naval Base and Honolulu International Airport and will serve the Salt Lake neighborhood with connecting bus service. Of the three Build Alternatives addressed in the Draft EIS, the Airport Alternative will have slightly less impacts to the natural and built environment analyzed in the Draft EIS. During the public comment period on the Draft EIS, the public overwhelmingly supported the Airport Alternative. Of the comments that specifically supported one of the alternatives, more than 75 percent were in support of the Airport Alternative. For more

information this selection is discussed in Section 2.4 of the Final EIS. Since publication of the Draft EIS, design has been advanced, further analysis has been completed, and information has been added in response to comments on the Draft EIS and agency coordination. The Final EIS discusses the process that was used to select the Preferred Alternative, how comments were considered in the decision-making process, impacts and mitigation commitments.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

988244

Lane O. Sato
607 North King Street #126A
Honolulu, Hawaii 96817
Phone: 808-220-1108

Mr. Wayne Y. Yoshioka, Director
Department of Transportation Services
City and County of Honolulu
650 South King Street, 3rd Floor
Honolulu, Hawaii 96813

Mr. Yoshioka:

Thank whoever for wasting more of our tax dollars by sending out this piece of garbage of a plan. Maybe this letter will convince whoever is behind this project that someone is making a big mistake with this proposed rail system project. This is not going to totally solve the immediate traffic problem on this island, in fact, it is going to make it worse. Please take into consideration the following, which it seems, no one wants to address, which makes me believe that this whole rail thing is just to line a segment of the populations pockets with a lot of money.

The simple solution to this problem is to understand what is truly at stake here. Take into account the following aspects that are being grossly and negligently under looked:

1. The bus system really works fine. The real problem is too many cars on the island congesting limited major East-West thoroughfares, not lack of mass transit.

2. If the rail project begins, you think you got gridlock now, just wait until construction hits the inner city. People will be cursing the project every day they spend an extra two plus hours creeping inch by inch in traffic, burning gas and this will not be just a one or two year project. And what about when there is a major traffic incident on H-1, the rail does not offer any solutions to that.

3. The tracks will not be extended into the upper lying areas so, you would have to plan for an extra hour or two just to get to and from the stations, which means you will not or hardly ever use it. And, even if it is decided to extend to upper lying areas, can you imagine the gridlock during construction then?

4. Like the poll says, this will only benefit a handful of people, mainly the one's who are to profit.

5. A more advantageous solution is to build a causeway from Waianae to Waimanalo over the water spanning the entire Southern Coast and later, if necessary, continue around the island, or, constructing a freeway along the mountain ranges. After pitching this idea with engineers at the town hall meeting at the Blaisdell, they said "no problem, in engineering we can build anything".

The major consideration for this idea is that H-1 desperately needs a major East-West alternate route. For those of you thinking this would be an eye sore to the coastline or the mountain ranges consider this: If built properly, it would probably enhance the view and in reality is one of two sensible solutions. We need to give up something and giving up the causeway or freeway project to rail would tragically be the wrong choice for the majority if not all of Oahu inhabitants. We must not allow the Offices of the Mayor and their constituents to perpetrate this masochistic behavior on the future of this State.

6. The Offices of the Mayor and their constituents have jumped into this project without careful consideration of all practical/reasonable solutions and are drooling at the potential for lining their pockets with a very hasty and ill thought out plan. Look at it this way, they can still line their pockets with the causeway/freeway project which is the smarter solution.

So, to recap, the main problem is too many cars on the island with no alternate East-West freeway relief, not lack of mass transit. This is the major point here. The bus system would work fine with fewer cars jamming limited traffic signaled East-West thoroughfares. As a fellow taxpayer, please be sensible and come to this realization. If built with a well planned scheme, this would benefit Oahu and relieve major traffic stress for years to come. Any other idea would be inviting seriously dire economic, political and social consequences for the future of our keiki and the State.

I hope you can convince the Mayor and his constituents to re-evaluate. I personally prefer the mountain range solution as this would allow cutoffs to service both sides of the island. Either the causeway or the mountain range construction solutions would not severely impair the day to day business operations of the island as the rail project will. Please take this into strong consideration and at least present this to whoever is trying to ram this down our throats. If you cannot provide a favorable response to this issue then do not bother responding. I will assume that you also sold out.

Mr. Matley, if it is within your power, please find a way to save the people of Oahu's future by overturning/disapproving this stupendously horrific project. You are one of the last and probably only resorts left to stop this hastily irrational and ill conceived project.

Respectfully,

Lane O. Sato

Cc: Mr. Ted Matley
FTA Region IX
201 Mission Street, Suite 1650
San Francisco, California 94105

AR00003169

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-335130

Mr. Lane O. Sato
607 North King Street, #126A
Honolulu, Hawaii 96817

Dear Mr. Sato:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

This letter will address your comments in the same manner presented.

Concerning your first paragraph, traffic congestion (as measured by vehicle hours of delay (VHD)) will decrease 18 percent with this Project compared to No Build conditions. The No Build Alternative includes all the highway projects identified for implementation by the City and State by 2030. As shown in Tables 3-9 and 3-10 in the Final EIS, traffic on roadways will improve with this Project compared to No Build conditions.

1. *As indicated in Chapter 3 of the Final EIS, bus transit speeds have been decreasing (Figure 3-1) while bus service reliability (Figure 3-2) has deteriorated. In 2006, 30 percent of bus system arrivals were more than five minutes late. As a result of longer bus travel times, approximately 128,592 additional revenue*

hours of bus service were needed in 2007 to deliver the same amount of service TheBus provided in 1984. This inefficiency consumed about $13.5 million in additional annual operating budget expenses in 2007 (in 2007 dollars) without adding new service.

2. *Of all the alternatives examined, the fixed guideway system is the most effective at reducing congestion on roadways. As shown in Table 2-2 of the Final EIS, a Managed Lane Alternative would reduce VHD by 4 percent and increasing bus service would decrease VHD by 2 percent. As shown in Table 3-14 of the Final EIS, the fixed guideway system will reduce VHD by 18 percent.*

   While there is usually some inconvenience during major construction projects, as discussed in Chapter 3 of the Final EIS, a Maintenance of Traffic (MOT) Plan will identify measures to mitigate temporary construction-related effects on transportation. The contractor will develop the MOT with approval from the City and the Hawaii Department of Transportation. The MOT Plan will address roadway closures for streets identified in Table 3-27 of the Final EIS. Temporary lane closures will occur during non-peak hours so that effects on heavy commuter traffic will be minimized.

   In addition, the fixed guideway system does provide an alternative if there is an accident on the H-1 Freeway. The fixed guideway system will be a parallel facility and will not be affected by roadway conditions. Thus, if the H-1 Freeway is shut down due to an accident, the fixed guideway system will continue to operate.

3. *It is not clear what is meant by "upper lying areas." For purpose of this response, it is assumed to mean Central Oahu. Figure 3-7 in the Final EIS represents the time required to complete a trip from origin to destination and assumes that at least a portion of the trip will be made on the fixed guideway system. As shown in this figure, trips from Mililani, which is not along the alignment, to Downtown will decrease from nearly 100 minutes under 2030 No Build conditions to approximately 55 minutes with the fixed guideway system. Since the fixed guideway system is in an exclusive right-of-way, travel times will always be consistent, regardless of roadway conditions. In addition, the fixed guideway system is expandable. A park-and-ride facility will be provided at the Pearl Highlands Station, thereby allowing individuals to drive to access the fixed guideway system, and bus service will be enhanced to coordinate with the system.*

4. *The fixed guideway system is designed to serve major destinations in the most heavily travelled corridor on Oahu, plus the area with the greatest expected growth. In 2000, 63 percent of Oahu's population and 80 percent of its jobs were located within the study corridor. By 2030, these distributions will increase to 69 percent of the population and 83 percent of the employment. As a result, it is anticipated that the rail transit system will be used by a wide cross-section of the local population. Under the Project, transit travel-time benefits will occur for several communities with high concentrations of transit-dependent households*

(see Figure 3-5 in the Final EIS). There will be substantial travel-time benefits for transit-dependent communities such as Waipahu, West Loch, Waikiki, Chinatown, and Makakilo.

5. *Your preference for a causeway along the southern coast or mountain range solution is noted. As described in Section 1.1 of the Final EIS, a makai freeway was considered during the 1960s and rejected. One of the concepts would have connected from Hawaii Kai to Honolulu Harbor as an offshore freeway. The project was rejected by the Hawaii Department of Transportation around 1970. Any interest in reviving the concept for such a project should be directed to the Hawaii Department of Transportation. Construction of the transit project will not preclude the construction of a causeway.*

6. *Your opposition to the Project is noted. Various highway improvements have been considered for Oahu. The Hawaii Department of Transportation, which is responsible for the freeway system, has evaluated needs for the freeway system and identified the highway projects that would be most efficient at reducing congestion on Oahu. The projects are listed in Table 2-4 of the Final EIS and included in the analysis for all project alternatives.*

   Chapter 2 of the Final EIS summarizes the alternatives screening and selection process. Beginning in the fall of 2005, an initial screening process considered alternatives identified through previous transit studies, a field review of the study corridor, an analysis of current population and employment data for the study corridor, a literature review of technology modes, ongoing work completed as part of the Oahu Regional Transportation Plan 2030 (ORTP) prepared by the Oahu Metropolitan Planning Organization (OahuMPO) (OahuMPO 2007), and public and agency comments received during the formal Alternatives Analysis scoping process.

   The screening process is documented in the Honolulu High-Capacity Transit Corridor Project Alternatives Screening Memorandum (DTS 2006a). Three scoping meetings were held during the screening process in December 2005, which included a presentation of initial alternatives to the public, interested agencies, and officials to receive comments on the Purpose and Need, alternatives, and scope of the Alternatives Analysis. Refinements were made to the alternatives based on the public input during scoping.

   After completion of screening in the winter of 2006, the following alternatives were studied in the Alternatives Analysis: No Build Alternative, Transportation System Management (TSM) Alternative, Managed Lane Alternative, and the Fixed Guideway Alternative. After review of the Alternatives Analysis Report and consideration of public comments, the City Council identified a fixed guideway transit system extending from Kapolei to UH Manoa with a connection to Waikiki as the Locally Preferred Alternative. This identification, which eliminated the TSM and Managed Lane Alternatives from further consideration, became Ordinance 07-001 on January 6, 2007. The NEPA

process considered a range of alternatives that was consistent with the identified Locally Preferred Alternative. As discussed in Section 2.2, there were no alternatives that had not been previously studied and eliminated for good cause that would satisfy the Purpose and Need at less cost, with greater effectiveness, or less environmental or community impact.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Action Pending
Creation Date :	11/2/2008
Creator Affiliation :	
First Name :	Charles
Last Name :	Scott
Business/Organization :	Citizen
Address :	566 Ahina Street
Apt./Suite No. :	
City :	Honolulu
State :	HI
Zip Code :	96816
Email :	cscott@aloha.com
Telephone :	734-3028
Telephone Extension :	
Add to Mailing List :	Both
Submission Method :	Website
Other Submission Method :	
Submission Date :	11/02/2008
Submission Content/Notes :	I think it is ridiculous for a city the size of Honolulu to attempt this project- it is too costly for the size of our city. Already, annual property tax collections for the past several years have increased several hundred per cent greater than ability of people to pay (cost of living increase). For example, r.p. tax collections for fiscal year 2007-08 increased 23.4% while cost of living went up 4.9%!!! The three previous years the increases were similar. (Tax Foundation of Hawaii figures). How can we possibly take on the high coast of building & maintaining the rail system???? It is all about City politics and satisfying the unions!!!!

DEPARTMENT OF TRANSPORTATION SERVICES

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT8/09-330320

Mr. Charles Scott
566 Ahina Street
Honolulu, Hawaii 96816

Dear Mr. Scott:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraph addresses your comments regarding the above-referenced submittal:

Sections 6.3.2 and 6.3.3 of the Final EIS describe the funding sources anticipated to be used to pay for the capital cost of the Project and the City's overall public transportation system. Capital costs of the Project, including finance charges, are expected to be fully paid for by a combination of Federal Transit Administration (FTA) Section 5307 and 5309 New Starts Funds from the Federal government and revenues from the County General Excise and use Tax (GET) surcharge levied from 2007 through 2022. As discussed in Section 6.4.2, the City's contribution to transit operation and maintenance is currently provided through federal funding, fare revenues, and the City's General and Highway Funds. This funding will be used to fund transit operation and maintenance of the Project. The General Fund includes property tax revenues and other taxes and fees. Property tax revenues are not expected to be used to fund construction of the Project.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

298464

SCOTT HAWAII

January 30, 2009

Mr. Wayne Yoshioka
Department of Transportation Services
City and County of Honolulu
650 So. King St., 3rd Floor
Honolulu, HI 96813

Mr. Ted Matley
U.S. Department of Transportation
Federal Transit Administration – Region IX
201 Mission St., 3rd Floor
San Francisco, CA 94105

RECEIVED
09 FEB 5 P12:35
DIRECTOR'S OFFICE
DEPT. OF
TRANSPORTATION SERVICES

Re: Draft Environmental Impact Statement for Proposed Mass Transit

Messrs. Yoshioka and Matley;

As an owner of property and a business at 1212 Kona St. in Central Kakaako, it is apparent that the Honolulu High Capacity Transit will have a very direct and substantial impact on our immediate area, and greatly influence our ability to continue operating at this location. There are four areas where the DEIS has insufficient information regarding the impact to our business and the Kakaako community:

1. The impact of Mass Transit on the narrow streets in Central Kakaako, specifically Halekauwila St. and Kona St.
2. The design flaw which is referred to in the DEIS as the "third rail", which will "eventually" go over Ala Moana Shopping Center and connect to the University of Hawaii Manoa and Waikiki.
3. Mass Transit displacing many small light industrial businesses in Kakaako that ultimately will not be able to find a replacement location to service their current customer base.
4. The cost of the Honolulu High Capacity Transit and the City and County of Honolulu's ability to properly fund and pay for building and operations in the current financial situation.

1. Kona St., at 40' wide between Piikoi and Pensacola St, and Halekauwila St. at 50' wide, will be dramatically impacted during construction and after completion of the Honolulu High Capacity Transit. None of this is addressed completely in the DEIS.

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California Office: 120 Birmingham Drive, Suite 250 D, Cardiff by the Sea, CA 92007 • Tel: (760) 634-7624
e-mail: info@scotthawaii.com website: www.scotthawaii.com

There will be a loss of parking, especially on Kona St., to accommodate the bridge supports rather than a center column, and access to our building will be blocked. Kona St. between Piikoi and Pensacola, will also be adversely affected by the possible "third rail" that will need to be planned far with wider column supports during the initial construction, necessitating a wider footprint and additional property acquisitions. This was not made public until after the election to approve Mass Transit.

Kona St. is the main access for cars to go from Ala Moana to the Ward area, and building the rail down Kona St. would make an already stressed situation even worse. What will the City do to alleviate this problem during and after construction? Access to our building and others on Kona St. is already a problem with the current level of traffic on one of Kakaako's narrowest streets, a problem that has not been addressed in the DEIS. Relocating the route to Kapiolani Blvd. would clean up what is now a circuitous route through a highly dense Central Kakaako and lessen the impact to an already stressed infrastructure.

2. Prior to the election in 2008, the City and County of Honolulu proudly proclaimed that the Honolulu High Capacity Transit would go from Kapolei to the University of Hawaii Manoa and with a spur to Waikiki. There was never a mention of the line stopping at the Ala Moana Shopping Center with a station 40' high, and a single third rail eventually being built to do a flyover of the Nordstrom extension at the Mall at 100' high, continuing past the center. The DEIS does not address how the city plans on accomplishing this with a station at 40' and another at 100'. How will riders make the transfer? How will the rail cars wind their way past the shopping center through the various high rise buildings past Nordstrom toward Waikiki? Is the 5% grade the train will have to climb from Pensacola to the station at Nordstrom too steep? What will be the effect regarding noise for those businesses and condos in the immediate area?

This is a fatal design flaw that could be addressed with a route change to Kapiolani Blvd. if the City and County of Honolulu truly wanted to go to the University of Hawaii Manoa and Waikiki, something the voters thought they would be getting with a vote for rail.

3. Kakaako is the last light industrial area in Central Honolulu, home to thousands of small businesses serving the main population center of the City and County of Honolulu. This is where most of the displaced properties will came from if rail is built and if there is no route change. What will be the steps the City takes to mitigate the effect on those businesses to relocate elsewhere? Where will the customers that frequent these businesses go if rail goes through Central Kakaako? Is the current infrastructure adequate to accommodate the praposed transit oriented development the City wants to implement should rail become a reality?

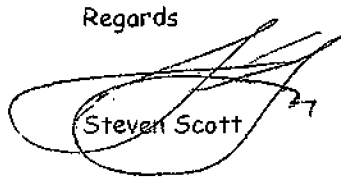
Who will pay for the improvements to the infrastructure when Kakaako is currently mostly unimproved? What is the position of the City and County of Honolulu vis a vis the HCDA, which controls Kakaako Mauka for the State when it comes to improvements and zoning? This should be spelled out in the DEIS and is not. A change of route to Kapiolani Blvd. or King St. would make more sense, preserving the Central Kakaako area to serve the residents of Honolulu.

4. Considering the current economic situation the City and County of Honolulu is in with a shrinking property tax base and declining revenue from the General Excise Tax, how will this Honolulu High Capacity Transit be paid for and operated? There will never be sufficient passengers of rail to pay for its operation, as well as continuing to operate the bus that would be required as a feeder for the rail line. Can the City and County of Honolulu depend on the federal government to continue to cover any shortage in operating costs? Has the City been open about the necessity for a property tax increase to pay for the added costs, and how accurate are the City's projections to operate rail? The General Excise Tax income is set to run out in 2022, and the revenue stream is currently under projections and shrinking each month with the economic downturn in Hawaii, where will the City makeup this shortage? Was this economic downturn anticipated in the DEIS, and shouldn't the City be required to address this in a supplemental DEIS prior to startup?

. Will the State of Hawaii's new plans for traffic mitigation on the H1 freeway going east to reduce the bottleneck at Middle Street, and the plans to have a flyover on Nimitz Hwy affect rider ship for the Honolulu High Capacity Transit and thus impact toll box revenue? Will this make obsolete the figures on usage the City used in the current DEIS, and thus change the feasibility of Mass Transit for Honolulu?

The only salution is to have a supplemental draft environmental impact statement that would address these and many other concerns and questions regarding the feasibility of Mass Transit for Honolulu. The current DEIS is so vague on so many issues, and the City's lack of timely disclosures makes it difficult to understand the feasibility for a project of this magnitude in the City and County of Honolulu. Also, it is disingenuous for the City to place any credence in the vote to approve rail when it was not apen about the specifics of the rail plan until after the election. Had the voters known about these four issues and others would it still have been approved?

Regards



Steven Scott

DEPARTMENT OF TRANSPORTATION SERVICES

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DEPUTY DIRECTOR

June 11, 2010

RT10/09-336289

Mr. Steven Scott
Scott Hawaii
1212 Kona Street
Honolulu, Hawaii 96814

Dear Mr. Scott:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

Your comments will be addressed in the same manner as submitted.

1) *As discussed in Section 3.4.7 of the Final EIS, mitigation strategies to offset lost parking will be coordinated with appropriate stakeholders.*

   The third track in the segment along Kona Street between Piikoi Street and Pensacola Street is not part of the Project but will be constructed as part of a future extension. However, the properties needed for the third track are shown as part of the Project's impact. As indicated in Section 4.6.3 of the Final EIS, ongoing coordination efforts with the public will help develop design measures that will enhance the interface between the transit system and the surrounding community. The extent, nature, and location of these design measure will be determined through these coordination efforts.

With regard to traffic at stations, future conditions at all stations were examined as part of the transportation analysis conducted for the Draft and Final EISs. As indicated in Section 3.4.3 of the Final EIS, the analysis identified potential effects of the Project on local traffic near stations, including an analysis of the effects of column placements on traffic. In addition, intersection analyses were conducted near stations with park-and-ride facilities, kiss-and-ride drop off, stations with anticipated high volumes of local bus access, and near the maintenance and storage facility for guideway vehicles. The analysis considered future traffic volumes and planned transportation facility improvements. The assessment indicated that, with the Project, traffic conditions will operate at acceptable levels-of-service on Kona Street except at the intersection of Kona and Keeaumoku Streets. Section 3.4.7 of the Final EIS identified potential mitigation strategies that would address potential effects.

As indicated in Section 3.5.7 of the Final EIS, a Maintenance of Traffic (MOT) Plan will be prepared by the contractor with approval from the City and/or the Hawaii Department of Transportation, as appropriate. The MOT Plan will identify measures to mitigate temporary construction-related effects on transportation. Table 3-27 in the Final EIS identifies roadways that will be affected during construction.

In the future, a revision to traffic flow planned by others in the area will open Waimanu Street to Ewa-bound traffic, which will provide a direct link to the Ward area along Queen Street and remove a major demand from Kona Street, thereby making it better able to accommodate the fixed guideway and local needs. This was evaluated in the assessment of traffic conditions resulting from the placement of a station at Ala Moana Center. This finding is included in Section 3.4.3 of the Final EIS.

DTS has considered the complexities and interdependencies of the Kakaako district and, overall, the Project is expected to strengthen the district's function as an employment center. The Project also could bring in new customers for businesses and services because of the increased mobility and access the new transit mode will bring to a wider region. An alignment on Kapiolani Boulevard would have substantial adverse effects to the transportation system.

2) *The Project has logical termini and independent utility from any extensions that may be constructed in the future. The future extensions to East Kapolei, Salt Lake Boulevard, Waikiki, and UH Manoa are discussed in the cumulative impacts sections of Chapters 3 and 4 of the Final EIS. The future extensions are not part of the Project; thus, they are not required to be evaluated under Chapter 343 of the Hawaii Revised Statutes and NEPA. Under NEPA, environmental analysis is only required when there is a proposed action by a Federal agency. Here, because the future extensions are not proposed for implementation at this time they are not part of the Project studied in the Final EIS. It would be premature to undertake an environmental analysis of the extensions (beyond the cumulative impacts analysis) because they are not part of the proposed action to be taken by the City and FTA. If the future extensions are proposed for implementation at some time in the future, environmental analysis of the extensions and appropriate*

alternatives will be undertaken at that time. Connection to UH Manoa and Waikiki will be served by busses integrated with the system.

The Project terminates at Ala Moana Center with a station platform approximately 40 feet above ground level. If a future extension is constructed beyond Ala Moana Center, service that terminates at Ala Moana Center would use the lower platform, while through service would use an upper platform. Riders traveling to UH Manoa or Waikiki would use the upper platform, while those traveling Ewa could use either platform. Detailed design has not been completed for extension beyond this location, but planning-level design would have the guideway continue to follow Kona Street, then transition to Kapiolani Boulevard prior to Mahukona Street.

Between Pensacola Street and the terminal station, the Project's grade will be less than 1 percent. Any future extensions would be built to project specifications. In addition, the grade has no effect on noise from vehicles.

3) *As presented in Section 4.4.3 of the Final EIS, the City will assist all affected persons in locating suitable replacement housing and business sites within an individual's or business's financial means in compliance with the Federal Uniform Relocation Assistance and Real Property Acquisition Policies Act.*

   In addition, as discussed in Section 4.6.3 of the Final EIS, "Kakaako has been designated a redevelopment area, which may result in a change in character along the Project alignment." This section of the Final EIS also notes that "...substantial development has recently occurred in the neighborhood; several high-rise condominiums have been built, and additional residential and commercial developments are planned" so it would appear that the necessary infrastructure is either in place or would be constructed by the City to support transit-oriented development (TOD). Necessary infrastructure improvements will be made as needed by the responsible city agency or private developer.

   DTS began coordinating with the Hawaii Community Development Authority (HCDA) during the Alternatives Analysis process. HCDA has planning responsibilities within Kakaako. Section 4.21 of the Final EIS identifies approvals that will be required from HCDA.

   The alignment through the Ala Moana-Kakaako neighborhood was selected to provide a direct connection with Ala Moana Center, as this is one of the highest traffic generators within the project corridor. An alignment on either Kapiolani Boulevard or King Street would result in additional length to the transit system in order to make the connections between the Downtown area and Ala Moana Center.

4) *Chapter 6 of the Final EIS discusses funding sources for capital costs and the ongoing operating and maintenance costs of the alternatives. City funding for the capital costs of implementing the Project is expected to come from the 0.5 percent County General Excise and Use Tax surcharge. This surcharge has been in place since January 1, 2007, and will expire December 31, 2022. The*

current economic downturn has been taken into account in the Final EIS. Capital costs of the Project, including finance charges, are expected to be fully paid for by a combination of FTA Section 5309 New Starts Funds from the Federal government and the GET surcharge revenues collected from 2007 through 2022 on Oahu. Operating and maintenance costs will be paid for from the same sources currently used for TheBus: Federal funding, fare revenues, and City revenues from the General and Highway Funds. City funding for transit operating and maintenance costs comes from the General Fund and Highway Fund, which receive revenue from a variety of currently existing taxes. Whether any of these taxes will be raised in the future will be decided as part of the City's annual budget process and would most likely be decided on a variety of issues, not just transit costs. Fixed guideway operation costs will represent between 2 and 3 percent of the City's annual operating budget. As noted in Chapter 6, City policy states that the transit system as a whole must recover between 27 and 33 percent of operating costs from farebox revenue.

A travel demand forecasting model was used to determine fixed guideway ridership in 2030. This model considers all roadway projects listed in the Oahu Regional Transportation Plan (ORTP), including a Nimitz Flyover and mitigation measures on the H-1 Freeway near Middle Street. Table 2-4 in the Final EIS lists committed projects from the ORTP that were included in all modeling results. As a result, ridership numbers presented in the Draft and Final EISs reflect these projects.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

SERVCO PACIFIC INC.
2960 Pukoloa Street • Suite 300 • Honolulu, Hawaii 96819 • Telephone: (808) 564-1300 • Facsimile: (808) 523-3937 • www.servco.com

February 5, 2009

Via Email: wyoshioka@honolulu.gov and Regular Mail
Mr. Wayne Y. Yoshioka, Director
Department of Transportation Services
City and County of Honolulu
650 South King Street, 3rd Floor
Honolulu, Hawaii 96813

RE: Honolulu High Capacity Transit Corridor Project
Draft Environmental Impact Statement/Section 4(f) Evaluation

Dear Mr. Yoshioka:

Servco Pacific Inc. ("***Servco***") is the landowner of the following parcels of real property (in Waipahu and Kakaako):

Waipahu: TMK: (1) 9-4-015-014
(1) 9-4-015-015
(1) 9-4-015-022
(1) 9-4-019-055
(1) 9-4-019-061 (1/11th ownership interest)

Kakaako: TMK: (1) 2-1-031-030

which are located adjacent to the contemplated Honolulu High Capacity Transit route (the "***Project***"). Servco has for many years operated automotive facilities at both locations. In addition, the current Conceptual Right of Way Plans show that a portion of one of the Waipahu parcels (TMK: 1-9-4-019-061) and the Kakaako parcel are both designated for partial acquisition as part of the Project.

Consequently, the planned Project has an immediate, direct, and material impact on Servco. Therefore we submit the following comments based on our review of the Draft Environmental Impact Statement for the Honolulu High Capacity Transit Corridor Project dated November 2008.

In general, we are concerned about the adverse impact on our customers, employees, business activities, and automotive facilities which will be caused by the planned construction activities, noise, dust, realigned traffic flow, and modified vehicular access into the Servco properties as work progresses along the Project route in the

vicinity of the Servco properties. The Draft EIS states that prior to commencement of construction, the contractor will be required to develop a plan to reduce economic hardship for existing businesses along the project alignment during construction activities. However, the draft EIS does not address whether the neighborhood businesses will be informed by the City or the Contractor on construction activities near their properties and if these businesses would be afforded an opportunity to participate and provide input into that plan prior to its adoption into the construction contract. Servco also understands that the Project will likely be constructed in multiple phases and therefore feels that plan to address and reduce economic hardship along the Project alignment should be developed, reviewed and commented on by the neighborhood businesses in phases matched up to the actual construction schedule. Servco feels it is vital for both the Contractor and City to effectively communicate the Project's ongoing construction work and schedule on a regular and weekly basis in order to mitigate and minimize hardships to these neighborhood businesses so unanticipated problems can be addressed promptly and effectively. In our view, the opportunity to submit our input and comments to the Contractor and City on how our operations may be affected by the Project's construction work and the Contractor's mitigation plan is essential. This will allow us a reasonable opportunity to plan our business activities on the Servco properties in anticipation of the construction period and the disruption it will inevitably create.

The Servco properties which will be impacted by the Project are (a) Servco Auto Leeward ("***SAL***"), which includes an automotive showroom, service and parts facility, fronting Farrington Highway at Waipahu Depot Street, and an open parking lot (TMK: 1-9-4-019-061) (the "***Waipahu Property***"), and (b) Motor Imports ("***MI***"), a service and parts facility located in Kakaako on the corner of South Street and Halekauwila Street (the "***South Street Property***"). The Project will run by Servco's SAL dealership along Farrington Highway, and the Waipahu Transit Station will be located on one of the Waipahu parcel that Servco has an ownership interest. Motor Imports in Kakaako will be affected by the construction of the Civic Center Station near and on a portion of the South Street Property. Our comments regarding these specific properties are provided below.

A. Waipahu Property:

1. Due to the 30-feet high fixed guideways in the vicinity of the Waipahu Transit Station the visibility of our SAL dealership will be greatly reduced. Automotive dealerships value high visibility, street frontage, and convenient street access to attract customers for its vehicles for sale and to provide convenient access to service area for vehicles and parts for its customers.

2. The planned Waipahu Transit Station on Farrington Highway is in close proximity to our SAL operation, and construction activities will impact

traffic flow in both directions. In addition, there is The Oahu Regional Transportation Plan 2030 which includes the Farrington Highway widening project to relieve traffic congestion between Golf Course Road and Fort Weaver Road. What is the schedule for these projects? Will construction be phased in such a manner that these projects will not overlap? Will the City be coordinating the Farrington Highway work with the State? Will the City be retaining a consultant for a traffic study for the impact of the Project on the Project's routes?

3. The water table in the Waipahu area is high. What is the potential impact on the surrounding structures due to displacement of groundwater during drilling and installation of the foundation for the light rail system and associated transit stations?

4. There are overhead and underground utility lines along Farrington Highway and the cross streets. Will SAL's utility service be disrupted when these utility lines along Farrington Hwy are relocated?

5. As noted above, Servco has a one-eleventh ($1/11^{th}$) ownership in TMK: 1-9-4-019-061 in Waipahu. The City has plans for partial acquisition of this property. If traffic is rerouted to the cross streets of Awalu and Mokukaua, this will increase the vehicle traffic to the back of TMK: 1-9-4-019-0`55 which is wholly owned by Servco. As a landowner and business operator, how will we be kept informed of changes and activities affecting both parcels?

B. <u>South Street Property</u>:

1. Servco operates a parts and service facility on the South Street Property (TMK: 1-2-1-031-030). Automotive service operations are very land intensive. Pursuant to the Conceptual Right-of-Way Plans the City plans to acquire a portion of the South Street Property from Servco for the Civic Center Station. According to the Draft EIS, a land area of approximately 40 feet in width by 300 feet in length will be acquired. The proposed acquisition would involve the taking of the land and building housing our existing service bays and facilities, reduce the existing paved area for customer parking and adversely affect the existing South Street entry and exit into the South Street Property. The Draft EIS does not adequately consider a possible added cost to the City's acquisition of a portion of the South Street Property associated with coordinating the relocation of the service bays and facilities and reconfiguration of the South Street Property

so as to minimize disruption with the ongoing business activities on the South Street Property.

2. The Draft EIS does not adequately consider whether it is feasible for the Servco automotive business to continue in a reconfigured set up on the South Street Property after the taking of a portion of the South Street Property, and thus whether the City would have to acquire the entirety of the South Street Property and not just a portion thereof as currently contemplated in the Conceptual Right-of-Way Plan.

3. The Draft EIS does not appear to adequately consider the alternative of designing and building the Civic Center Transit Station on the vacant parcel of land located on the makai side of Halekauwila Street. Such an alternative could greatly minimize and mitigate the adverse impact on the existing Servco automotive facilities on South Street discussed in B.1 above.

4. The existing buildings on the property are older. We are concerned with how pile driving may affect the structural integrity of the buildings and the calibrated readings of automotive equipment used in Servco's automotive service business. Has consideration been given to alternatives that may be available to mitigate such impact?

5. Similar to the Waipahu Property, the water table in Kakaako is also very high. The Draft EIS does not indicate or adequately address how water displacement will be handled so as to protect and preserve the structural integrity of the structures on the South Street Property.

6. Street parking in the Kakaako area is inadequate at present. We are concerned that the influx of construction workers into the area during the course of the Project will make a bad situation even worse, as Servco employees, construction workers, and customers of neighborhood business will all be vying to use the already limited number of parking stalls in Kakaako. This problem will be compounded by lane closures and traffic circulation changes. The Draft EIS does not address how these problems will be mitigated or addressed? Will there be a traffic study on the impact of the Project for the Civic Center Transit Station and Halekauwila Street route?

As noted above partial land acquisition is planned for two Servco parcels, TMKs 1-9-4-019-061 (Waipahu) and 1-2-1-031-030 (Kakaako). The Draft EIS provides

insufficient information on the acquisition process and procedure, including without limitation, its timing and manner of determining compensation to affected landowner.

In the process of finalizing its Environmental Impact Statement for the Honolulu High-Capacity Transit Corridor Project, we ask that the City & County of Honolulu prudently address and respond to our questions and concerns.

Sincerely,

SERVCO PACIFIC INC.

Carol K. Lam (B)
Senior Vice President

cc: Ms. Katherine Puana Kealoha, Director
Office of Environmental Quality Control
235 South Beretania Street, Suite 702
Honolulu, Hawaii 96813
Via Email: oeqc@doh.hawaii.gov and Regular Mail

Mr. Ted Matley
FTA Region IX
201 Mission Street, Suite 1650
San Francisco, CA 94105
Via Email: ted.matley@fta.dot.gov and Regular Mail

DEPARTMENT OF TRANSPORTATION SERVICES

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

KENNETH TORU HAMAYASU
DEPUTY DIRECTOR

June 11, 2010 RT2/09-299122R

Ms. Carol K. Lam, Senior Vice President
Servco Pacific Inc.
2850 Pukoloa Street, Suite 300
Honolulu, Hawaii 96819

Dear Ms. Lam:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

General Comments

The comment about the impact of construction is acknowledged. As indicated in Sections 3.5.7 and 4.18.1 of the Final EIS, a Maintenance of Traffic (MOT) Plan will be developed by the contractor prior to construction and will address temporary effects on access to businesses during construction. Residents and businesses will be informed in advance of construction activities and the times and durations of such activities. Contractors will be required to work with businesses to reduce the impact on their operations. Proposed mitigation to reduce adverse economic hardships for existing businesses along the project alignment during construction activities will include the following:

- *Maintaining access to businesses during construction.*
- *Developing a public involvement plan prior to construction to inform business owners of the construction schedule and activities.*
- *Initiating public information campaigns to reassure people that businesses are open during construction and to encourage their continued patronage.*
- *Minimizing the extent and number of businesses, jobs, and access affected during construction.*
- *Coordinating the timing of temporary facility closures in cooperation with affected businesses to minimize impacts to business activities—especially those related to seasonal or high sales periods—to the extent practicable.*
- *Minimizing the duration of modified or lost access to businesses—as practicable.*
- *Providing signage, lighting, or other information to indicate that businesses are open.*
- *Providing public information (e.g., press releases or newsletters) regarding construction activities and ongoing business activities, including advertisements in print and on television and radio.*
- *Phasing construction in each area so as to maintain access to individual businesses for pedestrians, bicyclists, passenger vehicles, and trucks during business hours and important business seasons.*
- *Providing advance notice if utilities will be disrupted.*
- *Scheduling major utility shut-offs during non-business hours.*

The contractor will select appropriate measures to comply with fugitive dust requirements. The following control measures can substantially reduce fugitive dust:

- *Minimize land disturbance*
- *Use watering trucks to moisten disturbed soil*
- *Use low emission equipment when feasible*
- *Cover loads when hauling dirt*
- *Cover soil stock piles if exposed for long periods of time*
- *Use windbreaks to prevent accidental dust pollution*
- *Limit the number of vehicular paths and stabilize temporary roads*

- *Maintain stabilized construction area ingress/egress areas*
- *Wash or clean trucks prior to leaving construction sites*
- *Minimize unnecessary vehicular activities*

Noise permits will be obtained prior to the construction of each phase of the Project. The permits will regulate construction times and activities and include mitigation commitments. The following measures are examples of what could be included in the permits:

- *Develop a monitoring plan with noise limits*
- *Construct temporary noise barriers or curtains*
- *Equip construction equipment engines with adequate mufflers and intake silencers*
- *Strategically place stationary equipment, such as compressors and generators*

Public information teams will be established for each construction segment consisting of individuals familiar with that project segment. Team members will work with local businesses to inform them of the Project's construction status and upcoming construction activities, as well as address concerns that local businesses may have. Team members will consider establishment of regularly scheduled meetings with individual businesses to provide these updates and address concerns of affected businesses.

A. Waipahu Property

1. Between Waipahu Depot Road and Mokuola Street, the guideway height would vary from 30 to 45 feet above the Farrington Highway median. Column spacing will be about 150 feet on average, allowing for substantial space between supports. As acknowledged in Section 4.8.3 of the Final EIS, "...the guideway...will obstruct some makai and mauka views across the highway..." However, because the alignment is in the roadway median, views of businesses from vehicles traveling on the highway will not be significantly affected and access will not be impaired.

2. As discussed earlier, an MOT Plan will identify measures to mitigate temporary construction-related effects on transportation. The contractor will develop the MOT Plan with approval from the City and the Hawaii Department of Transportation (HDOT). The MOT Plan will address roadway closures for streets identified in Table 3-27 of the Final EIS. The detailed schedule of activities will be part of the contractor's construction planning.

As stated in Section 4.18.1 of Chapter 4 of the Final EIS and discussed above, access to businesses will be maintained during construction and a public involvement

plan will be developed prior to construction to inform business owners of the construction schedule and activities.

The schedule for the Farrington Highway widening project has not yet been established by HDOT. Construction coordination is underway between the City and the State as it relates to the Project and the planned widening of Farrington Highway. Schedules will be coordinated between the City and the State to minimize overall construction disturbance. The City has traffic consultants that have been part of the development of the MOT Plan. Furthermore, both the City and contractors will provide traffic engineering support and will continue to be part of the Project through the construction phase.

The City will also coordinate construction of the Project with other construction projects in the area. A summary of project-related transportation effects, including temporary construction effects, is also included in Section 3.5.3 of Chapter 3 of the Final EIS. Effects could include lane closures and replaced or re-timed traffic signals. As discussed in Section 3.5.7of the Final EIS, the construction contractors will develop a MOT Plan to address temporary construction-related effects on the transportation network.

3. As discussed in Section 4.14.3 of the Final EIS, the Project will not result in any long-term changes to groundwater levels.

Any ground stabilization methods used during construction will be performed in a manner that protects and maintains existing conditions. Induced settlement or movement of nearby facilities will not be permitted.

4. Section 4.18.2 of the Final EIS explains that construction effects on utilities will be temporary and limited. Businesses, including Servco Pacific, will be provided with advance notice if utilities are to be disrupted. Major utility shut-offs will be scheduled to occur during non-business hours to the extent feasible and will be coordinated with all local businesses.

5. Continued coordination and public outreach will keep business owners informed throughout the project process regarding right-of-way acquisition and project construction. The Project team (City and contractor) has a public information program and public involvement staff that will be in contact with the local community during construction. They will conduct meetings with groups and individual businesses, distribute newsletters about the Project status and progress, distribute fliers to notify businesses of anticipated construction activity, establish a hot line to hear and address concerns as they develop, and sponsor a website to maintain the latest information available to any interested parties.

B. South Street Property

1. As presented in Section 4.4.3 of the Final EIS: "where relocation will occur, compensation will be provided to property owners, businesses, or residents in compliance with all applicable Federal and State laws and will follow the Federal Uniform

Relocation Assistance and Real Property Acquisition Policies Act (49 CFR 24). The City will assist all affected persons in locating suitable replacement housing and business sites within an individual's or business's financial means. The City will provide relocation advisory services to businesses where acquisition of adjacent property may substantially reduce clientele, limit accessibility, or affect a business in other substantial ways." The City will coordinate with the property owner to review access and business activity constraints associated with right-of-way acquisition and construction impacts. Regarding the South Street Servco property, there is no expectation that the business will need to change as a result of the Project. If there are other considerations to the affected business such as an impact to service bays, those will also be part of the discussions between the City and the property owner. Final design will determine the ultimate impact and proper course of action related to each business

2. There is no expectation that Servco will have to revise its operations on the site as a result of the Project. Further engineering work has occurred since the Draft EIS. The current requirement is for a land area of 20 feet by 200 feet and is not expected to impact existing buildings on the Servco property, as reflected in the Final EIS. This revised property impact is not expected to affect the current site configuration.

3. As shown in Figure 2-35 of the Draft and Final EISs, the Civic Center Station will have entrances on both the mauka and makai sides of Halekauwila Street. The makai side of the street is currently a parking lot. This station design was used in all analyses conducted for the Draft and Final EISs, including right-of-way acquisitions and cost, and is reflected throughout the documents. The two entrances are provided to improve access and safety at the station. The City has substantially reduced the size of the property acquisition requirement on the mauka property in the latest design. The current requirement is for a land area of 20 feet by 200 feet and is not expected to impact existing buildings on the Servco property, as reflected in the Final EIS.

4. Construction is anticipated to be completed using drilled-shaft foundations. This method is discussed in Appendix E to the Final EIS. It will not create substantial vibration levels as shown in the analysis of noise and vibration impacts of construction in Section 4.18.5 of the Final EIS. The planned activities are not anticipated to create vibration levels that would affect calibration; however, the City and contractor will work with Servco to address any unanticipated effects.

5. As explained in Section 4.14.3 of the Final EIS, the Project will not result in any long-term changes to groundwater levels. Permanent Best Management Practices will be installed to direct runoff back into the ground to recharge the system.

As stated above regarding the Waipahu area, any ground stabilization method used will be performed in a manner that protects existing conditions. Induced settlement or movement of nearby facilities will not be permitted.

6. Due to the limited amount of parking available to residents and businesses in and around construction sites, construction workers will not be allowed to park their personal vehicles in the public right-of-way. Construction workers will not be allowed to use commercial parking facilities if doing so reduces available parking for customers or

employees of that business. Approval is needed from the business owner before a private lot can be used for construction worker parking.

On-street parking by construction workers will not be permitted near a work site. During the actual hours of work, only those vehicles absolutely necessary for construction will be allowed within the safety zone or allowed to stop or park on the shoulder of the roadway.

Temporary lane closures are identified in Table 3-27 of the Final EIS. As previously discussed, the MOT Plan created by the construction contractor with approval from the City and/or HDOT, will identify treatment and management of construction-related effects on the local transportation system. The long-term effects on the transportation system (e.g., Halekauwila Street) are part of the traffic analysis discussed in Chapter 3 of the Final EIS.

Additional traffic studies are not anticipated as part of the MOT Plan. However, as stated in Section 3.5.6 of Chapter 3 of the Final EIS, access to businesses will be maintained during construction and a public involvement plan will be developed prior to construction to inform business owners of the construction schedule and activities.

Regarding the property acquisition comment, Servco Pacific will be contacted by the City regarding the acquisition of any property required for the Project. All potentially affected property owners have been notified by letter and will be contacted in person to discuss the acquisition process.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
Creation Date :	12/26/2008
Creator Affiliation :	
First Name :	Corey
Last Name :	Shibata
Business/Organization :	citizen of Honolulu
Address :	1304 Nauiu Place
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City :	Honolulu
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Telephone Extension :	
Add to Mailing List :	Email
Submission Method :	Website
Other Submission Method :	
Submission Date :	12/26/2008

Submission Content/Notes : I submit the following comments:

The Salt Lake route should be used because:
1. It will get more working citizens off the road since it will run through a high density population,
2. The airport track can be added later. Residents will not use the transit to the airport since they have so much to carry.
3. Tourists from the airport won't even use the transit until the Waikiki track is constructed.
4. Rush hour traffic M-F are mostly single person vehicles. Tour buses and taxis are insignificant.
5. Rush hour traffic on Sat are mostly residents. Tour buses and taxis are insignificant.

The route should run East from Kapolei to Fort Weaver Rd and up to Farrington Hwy because:
1. Again the route would run through a high populated area.
2. With the transit running past LCC, HCC, and UH Manoa there is no need to build a West Oahu College. If West Oahu College is built, then they can provide their own shuttles like UH.

More Stops from Ewa to Kalihi Should be Built because:
1. It will promote more ridership (closer walking/biking distance to stations).
2. There are a lot of businesses in Waipahu, Pearl City, and Mapunapuna where citizens will go to work.

Construction Schedule need to be fast tracked (build outwards from stations) because:
1. If cost is an issue, then it should be built asap.
2. Ridership won't be significant until the downtown tracks are completed.
3. The economy needs help now. Not 10 years from now.

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-332258

Mr. Corey Shibata
1304 Naulu Place
Honolulu, Hawaii 96818

Dear Mr. Shibata:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

Your preference for the Salt Lake Alternative has been noted. While each of the alternatives discussed in the Draft EIS includes trade-offs between benefits and impacts, the Airport Alternative from East Kapolei to Ala Moana has been selected as the Preferred Alternative as described above. As compared to the alternatives discussed in the Draft EIS, the Airport Alternative will carry the most passengers, provide the greatest transit-user benefits, and result in the fewest vehicle hours of delay. It will provide access to employment centers at Pearl Harbor Naval Base and Honolulu International Airport and will serve the Salt Lake neighborhood with connecting bus service. Of the three Build Alternatives addressed in the Draft EIS, the Airport Alternative will have slightly less impacts to the natural and built environment analyzed in the Draft EIS. During the public comment period on the Draft EIS, the public overwhelmingly supported the Airport Alternative. Of the comments that specifically supported one of the alternatives, more than 75 percent were in support of the Airport Alternative. For more

information this selection is discussed in Section 2.4 of the Final EIS. Since publication of the Draft EIS, design has been advanced, further analysis has been completed, and information has been added in response to comments on the Draft EIS and agency coordination. The Final EIS discusses the process that was used to select the Preferred Alternative, how comments were considered in the decision-making process, impacts and mitigation commitments.

The Airport Alternative serves major employment destinations. Visitor ridership accounts for a small percentage of overall ridership. As discussed in Section 3.4.2, 9,900 visitors will use the fixed guideway daily, of which 1,800 will be to or from the airport. Bus service will be enhanced between Ala Moana Center and Waikiki until the planned extension is built.

A Fort Weaver Road alignment was evaluated and rejected in the Alternatives Analysis. It would have been the most expensive option for serving the Ewa area, and no space would have been available to provide park-and-ride and bus transfer facilities.

Regarding your comments about stations, the location of fixed guideway stations was based on land use development plans, bus access, room for the station, and expected modes of access to the station. Many fixed guideway stations are located within a mile of each other. Typically, an individual will walk one-half mile to reach a high-capacity transit station. Accordingly, fixed guideway stations are close enough to each other to promote walking and biking access. The average travel speed of the rail line would be reduced if stations were located closer together.

Lastly, the Project is proceeding as quickly as practical, as illustrated in the schedule presented in Figure 2-42 of the Final EIS.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

TELL IT TO THE MAYOR

RECEIVED
CITY & COUNTY OF HONOLULU
CUSTOMER SVCS DEPT

A SUGGESTION PROGRAM

If you have a suggestion, idea or complaint, Tell It to the Mayor.

~~'09 DEC 27 A10:48~~

We've received some great ideas from this program – ideas which have saved money and helped us deliver better service.

All suggestions and complaints are confidential. By including your name, address and a daytime phone number, we are able to respond to you, if necessary.

Thanks for helping us serve you better.

Mufi Hannemann, Mayor
City and County of Honolulu
INTERNET: www.honolulu.gov

SUGGESTION: Have the rail system built not steel on steel because of our salt water air. Also have one of the first routes from the leeward and central areas to the University of Hawaii Manoa because if you have ever seen the improvement in traffic (currently) it is when the University of Hawaii system is not in session.

RECEIVED
CITY & COUNTY OF HONOLULU
CUSTOMER SVCS DEPT
'09 JAN -6 A10:52

JAN 03 2009

PEARL RIDGE SATELLITE CITY HALL

Karen Shimmark
NAME (PLEASE PRINT)

1/3/09
DATE

94-453 Mulehu Street Mililani Hi 96789
ADDRESS PHONE

Pearl Ridge
SUGGESTION BOX LOCATION

Thank You

CSD-4A (REV. 12/04)

AR00003199

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, 3RD FLOOR
HONOLULU, HAWAII 96813
Phone: (808) 768-8305 • Fax: (808) 768-4730 • Internet: www.honolulu.gov

MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT1/09-293935R

Ms. Karen Shimamura
94-453 Mulehu Street
Mililani, Hawaii 96789

Dear Ms. Shimamura:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

The system specifications, like those developed for many modern steel wheel on steel rail systems operating in tropical marine environments around the world, will consider the operating environment.

Corrosion control measures will be applied to the Project's fixed steel facilities and neighboring utility structures to provide proper operation over their lifetime. These measures include:

1. *Protective coating specification for steel aerial structures*
2. *Coating specification for stations*

3. *Preventive measures against stray current corrosion*

4. *Corrosion control design of transit underground utilities and neighboring utilities owned by others*

The Project has logical termini at East Kapolei and Ala Moana Center and independent utility from any extensions that may be constructed in the future. The future extensions to West Kapolei, Salt Lake Boulevard, Waikiki, and UH Manoa are discussed in the cumulative impacts sections of Chapters 3 and 4 of the Final EIS; however, the future extensions are not part of this Project. Thus, they are not required to be evaluated under Chapter 343 of the Hawaii Revised Statutes and NEPA. Under NEPA, environmental analysis is only required when there is a proposed action by a Federal agency. Here, because the future extensions are not proposed for implementation at this time, they are not part of the Project studied in the Final EIS. It would be premature to undertake an environmental analysis of the extensions (beyond the cumulative impacts analysis) because they are not part of the proposed action to be taken by the City and FTA. If the future extensions are proposed for implementation in the future, environmental analysis of the extensions and appropriate alternatives will be undertaken at that time. Bus service between Ala Moana Center and these destinations will be enhanced until those extensions are built. The Project is anticipated to remove a greater number of automobile trips from the roadway system than the number of UH Manoa-related automobile trips that occur when UH is in session.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

SIERRA CLUB
O`ahu Group
P.O. Box 2577, Honolulu, HI 96803
tel: 808.537.9019

February 6, 2008

Mr. Wayne Y. Yoshioka
Acting Director
Department of Transportation Services
City and County of Honolulu
650 South King Street, 3rd Floor
Honolulu, HI 96813

Mr. Brennon Morioka, Director
Department of Transportation Services
650 South King Street, 3rd Floor
Honolulu, Hawai`i 96813

Mr. Ted Matley
FTA Region IX
201 Mission Street, Suite 1650
San Francisco, CA 94105

Ms. Katherine Puana Kealoha, Director
Office of Environmental Quality Control
Department of Health
State of Hawai`i
235 South Beretania Street, Suite 702
Honolulu, Hawai`i 96813

Honolulu High Capacity Transit Corridor Project
Draft Environmental Impact Statement
Comments

Aloha:

Thank you for the opportunity to comment. Sierra Club Oahu Group is in general favor of the proposed transit project, but offers the following questions and comments that we feel would strengthen the EIS and, ultimately, provide a better project for Oahu's citizens.

Connectivity

The figures in Chapter 2 do a nice job of illustrating station layouts and entry points. The City and County need to provide maps that illustrate how people get to those entrances. These maps should consider a radius of ½-mile from the station. They should clearly indicate sid'Bwalk

Recycled Content

and bikelane connectivity to the stations. Infrastructure improvements to provide this connectivity should be part of the project, or at the very least a high priority of the City and County. The City and County has a mandate to improve walkability and bikeability in the city. Providing good connections to this transit system would go a long way to achieving that.

Will bikes, surfboards and luggage be allowed on the train? Will there be any restrictions on time of day (i.e. not allowed during commute hours)? What is the size limitation?

What pedestrian and bicycle amenities will be designed and built in or near transit stations?

Aesthetics and Viewplanes

The DEIS provides a thorough discussion on the visual impacts of the project, but provides little in the way of mitigating measures. Many other states utilize attractive concrete art to soften the impact of large highway structures. In addition to softening the visual impact, this strategy also appears to greatly inhibit grafitti. Walls in Arizona and Colorado are effective. In many locales, local artists design motifs that are incorporated in concrete surfaces. See the following link for examples: http://www.concretenetwork.com/anne_balogh/concrete_walls.htm

Why is the entire transit route elevated? Where geography permits, the transit route should be placed at ground level to reduce cost of construction, energy consumption during construction, and impacts to view planes.

Agricultural land

Prime, unique, and statewide important lands are, by definition, of agricultural importance. Land with such classification is *significant*, not negligible, regardless of acreage. To trivialize the conversion of such lands on the grounds that only a small amount of it will be sacrificed is not acceptable. Conversion of such lands is, according to the ALISH system that defines these classifications, irreversible and therefore not a decision that should be taken lightly or trivialized because of scale.

Once the rail transit route is in place, it is expected that development will occur along the route, and this Transit-Oriented Development will almost certainly affect important agricultural lands. In order for the final EIS for rail transit to accurately and completely examine the environmental impacts to agricultural lands, the project must include agricultural lands adjacent to project construction boundaries. The Final EIS should include a detailed discussion and mitigation plan for negative environmental impacts to agricultural land affected by this project including an analysis of alternative routes to preserve prime, unique, and/or statewide important agricultural land. If these agricultural lands are part of a planned development corridor, the EIS should describe how City and County planning and zoning measures assure that important agricultural lands outside the planned development corridor are preserved.

The transit system should have a terminus in Waipahu, rather than East Kapolei, and extend into Waikīkī and/or up to UH Mānoa instead of extending to East Kapolei where the majority of agricultural lands exist.

Air Quality

According to the DEIS, the methodology for projecting future air quality as a result of the various project alternatives is based on anticipated vehicle miles traveled (VMT) and average network speed for each alternative. The data given in the DEIS indicates that all Build Alternatives yield better air quality than the No Build alternative, which may not be true. Better air quality would only occur if the proposed rail transit system replaces enough cars on the road such that its emissions are less than the collective emissions of the cars it replaces. The EIS should discuss the possibility that the offset may not occur, and discuss measures of mitigation.

Energy

The Project should make every effort to maximize operating efficiency. The final EIS should also give more consideration as to the feasibility of integrating alternative energy technologies into the project as well as an analysis of potential energy conservation measures such as opting to build sections of the route at ground level rather than elevated where feasible.

What are the plans (if any) to run rail on renewable sources of energy (palm oil not included)?

What assumptions regarding ridership, VMT, etc. were made in determining the energy savings of each Build Alternative relative to the No Build Alternative?

Errors

Margins of error for all data, as well as a list of assumptions made, should be provided for clarity.

Cost

Will fares be subsidized to encourage ridership? If so, what is the target group for those subsidized fares?

What percent of the cost of rail (construction, maintenance and interest paid on bonds) is expected to be paid with fares? What if fares do not meet this percentage? Will fares and/or taxes be raised? By how much?

Please send comment responses to:

Sierra Club, O`ahu Group
ATTN: Randy Ching
1040 Richards St., Room 306
Honolulu, HI 96813

Sincerely,

Kim Kido
On behalf of the Sierra Club, O`ahu Group

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

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DEPUTY DIRECTOR

KENNETH TORU HAMAYASU
DEPUTY DIRECTOR

June 11, 2010 RT2/09-299024R

Ms. Kim Kido
Sierra Club, Oahu Group
P.O. Box 2577
Honolulu, Hawaii 96803

Dear Ms. Kido:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

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Connectivity

Regarding station access, as indicated in the Final EIS Table 3-20 overall access to public transit will be enhanced with the Project. A substantial portion of project riders will access the system by local bus and by walking and biking to the station. Bus, walk, and bike access to stations will account for approximately 90 percent of total trips in the a.m. peak period, 6 a.m. to 8 a.m. Several stations will be located near existing or planned bicycle facilities. As stated in Chapter 3, Section 3.4.5, the Oahu Bike Plan is currently being updated and is scheduled to be adopted in 2010. Maps that show sidewalk and bicycle facilities within a half mile of each fixed guideway station are under development and will be used as part of the station planning process. The draft update includes a prioritized list of bicycle projects developed using criteria that includes access to transit. Several projects that would connect existing or future bicycle facilities to rail transit stations are included in the draft update. Additionally, the City will provide parking facilities at four stations (East Kapolei, UH West Oahu, Pearl Highlands, and Aloha

Stadium). These stations were selected based on results from the travel demand forecasting model, which showed these stations had high drive-to-transit demand.

As shown in Table 3-20 in the Final EIS, 90 percent of fixed guideway riders will walk, bike, or take a bus to reach the stations, while the remaining 10 percent of riders will drive to park-and-ride facilities or be dropped off.

As stated in Section 2.5.5 of the Final EIS design criteria developed for stations place the highest emphasis on walk and bicycle access. The Design Criteria provide specific direction for pedestrian and bicycle access features at stations. For example, the criteria state that adequate pedestrian circulation routes shall be provided with an emphasis on avoiding pedestrian and vehicular conflicts and enabling good visibility to each station entrance. This emphasis will be complemented by distinct and clear graphic signage. For bicycle access, the criteria include language stating that racks shall be placed at the station plaza near the station entrance where public visual surveillance is possible and/or where closed circuit television monitoring is present.

As indicated in the Final EIS Section 4.6.3 ongoing coordination efforts with the public will help develop design measures that will enhance the interface between the transit system and the surrounding community. The extent, nature, and location of these design measures will be determined through these coordination efforts and as part of the station planning and design process. The figures in Chapter 2 of the Final EIS identify the location of new pedestrian facilities, such as the pedestrian bridges at Pearl Highlands shown on Figure 2-23. DTS is working with other City Departments and the Hawaii Department of Transportation to provide adequate facilities for all access modes and to encourage the development of pedestrian and bicycle improvements near stations to coincide with the Project.

Bicycles, luggage, and surfboards will be allowed on trains and regulated by policy to address high demand periods or special conditions. This policy is in development. Several stations will be located near existing or planned bicycle facilities. As stated in Chapter 3, Section 3.4.5, the Oahu Bike Plan is currently being updated and is scheduled to be adopted in 2010. The draft update of the Oahu Bike Plan includes a prioritized list of bicycle projects developed using criteria that includes access to transit. Several projects that would connect existing or future bicycle facilities to rail transit stations are included in the draft update. Additionally, the City will provide parking facilities at four stations (East Kapolei, UH West Oahu, Pearl Highlands, and Aloha Stadium). These stations were selected based on results from the travel demand forecasting model which showed these stations had high drive to transit demand.

Several stations will be at or near existing or planned bicycle facilities. The Final EIS Section 3.4.2 states that each station will have facilities for parking bikes, and each guideway vehicle will be designed to accommodate bicycles. Sidewalks and crosswalks are currently available at stations or will become available as streets and sidewalks are built in developing areas. At many stations, the Project will add new sidewalks or widen or otherwise improve existing ones. While the Project is coordinating with City and State agencies to encourage development of enhanced pedestrian and bicycle facilities near stations, the actual construction of such facilities is beyond the scope of the Project.

In addition, at the Pearl Highlands Station, pedestrian bridges will connect station entrances with nearby residential and commercial areas. The East Kapolei Station will include an enhanced pedestrian link between the park-and-ride facility and station entrances. For the

Honolulu International Airport Station, pedestrian walkways will connect the station to the Interisland and Overseas Terminals.

Aesthetics and Viewplanes

In Section 4.8.3 of the Final EIS, specific environmental, architectural, and landscape design criteria are listed that will help minimize visual effects of the Project. The City will implement the following measures to minimize negative visual effects and enhance the visual and aesthetic opportunities that the Project creates:

- *Develop and apply design guidelines that will establish a consistent design framework for the Project with consideration of local context; examples include:*
    - *Landscaping will be used to screen the traction power substations from sensitive adjacent land uses, such as residential areas.*
    - *Site-specific designs will be created to provide station identity and respond to individual site conditions, including views, trees, sun and wind patterns. Landscaping materials will soften views and help integrate project elements into the urban fabric of the communities it serves. Specialty stations will be treated with historic context and careful design to reinforce the uniqueness of context or use.*
- *Coordinate the project design with the City's transit-oriented development program within the Department of Planning and Permitting.*
- *Conduct public involvement workshops to consult with the communities surrounding each station for input on station design elements.*
- *Consider specific sites for landscaping and trees during Final Design when plans for new plantings will be prepared by a landscape architect. Landscape and streetscape improvements will serve to mitigate potential visual impacts.*

As stated in Section 2.2 of the Final EIS, prior to selecting an elevated fixed guideway system, a variety of high-capacity transit options were evaluated during the Primary Corridor Transportation Project (1998—2002) and Alternatives Analysis. Options evaluated and rejected included an exclusively at-grade fixed-guideway system using light-rail or bus rapid transit (BRT) vehicles, as well as a mix of options consisting of both at-grade and grade-separated segments.

The Alternatives Screening Memorandum (DTS 2006a) recognized the visually sensitive areas in Kakaako and Downtown Honolulu, including the Chinatown, Hawaii Capital, and Thomas Square/Honolulu Academy of Arts Special District. To minimize impacts on historic resources, visual aesthetics, and surface traffic, the screening process considered 15 combinations of tunnel, at-grade, or elevated alignments between Iwilei and Ward Avenue. Five different alignments through Downtown Honolulu were advanced for further analysis in the Alternatives Analysis, including an at-grade portion along Hotel Street, a tunnel under King Street, and elevated guideways along Nimitz Highway and Queen Street (Figure 2-4).

The Alternatives Analysis Report (DTS 2006b) evaluated the alignment alternatives based on transportation and overall benefits, environmental and social impacts, and cost considerations. The report found that an at-grade alignment along Hotel Street would require the acquisition of more parcels and could potentially affect more burial sites than any of the other alternatives considered. The alignment with at-grade operation Downtown and a tunnel under King Street, was not selected because of the environmental effects, such as impacts to cultural resources, reduction of street capacity, and property acquisition requirements of the at-grade and tunnel sections, which would cost an additional $300 million.

The Project's purpose is "to provide high-capacity rapid transit" in the congested east-west travel corridor (see Section 1.7 of the Final EIS). The need for the Project includes improving corridor transit mobility and reliability. The at-grade alignment would not meet the Project's Purpose and Need because it could not satisfy the mobility and reliability objectives of the Project (see bullets below). Some of the technical considerations associated with an at-grade versus elevated alignment through Downtown Honolulu include the following:

- ***System Capacity, Speed, and Reliability***—*The short, 200-foot (or less) blocks in Downtown Honolulu would permanently limit the system to two-car trains to prevent stopped trains from blocking vehicular traffic on cross-streets. Under ideal operational circumstances, the capacity of an at-grade system could reach 4,000 passengers per hour per direction, assuming optimistic five minute headways. Based on travel forecasts, the Project should support approximately 8,000 passengers in the peak hour by 2030. Moreover, the Project can be readily expanded to carry over 25,000 in each direction by reducing the interval between trains (headway) to 90 seconds during the peak period. To reach a comparable system capacity, speed, and reliability, an at-grade alignment would require a fenced, segregated right-of-way that would eliminate all obstacles to the train's passage, such as vehicular, pedestrian, or bicycle crossings. Even with transit signal priority, the at-grade speeds would be slower and less reliable than an elevated guideway. An at-grade system would travel at slower speeds due to the shorter blocks, tight and short radius curves in places within the constrained and congested Downtown street network, the need to obey traffic regulations (e.g., traffic signals), and potential conflicts with other at-grade activity, including cars, bicyclists, and pedestrians. These effects mean longer travel times and far less reliability than a fully grade-separated system. None of these factors affects an elevated rail system. The elevated rail can travel at its own speed any time of the day regardless of weather, traffic, or the need to let cross traffic proceed at intersections.*
- ***Mixed-Traffic Conflicts***— *The Project will run at three minute headways. However, three-minute headways with an at-grade system would prevent effective coordination of traffic signals in the delicately balanced signal network in downtown Honolulu. A disruption of traffic signal cycle coordination every three minutes would severely affect traffic flow and capacity of cross-streets. Furthermore, there would be no option to increase the capacity of the at-grade rail system by reducing the headway to 90 seconds, which would only exacerbate the signalization problem. An at-grade system would require removal of two or more existing traffic lanes on affected streets. This effect is significant and would exacerbate congestion. Congestion would not be isolated to the streets that cross the at-grade alignment but, instead, would spread throughout Downtown.*

The Final EIS shows that the Project's impact on traffic will be isolated and minimal with the elevated rail, and, in fact will reduce system-wide traffic delay by 18 percent compared to the No Build Alternative (Table 3-14 in the Final EIS). The elevated guideway will require no removal of existing through travel lanes, while providing a reliable travel alternative. When traffic slows, or even stops due to congestion or incidents, the elevated rail transit will continue to operate without delay or interruption.

An at-grade light rail system with continuous tracks in-street would create major impediments to turning movements, many of which would have to be closed to eliminate a crash hazard. Even where turning movements are designed to be accommodated, at-grade systems experience potential collision problems. In addition, mixing at-grade fixed guideway vehicles with cars, bicyclists, and pedestrians presents a much higher potential for conflicts compared to grade-separated conditions. Where pedestrian and automobiles cross the tracks in the street network, particularly in areas of high activity (e.g., station areas or intersections), there is a risk of collisions involving trains that does not exist with an elevated system. There is evidence of crashes between trains and cars and trains and pedestrians on other at-grade systems throughout the country (e.g., Phoenix, Houston, LA). This potential would be high in the Chinatown and Downtown neighborhoods, where the number of pedestrians is high and the aging population presents a particular risk.

- ***Construction Impacts***—*Constructing an at-grade rail system could have more effects than an elevated system in a number of ways. The wider and continuous footprint of an at-grade rail system compared to an elevated rail system (which touches the ground only at discrete column foundations, power substations, and station accessways) increases the potential of utility conflicts and impacts to sensitive cultural resources. In addition, the extra roadway lanes utilized by an at-grade system would result in increased congestion or require that additional businesses or homes be taken to widen the roadway through Downtown. Additionally, the duration of short-term construction impacts to the community and environment with an at-grade system would be considerably greater than with an elevated system. Because of differing construction techniques, more lanes would need to be continuously closed for at-grade construction and the closures would last longer than with elevated construction. This would result in a greater disruption to business and residential access, prolonged exposure to construction noise, and traffic impacts.*

Because it is not feasible for an at-grade system through Downtown to move passengers rapidly and reliably without significant detrimental effects on other transportation system elements (e.g., the highway and pedestrian systems, safety, reliability, etc.), an at-grade system would have a negative system-wide impact that would reduce ridership throughout the system. The at-grade system would not meet the Project's Purpose and Need and, therefore, does not require further analysis.

Agricultural Land

The detailed discussion of zoning as the key implementing tool to turn land use planning policies into development is presented in the Honolulu High-Capacity Transit Corridor Project Land Use Technical Report (RTD 2008b) and summarized in Section 4.2.3 in the Final EIS. The technical report can be reviewed at the City and County of Honolulu DTS office or on the Project website (www.honolulutransit.org). The Project's focus is the construction and implementation of rail transit service, and that is what is covered in the Final EIS. However, as mentioned in Section 4.19.2 of the Final EIS, transit-oriented development (TOD) is expected to occur in project station areas as an indirect effect of the Project. The increased mobility and accessibility that the Project may provide will also increase the desirability and value of properties near the stations, thereby attracting new real estate investment nearby (in the form of TOD). In March 2009, the City Council approved and the Mayor of Honolulu signed Bill 10 (2008) (Ordinance 09-4), which defines the City's approach to TOD around fixed guideway stations. New zoning regulations will address parking standards, new density provisions, open space, and affordable housing. Financial incentives could include public-private partnerships, real property tax credits, and infrastructure financing. While the Project includes coordination with City and State agencies to encourage development of enhanced pedestrian and bicycle facilities and other land use changes near stations, the actual construction of such facilities and zoning changes are beyond the scope of the Project. The special districts also encourage public input into the design of TOD neighborhood plans to reflect unique community identities.

As stated in Section 4.2.3 of this Final EIS, the only farmlands that will be acquired for the Project are in the Ewa Plain. The Ewa Development Plan designates areas for dense development while preserving other areas for agriculture. A maximum of 80 acres of prime farmland and 8 acres of statewide-important farmlands will be acquired by the Project, of which 70 acres are actively cultivated. All of the affected properties designated as prime, unique, or of statewide importance and/or actively farmed are owned by individuals, corporations, or agencies that plan to develop them in conformance with the Ewa Development Plan.

The 88 acres of agricultural impacts include land for a maintenance and storage facility. One of the two alternatives for a maintenance and storage facility is in agricultural-related use (Aloun Farms). The other potential maintenance and storage facility is located near Leeward Community College and is the site of a former Navy fuel storage and delivery facility. The Leeward Community College location is the preferred location for the maintenance and storage facility, and the City has been working with the Navy to acquire it. If the Project can acquire this site, only about 47 acres of agricultural land designated prime or of statewide importance will be used for the Project.

As stated in Section 4.2.3 of the Final EIS the 2002 Census of Agriculture (USDA 2004) reported that there are more than 70,000 acres of agricultural land in cultivation on Oahu, including those designated as prime, unique, or of statewide importance. The displacement of agricultural lands as a result of the Project represents less than one-tenth of one percent of available agricultural land. Considering that the amount of affected farmland is such a small proportion of all agricultural lands on Oahu, including those designated as prime, unique, or of statewide importance, the effect will not be substantial and no mitigation is proposed.

The Waipahu area does not provide an available location for park-and-ride facilities to serve Ewa and Waianae traffic. Also, buses would be required to access the terminal station

through congested traffic on Farrington Highway. The savings from shortening the Ewa limit of the project corridor would not be sufficient to connect UH Manoa and Waikiki and would result in substantial traffic impacts in the Waipahu area. The Project serves areas within the Urban Growth Boundary defined by the Ewa Development Plan. By supporting development within the Urban Growth Boundary, further development pressure outside of the boundary will be reduced.

Air Quality

The regional pollutant burdens estimated in Table 4-15 of the Final EIS are based on Vehicle Miles Traveled (VMT) and Vehicle Hours Traveled (VHT) estimates throughout the study area. These estimates are based on regional planning models adopted by the OahuMPO. Emission rates were developed through the use of EPA's MOBILE6.2 Emission Factor program which takes into account vehicle mix, speed, meteorological conditions of the study area, and vehicular registration information. The Regional VMT model is reviewed by the State agencies for accuracy. Additional detail is available in the Transportation and Air Quality Technical Reports for the Project. The reports can be reviewed at the City and County of Honolulu Department of Transportation (DTS) Services office or on the Project website (www.honolulutransit.org). The analysis conducted for the EIS is based on the available information and Environmental Protection Agency (EPA) methodology. Since the analysis found there is no impact to air quality as a result of the Project, no mitigation is proposed.

The results shown in Table 4-15 of the Final EIS reflect mobile source emission burdens. As stated in the text, additional emissions will be generated due to the power requirements of the fixed guideway system. Table 4-21 in the Final EIS indicates that the Project will require 3 percent less overall energy as compared to the No Build Alternative. The Project is expected to result in decreased emissions generated on the roadways along with an increase in power source emissions resulting from fixed guideway energy consumption. However, the overall emission level for the Project is expected to be lower than the No Build Alternative because of anticipated reduced traffic congestion compared to the No Build Alternative (see Section 3.4.1 of the Final EIS).

As summarized in Table 4-21 in the Final EIS, operation of the Project is anticipated to reduce daily transportation energy demand by approximately 3 percent compared to the No Build Alternative. This decrease in energy demand is due to the reduction in VMT that occurs as a result of people switching from automobiles to the fixed guideway system and includes electrical energy required to operate the fixed guideway system.

VMT is the sum of the length of all highway segments multiplied by the number of vehicles that travel on them over the course of a day. The travel forecasting model performs that calculation each time the model is run. The differences in VMT between alternatives in the analyses are based on the differences in the numbers generated by the model. The same is generally true for VHT and VHD. VMT, VHT, and VHD forecasts have been developed using the travel demand model, which was calibrated against collected traffic and transit ridership information and then validated against current counts to be sure it properly represents travel activity in the transportation system (Section 3.2.1 of the Final EIS). An on-board transit survey was completed in December 2005 and January 2006, and the latest socioeconomic information available as of October 2008 was incorporated. Traffic counts were collected in 2005, 2007, and 2008. The model is based upon a set of realistic input assumptions regarding land use and demographic changes, such as updates to population and employment patterns that reflect

planned development on Oahu, between now and 2030 and expected transportation levels-of-service on both the highway and public transit system.

Energy

According to the U.S. Department of Energy, Transportation Energy Data Book, for the year 2006, passenger cars require 3,512 BTUs per passenger mile while transit trains require 2,784 BTUs per passenger mile, and transit buses require 4,235 BTUs per passenger mile. Based upon these figures, transit trains are a more energy efficient mode of transportation compared to passenger cars or transit buses. These figures are influenced by the load factor (persons per vehicle). The Honolulu system currently has the fourth highest load factor of any transit system in the United States and the highest load factor for any transit system without a rail transit system (Table 3-8 in the Final EIS).

Vehicle efficiency is factored into energy calculations based on overall fleet performance. In general, performance is assumed to improve over time consistent with fleet requirements imposed by federal law or set by individual states.

The Project will rely on Hawaiian Electric Company's (HECO) existing grid to provide propulsion for the trains and system operations for the trains. HECO is moving toward renewable energy generation. As that happens, the fixed guideway will also benefit from such new sources of energy. The 21 proposed stations and maintenance and storage facility will incorporate energy efficiency, alternative energy technologies, and other sustainable features into the design to the extent possible. This is being accomplished by including sustainability design criteria into the construction contract documents for the Project. Combined with the State's commitment to renewable electricity production, the system will substantially reduce the consumption of petroleum. Transportation energy use is evaluated in Section 4.11 of the Final EIS.

As shown in Section 4.11 of this Final EIS, the Project will result in reduced transportation energy consumption on Oahu. As stated previously, for at-grade operation, the system would require a fenced right-of-way with no crossings. It is not possible to construct such a system in many parts of the corridor, such as in the Downtown area.

Margins of Error

The preparation of the Draft and Final EISs follows the requirements of the Federal process established by NEPA, as applied by the FTA, and Chapter 343 of the Hawaii Revised Statutes. Further detail, including data assumptions, is available in the supporting technical reports for each of the discipline areas. The FTA-approved forecasting methodology is not a probabilistic analysis and does not inherently provide margins of error.

Cost

Chapter 6 of the Final EIS notes that fares are already subsidized for TheBus and are assumed to be for the Project. This is a typical practice for most transit systems throughout the country. The City Council's current policy is to recover between 27 and 33 percent of the annual cost of operations and maintenance from fares. It applies to all users, although reduced-cost fare categories are available to select groups, such as seniors and students.

Chapter 6 of the Final EIS notes that the capital costs of the Project will be paid for using the County General Excise Tax Surcharge authorized by the State Legislature and approved by the City Council, and Federal funding from the Federal Transit Administration. Farebox revenues are generally used to pay for ongoing operating and maintenance of the system.

The City Council's current policy is that 27 to 33 percent of operating and maintenance costs be recovered from farebox collections. As costs change, the City Council will adjust fares to meet that requirement. That means fares could rise or fall depending on conditions.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
Creation Date :	12/8/2008
Creator Affiliation :	
First Name :	Charles W
Last Name :	Smith
Business/Organization :	
Address :	4476 Kolohala Street
Alternative Preference :	
Apt./Suite No. :	
City :	Honolulu
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Telephone :	808-735-2173
Telephone Extension :	
Add to Mailing List :	Both
Submission Method :	Website
Other Submission Method :	
Submission Date :	12/08/2008
Submission Content/Notes :	Oahu taxpayers cannot afford this huge extra debt for steel rail. Hawaii's financial situation is in a dangerous crash.

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-331314

Mr. Charles W. Smith
4476 Kolohala Street
Honolulu, Hawaii 96816

Dear Mr. Smith:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall indentify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraph addresses your comments regarding the above-referenced submittal:

Section 6.5 of the Final EIS presents the financing for the Project. The analysis concludes that construction of the Project is financially feasible. Sufficient funds are expected from the County's General Excise and Use Tax (GET) Surcharge and Federal funds to cover the capital cost of these alternatives, including finance charges. All General Obligation debt is assumed to mature in FY 2023, corresponding to the last fiscal year of receipt of GET surcharge revenues. Throughout this period, the City is expected to maintain its current high credit rating.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
Creation Date :	1/24/2009
Creator Affiliation :	
First Name :	Daniel C
Last Name :	Smith
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Telephone :	808-951-4632
Telephone Extension :	
Add to Mailing List :	Both
Submission Method :	Website
Other Submission Method :	
Submission Date :	01/24/2009
Submission Content/Notes :	I have reviewed the Draft EIS. Although I am neither a transportation expert nor environmental expert, the Draft EIS makes sense. The costs and benefits -- economic and social -- look to be realistically stated. I have experienced the mass transit systems in New York, Atlanta, Paris, Sydney and the San Francisco Bay Area where I grew up. In those areas is clear that efficient mass transit contributes greatly to good quality of life. While I am disappointed that the Honolulu rail system will not initially go to Waikiki, UH Manoa and more places in the Eva Plain, the system is a good start. I applaud the political leadership that recognized that the perfect is the enemy of the good. It appears to me that the big risk in new mass transit is not being ambitious enough. Witness the cost of the BART extension to the San Francisco Airport versus the cost had it been in the original plan. I am pleased that the Honolulu Airport route appears to be on the way to adoption. I say that not just because I work at the airport, but especially because the airport route will also better serve the airport industrial area and Pearl Harbor which as inportant "industry." Let's get on with it!
Reply Requested :	Yes
Submission Type :	Draft EIS Comment

DEPARTMENT OF TRANSPORTATION SERVICES

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-334288

Mr. Daniel C. Smith
1816 Dole Street, B203
Honolulu, Hawaii 96822

Dear Mr. Smith:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

Your preference for the Airport Alternative has been noted. While each of the alternatives discussed in the Draft EIS includes trade-offs between benefits and impacts, the Airport Alternative from East Kapolei to Ala Moana has been selected as the Preferred Alternative as described above. As compared to the alternatives discussed in the Draft EIS, the Airport Alternative will carry the most passengers, provide the greatest transit-user benefits, and result in the fewest vehicle hours of delay. It will provide access to employment centers at Pearl Harbor Naval Base and Honolulu International Airport and will serve the Salt Lake neighborhood with connecting bus service. Of the three Build Alternatives addressed in the Draft EIS, the Airport Alternative will have slightly less impacts to the natural and built environment analyzed in the Draft EIS. During the public comment period on the Draft EIS, the public overwhelmingly supported the Airport Alternative. Of the comments that specifically supported one of the alternatives, more than 75 percent were in support of the Airport Alternative. For more

information this selection is discussed in Section 2.4 of the Final EIS. Since publication of the Draft EIS, design has been advanced, further analysis has been completed, and information has been added in response to comments on the Draft EIS and agency coordination. The Final EIS discusses the process that was used to select the Preferred Alternative, how comments were considered in the decision-making process, impacts and mitigation commitments.

The Project has logical termini at East Kapolei and Ala Moana Center and independent utility from any extensions that may be constructed in the future. The proposed future extensions to West Kapolei, Salt Lake Boulevard, Waikiki, and UH Manoa are discussed in the cumulative impacts sections of Chapters 3 and 4 of this Final EIS. The future extensions are not part of this Project; thus, they are not required to be evaluated under Chapter 343 of the Hawaii Revised Statutes and NEPA. Under NEPA, environmental analysis is only required when there is a proposed action by a Federal agency. Here, because the future extensions are not proposed for implementation at this time, they are not part of the Project studied in this Final EIS. It would be premature to undertake an environmental analysis of the extensions (beyond the cumulative impacts analysis) because they are not part of the proposed action to be taken by the City and FTA. If the future extensions are proposed for implementation in the future, environmental analysis of the extensions and appropriate alternatives will be undertaken at that time. Additional extensions could be planned or considered over time.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Garry P. Smith
91-321 Pupu Place
Ewa Beach, HI 96706

Dec. 7, 2008

City Dept. of Transportation
Attn: DEIS Comments

Mr. Wayne Yoshioka
Director Department of Transportation Services
City and County of Honolulu
650 South King Street Third Floor
Honolulu, Hi 96813

Dear Sir,

Please accept this as a comment concerning the DEIS on the proposed Rail Transit System being considered by the City and County of Honolulu.

1. The DEIS shows that the proposed system bypasses the most heavily congested area on the Leeward Coast-Ewa Beach. The purported purpose of the entire rail system is to provide an alternative for commuters coming from congested areas. The beginning of the rail system is more than 3.7 miles from Ewa Beach requiring us to drive or bus over heavily congested Ft. Weaver Rd. or the yet to be built North/South road. During peak traffic hours it can take 45 minutes to drive from Ewa Beach to H1 Freeway, even with the widening of Ft. Weaver Rd. and building of North/South Rd. it will take 30 minutes from Ewa Beach (end of Ft. Weaver Rd.) to the train station. Development in Ewa Beach will be far greater than in Kapolei or Waipahu yet these communities have their own station. Why does the DEIS not make provisions for including a station in the heart of the traffic congestion making us wait 15-20 years for a Phase II that might not ever be built?

2. The DEIS discloses that a train station is being built in a vacant field that has been bought by developer D R Horton to develop an 11,000 home community called Hoopili. The station is expected to provide significant enhancements to this developers project at great cost to the city and federal governments. Why is the city giving preference to a developer in assigning a station to this location while ignoring developments all ready built or in immediate need of transportation services?

Thank you for your response to my comments.

Garry P. Smith

RECEIVED
2008 DEC 9 P12:34
DIRECTOR'S OFFICE
CITY & CO. OF HONOLULU
DEPT. OF TRANSPORTATION SERVICES

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010 RT12/08-290818R

Mr. Garry P. Smith
91-321 Pupu Place
Ewa Beach, Hawaii 96706

Dear Mr. Smith:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

Several fixed guideway alignments were studied during the Alternatives Analysis, including an alignment along Fort Weaver Road. However, on December 22, 2006, the City Council selected an alignment that extends from Kapolei to UH Manoa with a branch to Waikiki as the Locally Preferred Alternative. Ordinance 07-001 made the City Council's selection law on January 6, 2007. City Council Resolution 07-039 defined the financially feasible Project as extending from East Kapolei to Ala Moana via Salt Lake Boulevard. By Resolution 08-261, the City Council altered a segment of the alignment to serve the Airport rather than Salt Lake Boulevard. While there may still be interest in an extension to Ewa Beach in the future, it is not included in the current project. The most direct access to the project would be to stations in East Kapolei or UH West Oahu along Kualaka'i Road (North-South Road), which will still provide an advantage to Ewa Beach residents by avoiding the severecongestion between the Waiawa interchange and downtown Honolulu..

According to the current plan, a station is located in the future Ho'opili project. The intent of this decision is to support the development of the Kapolei second city as the primary future growth area on the island. This is consistent with the Purpose and Need of the Project described in Section 1.8.3 of the Final EIS, to Improve Access to Planned Development to Support City Policy to Develop a Second Urban Center.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
Creation Date :	12/16/2008
Creator Affiliation :	
First Name :	kenny
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Telephone :	
Telephone Extension :	
Add to Mailing List :	Email
Submission Method :	Website
Other Submission Method :	
Submission Date :	12/16/2008
Submission Content/Notes :	did you ever look at the bay area of BART system? if you did not see the system you need to look at theres ok please. you will like it.
Reply Requested :	Yes
Submission Type :	Draft EIS Comment
FOIA (Freedom of Information Request) Request :	
FOIA Referral Date :	
FOIA Response Date :	

DEPARTMENT OF TRANSPORTATION SERVICES

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-332005

Mr. Kenny Smith
3178 T Street
Sacramento, California 95816

Dear Mr. Smith:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall indentify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraph addresses your comments regarding the above-referenced submittal:

To answer your question, yes, experience from a broad range of transit systems worldwide, including BART in the San Francisco Bay Area, has been used in the development of this Project.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
Creation Date :	1/19/2009
Creator Affiliation :	
First Name :	kenny
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Email :	kenny2154@att.net
Telephone :	
Telephone Extension :	
Add to Mailing List :	Email
Submission Method :	Website
Other Submission Method :	
Submission Date :	01/19/2009
Submission Content/Notes :	i just wish you can be a little bit more open with me when it comes to the service you are trying to start up on oahu hi.
Reply Requested :	Yes
Submission Type :	Draft EIS Comment
FOIA (Freedom of Information Request) Request :	
FOIA Referral Date :	
FOIA Response Date :	

DEPARTMENT OF TRANSPORTATION SERVICES

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-334010

Mr. Kenny Smith
3178 T Street
Sacramento, California 95816

Dear Mr. Smith:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

The Project is described in Chapter 2 of Final EIS, which is available on the Project website at www.honolulutransit.org. The Project has also continually provided information to the public. As new information about the project arises, this information will also be made available.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
Creation Date :	1/28/2009
Creator Affiliation :	
First Name :	kenny
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City :	sacramento
State :	CA
Zip Code :	95816
Email :	kenny2154@att.net
Telephone :	
Telephone Extension :	
Add to Mailing List :	Email
Submission Method :	Website
Other Submission Method :	
Submission Date :	01/28/2009
Submission Content/Notes :	i just looked at the honolulu advertiser paper did not have much in it about the plan. so what is going on over there? any way. so is the air port route is a go?. see the paper did not say much about it. so what is going on. is the salt lake route on hold?. do get back to me with some answer and you could send me your paper on the rail please. i like it.
Reply Requested :	Yes
Submission Type :	Draft EIS Comment
FOIA (Freedom of Information Request) Request :	
FOIA Referral Date :	
FOIA Response Date :	

DEPARTMENT OF TRANSPORTATION SERVICES

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

May 21, 2010

RT9/09-334332

Mr. Kenny Smith
3178 T Street
Sacramento, California 95816

Dear Mr. Smith:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address comments regarding the above-referenced submittal:

In answer to your comments, the Airport Alternative from East Kapolei to Ala Moana Center has been selected as the Preferred Alternative. The identification of the Airport Alternative as the Preferred Alternative was made by the City to comply with FTA's NEPA regulations that state that the Final EIS should focus on the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative, public input on the Draft EIS, and City Council Resolution 08-261 identifying the Airport Alternative as the Project. The selection of the Airport Alternative is described in Chapter 2 of this Final EIS. The discussion of the alternatives considered is included in Chapter 2 of this Final EIS and the Alternatives Analysis. As discussed in Section 3.4.2 of this Final EIS, the Airport Alternative will carry the most passengers with 116,000 daily passengers and 282,500 daily trips in 2030, thereby resulting in the greatest transit-user benefits. The Airport Alternative will also result in the fewest vehicle miles traveled and vehicle hours of delay, as well as provide

access to major employment areas, including Honolulu International Airport, that will have substantially greater ridership than the other alternatives considered.

The Project has logical termini at East Kapolei and Ala Moana Center and independent utility from any extensions that may be constructed in the future. The proposed future extensions to West Kapolei, Salt Lake Boulevard, Waikiki, and UH Manoa are discussed in the cumulative impacts sections of Chapters 3 and 4 of the Final EIS. The future extensions are not part of this Project; thus, they are not required to be evaluated under Chapter 343 of the Hawaii Revised Statutes and NEPA. Under NEPA, environmental analysis is only required when there is a proposed action by a Federal agency. Here, because the future extensions are not proposed for implementation at this time, they are not part of the Project studied in this Final EIS. It would be premature to undertake an environmental analysis of the extensions (beyond the cumulative impacts analysis) because they are not part of the proposed action to be taken by the City and FTA. If the future extensions are proposed for implementation in the future, environmental analysis of the extensions and appropriate alternatives will be undertaken at that time. A copy of the Final EIS has been included with this letter. In addition, copies are available on the project website at www.honolulutransit.org.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Issuance of the Record of Decision under NEPA and acceptance of the Final EIS by the Governor of the State of Hawaii are the next anticipated actions and will conclude the environmental review process for this Project.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
Creation Date :	1/2/2009
Creator Affiliation :	
First Name :	MIKE
Last Name :	smith
Business/Organization :	
Address :	103 kahako street
Alternative Preference :	
Apt./Suite No. :	B
City :	kailua
State :	HI
Zip Code :	96734
Email :	poolguy@hawaii.rr.com
Telephone :	262-4226
Telephone Extension :	
Add to Mailing List :	None
Submission Method :	Website
Other Submission Method :	
Submission Date :	01/02/2009
Submission Content/Notes :	I read, a few weeks ago, of a suggestion to start the rail system in Pearl City and develop it to down town. This would give the fastest traffic relief and return on the investment. Believe this idear was nixed because the maintenance yard will be located at the west end of the track in Kapolei. A thaught would be to still start and fully develop the system, Pearl City to down town, while symultaneously develop the yard and track only from Kapolei to Pearl City. Have cake and eat it too!

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, 3RD FLOOR
HONOLULU, HAWAII 96813
Phone: (808) 768-8305 • Fax: (808) 768-4730 • Internet: www.honolulu.gov

MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010 RT9/09-332356

Mr. Mike Smith
103 Kahako Street
Apartment B
Kailua, Hawaii 96734

Dear Mr. Smith:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraph addresses your comments regarding the above-referenced submittal:

As described in Section 2.5.10 of the Final EIS, to support phased opening of the system, the first construction phase must be connected to a maintenance and storage facility, which requires considerable land. The first phase of the Project must be connected to the maintenance and storage facility because, in addition to maintenance of equipment and ongoing operations, the maintenance and storage facility houses the main control center for the entire Project, and the required testing and operation of the system could not be completed without access to it. No location has been identified closer to Downtown with sufficient available land to construct a maintenance and storage facility. The Project will be constructed in phases to accomplish the following:

- *Match the anticipated schedule for right-of-way acquisition and utility relocations*

- *Reduce the time that each area will experience traffic and community disturbances*
- *Allow for multiple construction contracts with smaller contract size to promote more competitive bidding*
- *Match the rate of construction to what can be maintained with local workforce and resources*
- *Balance expenditure of funds to minimize borrowing*

The portion of the corridor Ewa of Pearl Highlands is less developed than the areas Koko Head. As a result, right-of-way can be obtained more quickly and overall project construction can begin earlier, resulting in lower total construction costs. Construction is planned to continue uninterrupted Koko Head from Pearl Highlands to Aloha Stadium, then Kalihi, and finally to Ala Moana Center. Your suggestion to build the full system is appealing, but not within the financial range of the Project's current revenue sources.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

December 5, 2008

To: Mr. Wayne Yoshioka, City director of transportation

From: Pam Smith, 91-321 Pupu Place, ewa beach 96706

I want to make a comment on the Draft environmental impact statement up for public review at this time. I would like this comment to be answered.

My comment is that with the ~~city~~ state and national economy sputtering and tax revenues being reduced dramatically the original funding for the rail system won't be enough to now build it. Property taxes are going to go down so the city can't tap into that. The state won't raise the Get another ½% so where is the city going to get the difference between the original GET revenue and the new forecasted lower revenue?

In this same area, if property taxes go down because valuations have gone down, how will the city pay for the operating and maintenance expenses on this system which will be substantial?

Please respond with your answers:

Pam Smith

P.O. Box 2242

Ewa Beach, Hi 96706

392-5559

cc Ted Matthews
Cc Linda Lingle

RECEIVED
08 DEC 9 P12:34
CITY MANAGER'S OFFICE
DEPT. OF TRANSPORTATION SERVICES

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, 3RD FLOOR
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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

May 21, 2010

RT9/09-333916

Ms. Pam Smith
P.O. Box 2242
Ewa Beach, Hawaii 96706

Dear Ms. Smith:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraph addresses comments regarding the above-referenced submittal:

Section 6.3 of the Final EIS describes the financial resources anticipated to be needed to pay for the capital cost of the Project and the City's overall public transportation system. Capital costs of the Project, including finance charges, are expected to be fully paid for by a combination of FTA Section 5307 and FTA Section 5309 New Starts Funds from the Federal government and revenues from the County General Excise and Use Tax Surcharge levied from 2007 through 2022 on Oahu. The analysis takes the current economic downturn into account. Section 6.4 of the Final EIS describes the funding sources to pay for ongoing operations and maintenance costs associated with maintaining the transit system in a state of good repair. Operating and maintenance costs will be paid for from the same sources currently used for TheBus: Federal funding, fare revenues, and subsidies from the City's General and Highway Funds. Section 4.19 of the Final EIS discusses the potential indirect economic effects of new development and redevelopment near the Project alignment and around stations.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Issuance of the Record of Decision under NEPA and acceptance of the Final EIS by the Governor of the State of Hawaii are the next anticipated actions and will conclude the environmental review process for this Project.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Rev. & Mrs. Samuel M. Smith and Family
P. O. Box 1015
Kailua, HI 96734-1015
808-230-8683 or cel 351-2753

November 27, 2008

HONOLULU COMMON SENSE TRANSIT
Rev & Mrs Samuel M. Smith & Family
P. O. Box 1015
Kailua, HI 96734 U. S. A.

WEB: http://www.followersofjesuschrist.org
email: info@up-way-publications.org

URGENT URGENT URGENT

Mayor Mufi Hannemann
Honolulu Hale
530 S. King St.
Honolulu, HI 96813

Dear Mayor Hannemann:

This is to certiufy to you that **EMINENT DOMAIN SUITS ARE UNNECESSARY,** A MAJOR WASTE OF TIME AND TAXPAYER MONEY.

I SHALL volunteer to assist every homeowner and business affected by the proposed EMINENT DOMAIN to provide right-of-way for your elevated rail system and to testify in court to STOP plans for such an elevated system.

You know that I have been urging MASS TRANSIT NOW since 1983 and did all I could to help influence voters to vote FOR the steel-on-steel rail system. **Now, I will work TWICE AS HARD to get you, Mayor Mufi, and City Council to reconsider the ONLY LOGICAL AND COMMON SENSE SYSTEM for the 21st Century — 100 % UNDERGROUND steel on steel RAIL.** I will also be bringing pressure to bear from the State Legislature and from Washington. I have already contacted Senator Inouye who, I am sure doubtless voted for funding for the Washington DC UNDERGROUND metro system, and I am urging him to tie Federal funding to UNDERGROUND construction similar to that of the Chunnel. (Please visit http://www.affordableworldtravelandtours.com/honolulucommonsensetransit/honolulucommonsensetransit.html.)

I am told, the State of Hawaii may already have used such equipment as was used in the ***Chunnel*** in building the H-3 tunnels and may still own it.

In past correspondence, I have already given you well over 20 SOLID, Valid reasons why UNDERGROUND will be less expensive and because only Environmental Impact studies/statements, which would need little modification from your already existing one, and the signing of right-of-way agreements with the State and construction contractors, construction could begin even by the end of this December. If you insist on present elevated routing, Eminent Domain lawsuits and related court injunctions can delay even the signing of contracts for at least many months and possibly several years. This, of course, will cost hundreds of thousands of dollars in additional costs between attorney fees and increased land value, to say nothing of the cost to commuters who will have yet a longer wait for significant traffic congestion relief.

Every argument AGAINST UNDERGROUND RAIL can easily be answered by citing the many instances in which mass transit and even major rail tunnels are beneath the water table, in more earthquake prone zones than Oahu, bored through even granite rock (which is MUCH harder than lava!) as well as through clay and softer rock.

The technology of a huge machine like bored the ***Chunnel*** makes arguments about the construction

problems of the local sewer system, which uses surface construction methods and is relatively shallow totally nonsense. Likewise, reference to the "Big Dig" fiasco in Boston, where surface dig and refill methods were used is not an option. At the VERY BUSIEST TRAFFIC HOUR, the *Chunnel*-type boring/tunnel building equipment could be boring 40 or 50 feet below the highway or street and nobody would even know that their stop and go surface traffic was immediately above the actively boring equipment.

I do agree that although your proposed elevated rail system doesn't look too bad as an eyesore, and would certainly get people from Point A to Point B far faster and cheaper than by their own cars, even factoring in the taxes to build the system. I would love to show you my copy of the History Channel's Modern Marvels: ***The Chunnel*** [http://store.aetv.com/html/product/index.jhtml?id=42739] DVD so you can see for yourself how practical the underground system would be.

I will not here take the time to revisit the many reasons **for UNDERGROUND** AS AGAINST ELEVATED OR SURFACE, NOR THE REASONS WE URGENTLY NEED MASS TRANSIT NOW. I am leaving most of those reasons as previously mailed to you below. I will also be mailing copies of this letter to you to all possible news media in an effort to raise public consciousness of how many delays and how much additional costs the elevated or surface routing would cause and the total practicality of building entirely underground, as well as several safety factors in which UNDERGROUND is safer.

For a better Honolulu for everyone,

Samuel M. Smith

June 15, 2008 letter is below and includes most of October 25, 2006 letter.

On October 25, 2006, I wrote the below letter to you and you responded and even sent me and my family a Thanksgiving greeting. You also had the Transit Study people send me a great and well-done DVD about the urgency of the need for Mass Transit ASAP. I therefore invested in a copy of the History Channel's Modern Marvels: ***The Chunnel*** [http://store.aetv.com/html/product/index.jhtml?id=42739] DVD which I had intended to get into the hands of then Transportation Chair Nestor Garcia, but somehow never seemed to be able to get it to him.

However, I would rather fight AGAINST the above ground rail than see the city make that major mistake. I HAVE SIGNED THE STOP RAIL NOW petition BUT I WILL DO ALL I CAN TO GET a YES vote to BUILD an UNDERGROUND rail system.

And I call your attention to the MAJOR money being spent by someone to advertise AGAINST ANY rail and ask WHO WOULD SPEND THAT KIND OF MONEY TO STOP RAIL? Now who will benefit from stopping Rail? Petroleum interests, Automobile dealers, Parking lot operators, Garage Mechanics. Now Insurance companies will of course seem neutral in the matter, but because higher accident rates will justify higher premiums, they might also benefit by stopping rail.

Please look at the advantages I have already listed in my October 25, 2006 letter below and factor in one more thing that I had not thought about before. IF A 100 PERCENT UNDERGROUND SYSTEM WERE TO BE BUILT THERE WOULD BE MANY THOUSANDS OF CUBIC YARDS OF FILL TO SAFELY EXTENT THE SHORELINE IN A PLANNED LOCATION AND THAT LAND COULD THEN BE SOLD AS WATERFRONT PROPERTY TO OFFSET MUCH OF THE COST OF BUILDING THE RAIL SYSTEM.

And again, in June 2008, I remind you that the construction tie-ups of an above ground system would make present traffic tie-ups look like nothing.

I also remind you of land acquisition costs if you do not build beneath existing roadways using EXISTING equipment that can operate there with NO DISRUPTION of the traffic above. You will have costly and divisive *eminent domain* suits to file for above ground rights of way, court delays and again, who will benefit? Petroleum interests, Automobile dealers, Parking lot operators, so of coursre they

are willing to spend BIG MONEY to stop rail and if YOU, Mayor, do not use my arguments linked to those showing the necessity of Mass Transit that were on the DVD you had the Transit Study people send me, the MISINFORMATION people will both get the issue on the Ballot, but will also get rail voted down. What a tragedy for EVERYONE!

Please, Mayor, I beg of you, reconsider and reevaluate 100 percent UNDERGROUND steel on steel rail. If you persist in the above ground FOOLISHNESS, I will SADLY be adding my voice to the ANTI Rail voices. I believe that at the rate it is now going, the petition will get more than enough signatures to get the issue on the ballot and with the misinformation already being promoted, it will lose. **Who is paying the "volunteers" to stand outside Post Offices and other public places with petitions?** I believe it is the Petroleum interests, Automobile dealers, Parking lot operators, etc.

Sincerely,

Rev. Samuel M. Smith

October letter follows:

On the 8:00 AM news on KHON TV2, a member of the Kakaako Neighborhood Board correctly and wisely spoke to the issue of the horrendous traffic tie-ups on Kapiolani Boulevard as a result of sewer work and lane closures. I wonder that neither you nor others involved in planning the URGENTLY NEEDED Mass Transit System have glibly overlooked this aspect of building an above ground metro system. Equipment is already in storage that has been tested and very successfully used to build the "Chunnel" between England and France and the BART in California's San Francisco Bay Area. The BART in particular has also already been tested by earthquake, so the evidence is clear that above ground Metro proponents' argument about water, rock and earthquake hazards to the underground system is a smokescreen.

I have previously contacted you on this subject and gave 17 good, valid, common-sense reasons for MASS TRANSIT NOW. If I repeat a few from this new angle please forgive me. (I would welcome a face-to-face debate on the issue before City Council and the media.)

While I URGENTLY support Mass Transit, I equally or with even greater emphasis OPPOSE an above ground system for the following reasons in order of importance:

1. MASSIVE traffic tie-ups during construction that are unavoidable for this type of construction.

2. Delays caused by battles over ***eminent domain*** rights and causes to acquire the necessary rights-of way.

3. Cost of right of way acquisition.

4. The already protested blockage of portions of Oahu scenery by the additional structures.

Benefits of the UNDERGROUND system are:

1. Construction machinery is available capable of boring the tunnels, creating a steel-reinforced concrete tunnel tube with **NO DISRUPTION OF SURFACE TRAFFIC** or buildings above. Spoil dirt is hauled out at the ends and concrete, steel and other materials needed by the machine are hauled in from the ends.

2. AND 3. **No long court battles over *Eminent Domain*** rights because virtually all needed right of way already exists beneath present highways, streets and roads. Only terminals or stations might require acquisition of land. Costs for hiring professional tunnel builders and their machinery easily offset by **LACK OF LAND ACQUISITION COST.**

4. No permanent above ground structures obstructing tourist (or our) view of our Native Oahu beauty.

Please do not overlook the URGENT need folks in the entire Leeward area have for MASS TRANSIT NOW!!! But at the same time, please don't overlook the awful gridlock of traffic that buiding an above ground system will unavoidably create. As I have pointed out before, EVERY taxpayer in Leeward Oahu has ALREADY paid FAR more in fuel costs, lost time and vehicle repair and vehicle replacement than the relatively small proposed tax increase that would have already had Mass Transit in place if misguided voters had not rejected the option several years ago.

Finally, our State and Oahu leaders are coming close to agreement that we really DO need MASS TRANSIT NOW. The widening of existing highways and addition of zipper lanes is almost counter productive as more land is gobbled and the fuel consumption and lost time situation is only slightly affected. What about the High Speed Ferry proposal to zoom people from Barbers Point or wherever else in that area that such a landing is decided upon. That is still subject to closing if storm conditions arise, making an even more problematic situation for Leeward residents on such days as people planning to use the ferry suddenly discover at the last minute that they will either have to drive, call a cab or catch a bus. This, I think, is something those pushing for the ferry beat idea seem to forget.

And if a Disneyland style monorail is built, consideration must be given to the disruption of traffic during the construction phase. This, in addition to the fact that it cannot help but at least partially block scenic views. And, since the VAST majority of those most urgently needing MASS TRANSIT NOW are residents needing to get to work on time, they have seen the sights and simply want to leave home as late as possible to arrive at work on time and return home or whatever else they must do with the least lost time commuting from their workplace to home, the UNDERGROUND rail system makes the MOST SENSE. With modern technology, tunnel boring machines such as built the England to France Chunnel and other similar equipment now in storage awaiting a time and place to be used again can easily build earthquake resistant and waterproof systems with only minimal surface support, minimal traffic disruption, no need for additional land, since they can be built beneath existing freeways and other rights-of-way.

For any who question the practicality of and the advantages to the UNDERGROUND mass transit systems for the unique conditions and needs of Oahu and Honolulu, I suggest you secure copies of the titles, Modern Marvels: **Tunnels** [http://store.aetv.com/html/product/index.jhtml?id=12211] or Modern Marvels: **The Chunnel** [http://store.aetv.com/html/product/index.jhtml?id=42739] and Modern Marvels: **The City Beneath Our Feet** [http://store.aetv.com/html/product/index.jhtml?id=42738]. These in order of their significance to Honolulu. Or, I can loan you my copy.

I would welcome a face-to-face debate on the issue before City Council and the media.

Rev. Samuel M. Smith

copy to All News Media,

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010 RT12/08-289472R

Mr. Samuel M. Smith
P.O. Box 1015
Kailua, Hawaii 96734-1015

Dear Mr. Smith:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

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Your comments have been noted. Tunnel options were evaluated and eliminated during the Alternatives Analysis phase of the Project because they would not have been financially feasible. Tunnel costs are two to three higher than elevated systems and the funding is not available for the additional cost.

Section 3.5 of Chapter 3 of the Final EIS discusses the effects of construction on the community and proposes mitigation to help reduce those effects. While there is likely to be some inconvenience during construction of such a major project, maintenance of traffic (MOT) and transit mitigation (TMP) plans are required of all contractors to ensure roadways are accessible and usable during construction and that buses can continue to operate. Property Acquisition, Visual and noise effects of the alternatives are discussed in Sections 4.4, 4.9 and 4.10, respectively, of Chapter 4 of the Final EIS.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

HONOLULU COMMON SENSE TRANSIT
REV. & MRS. SAMUEL M. SMITH & FAMILY
P. O Box 1015
KAILUA, HI 96734-1015 U. S. A.
(808) 230-8698 PHONE OR FAX

RECEIVED
2008 DEC -8 A 9:26
CITY COUNCIL
HONOLULU, HAWAII

December 5, 2008

City Councilman Charles D'jou
Honolulu Hale
530 S. King St.
Honolulu, HI 96813
Honolulu, Hawaii 96813.

Dear Councilman D'Jou:

I watched your comments on the rail system start point being more sensible from downtown outward and if they insist on the DUMB elevated system, you are completely right. More from the standpoint of traffic being heaviest in the downtown and outward area and daily getting worse on average, though than from having it available for use because until a certain length of trackage is in place there is no real value to puttingtrains on the trac\k and running them.

But, since you have public exposure, maye I can show you the common sense that the entire system should be underground. I have between 20 and 25 good, strong, valid reasons why it MUST be built entirely or almost entirely UNDERGROUND.

I am too busy to take the time at the moment to separate and reorganize the letters with the facts into a more concise form, but if you will read the reasons that follow and which I have already been pushing for since 1983, you will see that a great deal of both time and money can be saved and a much better, more safe and secure system achieved. Please note on the envelope and on my web page the Washington DC underground rail system.

Before you begin to make excuses why UNDERGROUND won't work for Honolulu, be aware that I answer EVERY objection to underground and show they are based on misinformation. A totally Modern Marvel technology which has already been used and for which the equipment is available, would begin at the outer ends and work toward the middle BENEATH existing City and State rights of way and could be actively working 50 or so feet below the busiest freeway at the busiest hour without traffic above having any idea what was below them.

It will be to your own benefit and the benefit of every resident of Oahu who commutes frequently, whether from Windward of Leeward, because traffic congestion costs everyone on the island time, fuel and wages, to say nothing of time at home with families or just "kicking back."

Plain common sense will tell you what I am pointing out is correct and the only sensible way to really solve the problem.

For a better Oahu for all of us,

Rev. Samuel M. Smith

Rev. & Mrs. Samuel M. Smith and Family
P. O. Box 1015
Kailua, HI 96734-1015
808-230-8683 or cel 351-2753

November 27, 2008

URGENT URGENT URGENT

Mayor Mufi Hannemann
Honolulu Hale
530 S. King St.
Honolulu, HI 96813

Dear Mayor Hannemann:

This is to certiufy to you that **EMINENT DOMAIN SUITS ARE UNNECESSARY,** A MAJOR WASTE OF TIME AND TAXPAYER MONEY.

I SHALL volunteer to assist every homeowner and business affected by the proposed EMINENT DOMAIN to provide right-of-way for your elevated rail system and to testify in court to STOP plans for such an elevated system.

You know that I have been urging MASS TRANSIT NOW since 1983 and did all I could to help influence voters to vote FOR the steel-on-steel rail system. **Now, I will work TWICE AS HARD to get you, Mayor Mufi, and City Council to reconsider the ONLY LOGICAL AND COMMON SENSE SYSTEM for the 21st Century — 100 % UNDERGROUND steel on steel RAIL.** I will also be bringing pressure to bear from the State Legislature and from Washington. I have already contacted Senator Inouye who, I am sure doubtless voted for funding for the Washington DC UNDERGROUND metro system, and I am urging him to tie Federal funding to UNDERGROUND construction similar to that of the Chunnel. (Please visit http://www.affordableworldtravelandtours.com/honolulucommonsensetransit/honolulucommonsensetransit.html.)

I am told, the State of Hawaii may already have used such equipment as was used in the ***Chunnel*** in building the H-3 tunnels and may still own it.

In past correspondence, I have already given you well over 20 SOLID, Valid reasons why UNDERGROUND will be less expensive and because only Environmental Impact studies/statements, which would need little modification from your already existing one, and the signing of right-of-way agreements with the State and construction contractors, construction could begin even by the end of this December. If you insist on present elevated routing, Eminent Domain lawsuits and related court injunctions can delay even the signing of contracts for at least many months and possibly several years. This, of course, will cost hundreds of thousands of dollars in additional costs between attorney fees and increased land value, to say nothing of the cost to commuters who will have yet a longer wait for significant traffic congestion relief.

Every argument AGAINST UNDERGROUND RAIL can easily be answered by citing the many instances in which mass transit and even major rail tunnels are beneath the water table, in more earthquake prone zones than Oahu, bored through even granite rock (which is MUCH harder than lava!) as well as through clay and softer rock.

The technology of a huge machine like bored the ***Chunnel*** makes arguments about the construction

problems of the local sewer system, which uses surface construction methods and is relatively shallow totally nonsense. Likewise, reference to the "Big Dig" fiasco in Boston, where surface dig and refill methods were used is not an option. At the VERY BUSIEST TRAFFIC HOUR, the *Chunnel*-type boring/tunnel building equipment could be boring 40 or 50 feet below the highway or street and nobody would even know that their stop and go surface traffic was immediately above the actively boring equipment.

I do agree that although your proposed elevated rail system doesn't look too bad as an eyesore, and would certainly get people from Point A to Point B far faster and cheaper than by their own cars, even factoring in the taxes to build the system. I would love to show you my copy of the History Channel's Modern Marvels: ***The Chunnel*** [http://store.aetv.com/html/product/index.jhtml?id=42739] DVD so you can see for yourself how practical the underground system would be.

I will not here take the time to revisit the many reasons **for UNDERGROUND** AS AGAINST ELEVATED OR SURFACE, NOR THE REASONS WE URGENTLY NEED MASS TRANSIT NOW. I am leaving most of those reasons as previously mailed to you below. I will also be mailing copies of this letter to you to all possible news media in an effort to raise public consciousness of how many delays and how much additional costs the elevated or surface routing would cause and the total practicality of building entirely underground, as well as several safety factors in which UNDERGROUND is safer.

For a better Honolulu for everyone,

Samuel M. Smith

June 15, 2008 letter is below and includes most of October 25, 2006 letter.

On October 25, 2006, I wrote the below letter to you and you responded and even sent me and my family a Thanksgiving greeting. You also had the Transit Study people send me a great and well-done DVD about the urgency of the need for Mass Transit ASAP. I therefore invested in a copy of the History Channel's Modern Marvels: ***The Chunnel*** [http://store.aetv.com/html/product/index.jhtml?id=42739] DVD which I had intended to get into the hands of then Transportation Chair Nestor Garcia, but somehow never seemed to be able to get it to him.

However, I would rather fight AGAINST the above ground rail than see the city make that major mistake. I HAVE SIGNED THE STOP RAIL NOW petition BUT I WILL DO ALL I CAN TO GET a YES vote to BUILD an UNDERGROUND rail system.

And I call your attention to the MAJOR money being spent by someone to advertise AGAINST ANY rail and ask WHO WOULD SPEND THAT KIND OF MONEY TO STOP RAIL? Now who will benefit from stopping Rail? Petroleum interests, Automobile dealers, Parking lot operators, Garage Mechanics. Now Insurance companies will of course seem neutral in the matter, but because higher accident rates will justify higher premiums, they might also benefit by stopping rail.

Please look at the advantages I have already listed in my October 25, 2006 letter below and factor in one more thing that I had not thought about before. IF A 100 PERCENT UNDERGROUND SYSTEM WERE TO BE BUILT THERE WOULD BE MANY THOUSANDS OF CUBIC YARDS OF FILL TO SAFELY EXTENT THE SHORELINE IN A PLANNED LOCATION AND THAT LAND COULD THEN BE SOLD AS WATERFRONT PROPERTY TO OFFSET MUCH OF THE COST OF BUILDING THE RAIL SYSTEM.

And again, in June 2008, I remind you that the construction tie-ups of an above ground system would make present traffic tie-ups look like nothing.

I also remind you of land acquisition costs if you do not build beneath existing roadways using EXISTING equipment that can operate there with NO DISRUPTION of the traffic above. You will have costly and divisive *eminent domain* suits to file for above ground rights of way, court delays and again, who will benefit? Petroleum interests, Automobile dealers, Parking lot operators, so of coursre they

are willing to spend BIG MONEY to stop rail and if YOU, Mayor, do not use my arguments linked to those showing the necessity of Mass Transit that were on the DVD you had the Transit Study people send me, the MISINFORMATION people will both get the issue on the Ballot, but will also get rail voted down. What a tragedy for EVERYONE!

Please, Mayor, I beg of you, reconsider and reevaluate 100 percent UNDERGROUND steel on steel rail. If you persist in the above ground FOOLISHNESS, I will SADLY be adding my voice to the ANTI Rail voices. I believe that at the rate it is now going, the petition will get more than enough signatures to get the issue on the ballot and with the misinformation already being promoted, it will lose. **Who is paying the "volunteers" to stand outside Post Offices and other public places with petitions?** I believe it is the Petroleum interests, Automobile dealers, Parking lot operators, etc.

Sincerely,

Rev. Samuel M. Smith

October letter follows:

On the 8:00 AM news on KHON TV2, a member of the Kakaako Neighborhood Board correctly and wisely spoke to the issue of the horrendous traffic tie-ups on Kapiolani Boulevard as a result of sewer work and lane closures. I wonder that neither you nor others involved in planning the URGENTLY NEEDED Mass Transit System have glibly overlooked this aspect of building an above ground metro system. Equipment is already in storage that has been tested and very successfully used to build the "Chunnel" between England and France and the BART in California's San Francisco Bay Area. The BART in particular has also already been tested by earthquake, so the evidence is clear that above ground Metro proponents' argument about water, rock and earthquake hazards to the undergrouund system is a smokescreen.

I have previously contacted you on this subject and gave 17 good, valid, common-sense reasons for MASS TRANSIT NOW. If I repeat a few from this new angle please forgive me. (I would welcome a face-to-face debate on the issue before City Council and the media.)

While I URGENTLY support Mass Transit, I equally or with even greater emphasis OPPOSE an above ground system for the following reasons in order of importance:

1. MASSIVE traffic tie-ups during construction that are unavoidable for this type of construction.

2. Delays caused by battles over ***eminent domain*** rights and causes to acquire the necessary rights-of way.

3. Cost of right of way acquisition.

4. The already protested blockage of portions of Oahu scenery by the additional structures.

Benefits of the UNDERGROUND system are:

1. Construction machinery is available capable of boring the tunnels, creating a steel-reinforced concrete tunnel tube with **NO DISRUPTION OF SURFACE TRAFFIC** or buildings above. Spoil dirt is hauled out at the ends and concrete, steel and other materials needed by the machine are hauled in from the ends.

2. AND 3. **No long court battles** over ***Eminent Domain*** rights because virtually all needed right of way already exists beneath present highways, streets and roads. Only terminals or stations might require acquisition of land. Costs for hiring professional tunnel builders and their machinery easily offset by **LACK OF LAND ACQUISITION COST.**

4. No permanent above ground structures obstructing tourist (or our) view of our Native Oahu beauty.

Please do not overlook the URGENT need folks in the entire Leeward area have for MASS TRANSIT NOW!!! But at the same time, please don't overlook the awful gridlock of traffic that buiding an above ground system will unavoidably create. As I have pointed out before, EVERY taxpayer in Leeward Oahu has ALREADY paid FAR more in fuel costs, lost time and vehicle repair and vehicle replacement than the relatively small proposed tax increase that would have already had Mass Transit in place if misguided voters had not rejected the option several years ago.

Finally, our State and Oahu leaders are coming close to agreement that we really DO need MASS TRANSIT NOW. The widening of existing highways and addition of zipper lanes is almost counter productive as more land is gobbled and the fuel consumption and lost time situation is only slightly affected. What about the High Speed Ferry proposal to zoom people from Barbers Point or wherever else in that area that such a landing is decided upon. That is still subject to closing if storm conditions arise, making an even more problematic situation for Leeward residents on such days as people planning to use the ferry suddenly discover at the last minute that they will either have to drive, call a cab or catch a bus. This, I think, is something those pushing for the ferry boat idea seem to forget.

And if a Disneyland style monorail is built, consideration must be given to the disruption of traffic during the construction phase. This, in addition to the fact that it cannot help but at least partially block scenic views. And, since the VAST majority of those most urgently needing MASS TRANSIT NOW are residents needing to get to work on time, they have seen the sights and simply want to leave home as late as possible to arrive at work on time and return home or whatever else they must do with the least lost time commuting from their workplace to home, the UNDERGROUND rail system makes the MOST SENSE. With modern technology, tunnel boring machines such as built the England to France Chunnel and other similar equipment now in storage awaiting a time and place to be used again can easily build earthquake resistant and waterproof systems with only minimal surface support, minimal traffic disruption, no need for additional land, since they can be built beneath existing freeways and other rights-of-way.

For any who question the practicality of and the advantages to the UNDERGROUND mass transit systems for the unique conditions and needs of Oahu and Honolulu, I suggest you secure copies of the titles, Modern Marvels: **Tunnels** [http://store.aetv.com/html/product/index.jhtml?id=12211] or Modern Marvels: **The Chunnel** [http://store.aetv.com/html/product/index.jhtml?id=42739] and Modern Marvels: **The City Beneath Our Feet** [http://store.aetv.com/html/product/index.jhtml?id=42738]. These in order of their significance to Honolulu. Or, I can loan you my copy.

I would welcome a face-to-face debate on the issue before City Council and the media.

Rev. Samuel M. Smith

copy to All News Media,

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010 RT12/08-290874R

Reverend Samuel M. Smith
P.O. Box 1015
Kailua, Hawaii 96734-1015

Dear Reverend Smith:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraph addresses your comments regarding the above-referenced submittal:

As described in Section 2.5.10 of the Final EIS, to support phased opening of the system, the first construction phase must be connected to a maintenance and storage facility, which requires considerable land. The first phase of the Project must be connected to the maintenance and storage facility because, in addition to maintenance of equipment and ongoing operations, the maintenance and storage facility houses the main control center for the entire Project, and the required testing and operation of the system could not be completed without access to it. No location has been identified closer to Downtown, with sufficient available land to construct a maintenance and storage facility. The Project will be constructed in phases to accomplish the following:

- *Match the anticipated schedule for right-of-way acquisition and utility relocations.*

- *Reduce the time that each area will experience traffic and community disturbances.*
- *Allow for multiple construction contracts with smaller contract size to promote more competitive bidding.*
- *Match the rate of construction to what can be maintained with local workforce and resources.*
- *Balance expenditure of funds to minimize borrowing.*

The portion of the corridor Ewa of Pearl Highlands is less developed than the areas Koko Head. As a result, right-of-way can be obtained more quickly and overall Project construction can begin earlier, resulting in lower total construction costs. Construction is planned to continue uninterrupted Koko Head from Pearl Highlands to Aloha Stadium, then Kalihi, and finally to Ala Moana Center.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
Creation Date :	12/7/2008
Creator Affiliation :	
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Alternative Preference :	
Apt./Suite No. :	
City :	Honolulu
State :	HI
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Telephone :	
Telephone Extension :	
Add to Mailing List :	None
Submission Method :	Website
Other Submission Method :	
Submission Date :	12/07/2008
Submission Content/Notes :	Please build the Pearl City to downtown rail first. That segment will actually be used. If the Kapolei to Pearl City segment is built first, and we don't have funds to complete the downtown route, we would be left with a RAIL TO NOWHERE that no one would use. Thank you, Linda Soll

DEPARTMENT OF TRANSPORTATION SERVICES

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

KENNETH TORU HAMAYASU
DEPUTY DIRECTOR

June 11, 2010

RT9/09-331307

Ms. Linda Soll
606 Hunakai Street
Honolulu, Hawaii 96816

Dear Ms. Soll:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall indentify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

As described in Section 2.5.10, Project Phasing, and further in Section 8.6.9, Construction Phasing, in the Final EIS, to support phased opening, the first construction phase must be connected to a maintenance and storage facility, which requires considerable space. No location has been identified closer to Downtown with sufficient available space to construct a maintenance and storage facility. Therefore, construction will begin between East Kapolei and Leeward Community College. The Project will be constructed in phases to accomplish the following:

- *Match the anticipated schedule for right-of-way acquisition and utility relocations.*
- *Reduce the time that each area will experience traffic and community disturbances.*

- *Allow for multiple construction contracts with smaller contract size to promote more competitive bidding.*

- *Match the rate of construction to what can be maintained with local workforce and available financial resources.*

- *Balance expenditure of funds to minimize borrowing.*

The portion of the corridor in the Ewa direction of Pearl Highlands is less developed than the areas in the Koko Head direction. Right-of-way can be obtained more quickly at the west end of the Project; therefore, overall project construction can begin earlier, resulting in lower total construction costs. Construction is planned to continue uninterrupted in the Koko Head direction from Pearl Highlands to Aloha Stadium, Kalihi, and finally to Ala Moana Center.

As portions of the Project are completed, each will be opened incrementally so that system benefits, even if limited during the initial phases, will be realized prior to completion of construction of the entire Project.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
Creation Date :	12/19/2008
Creator Affiliation :	
First Name :	Christian
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Telephone :	808-262-2262
Telephone Extension :	
Add to Mailing List :	Email
Submission Method :	Website
Other Submission Method :	
Submission Date :	12/19/2008
Submission Content/Notes :	I feel that the Honolulu Transit is one of the best transit projects for Oahu. We are only 20 years too late. We need to move forward quickly to make up for all the lost time. We need to meet with other large cities (ex: Portland) to discuss their pros and cons during their development and operations. We need to focus on moving the masses of people that overflow the H1 and H2. That is our purpose. Keeping in mind that any mistakes we make today will cost much more to correct tomorrow. So let's petition input from other cities to make sure we limit any possible mistakes during planning and development. Christian Sorli

DEPARTMENT OF TRANSPORTATION SERVICES

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-332027

Mr. Christian Sorli
P.O. Box 1083
Kailua, Hawaii 96734

Dear Mr. Sorli:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

Your support for the Fixed Guideway Transit Alternative has been noted. While each of the alternatives discussed in the Draft EIS includes trade-offs between benefits and impacts, the Airport Alternative from East Kapolei to Ala Moana has been selected as the Preferred Alternative as described above. As compared to the alternatives discussed in the Draft EIS, the Airport Alternative will carry the most passengers, provide the greatest transit-user benefits, and result in the fewest vehicle hours of delay. It will provide access to employment centers at Pearl Harbor Naval Base and Honolulu International Airport and will serve the Salt Lake neighborhood with connecting bus service. Of the three Build Alternatives addressed in the Draft EIS, the Airport Alternative will have slightly less impacts to the natural and built environment analyzed in the Draft EIS. During the public comment period on the Draft EIS, the public overwhelmingly supported the Airport Alternative. Of the comments that specifically supported one of the alternatives, more than 75 percent were in support of the Airport Alternative. For more

information this selection is discussed in Section 2.4 of the Final EIS. Since publication of the Draft EIS, design has been advanced, further analysis has been completed, and information has been added in response to comments on the Draft EIS and agency coordination. The Final EIS discusses the process that was used to select the Preferred Alternative, how comments were considered in the decision-making process, impacts and mitigation commitments.

Your concern for moving traffic on the H-1 and H-2 Freeways is noted. The purpose of the Project is to provide high-capacity rapid transit service in the highly congested Ewa-Koko Head transportation corridor between Kapolei and UH Manoa. The fixed guideway system will reduce traffic congestion on numerous roadways on Oahu, including the H-1 and H-2 Freeways, as shown in Tables 3-9 and 3-10 in the Final EIS. Experience from a broad range of transit systems worldwide has been used in the development of this Project.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
Creation Date :	11/28/2008
Creator Affiliation :	
First Name :	Marilyn
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Telephone :	808732-7605
Telephone Extension :	
Add to Mailing List :	Both
Submission Method :	Website
Other Submission Method :	
Submission Date :	11/28/2008
Submission Content/Notes :	I support "Rail," but I feel strongly the route should be along Nimitz to the airport, via Pearl Harbor. It's senseless to go through Salt Lake. The airport route would be a convenience residents and tourists alike. We must plan for therail to UH, also.I see little sense with Salt Lake. Even if it's more expensive, please select the airport route.

DEPARTMENT OF TRANSPORTATION SERVICES

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-330919

Ms. Marilyn Stassen-McLaughlin
4300 Waialae Avenue, 203-B
Honolulu, Hawaii 96816

Dear Ms. Stassen-McLaughlin:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall indentify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraph addresses your comments regarding the above-referenced submittal:

Your preference for the Airport Alternative has been noted. While each of the alternatives discussed in the Draft EIS includes trade-offs between benefits and impacts, the Airport Alternative from East Kapolei to Ala Moana has been selected as the Preferred Alternative as described above. As compared to the alternatives discussed in the Draft EIS, the Airport Alternative will carry the most passengers, provide the greatest transit-user benefits, and result in the fewest vehicle hours of delay. It will provide access to employment centers at Pearl Harbor Naval Base and Honolulu International Airport and will serve the Salt Lake neighborhood with connecting bus service. Of the three Build Alternatives addressed in the Draft EIS, the Airport Alternative will have slightly less impacts to the natural and built environment analyzed in the Draft EIS. During the public comment period on the Draft EIS, the public overwhelmingly supported the Airport Alternative. Of the comments that specifically supported one of the alternatives, more than 75 percent were in support of the Airport Alternative. For more

information this selection is discussed in Section 2.4 of the Final EIS. Since publication of the Draft EIS, design has been advanced, further analysis has been completed, and information has been added in response to comments on the Draft EIS and agency coordination. The Final EIS discusses the process that was used to select the Preferred Alternative, how comments were considered in the decision-making process, impacts and mitigation commitments.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
Creation Date :	2/6/2009
Creator Affiliation :	
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Email :	callan@hawaii.rr.com
Telephone :	528-4411
Telephone Extension :	
Add to Mailing List :	Standard
Submission Method :	Website
Other Submission Method :	
Submission Date :	02/06/2009

Submission Content/Notes : Draft EIS comments regarding Honolulu Rail Transit
Submitted Feb. 6, 2009 by Dennis Callan, co-chair, Stop Rail Now
1011 Prospect St., #702, Honolulu, HI 96822
phone 528-4411 email callan@hawaii.rr.com
Please address each paragraph specifically, and explain why you agree or disagree.

At the beginning, let me explain that the following document represents a listing of most of the major objections our organization has raised about Honolulu's proposed rail system. While our statements may not specifically refer to particular sections of the EIS, they are all relevant to the big picture of rail, its supposed advantages, its true problems, and the alternatives, and are thus relevant to EIS considerations.
Our concerns have now taken on even greater urgency considering the nation's economic crisis. How has your financial projection changed as a result of these events which transpired subsequent to your initial planning? How can we pay for rail, upwards of $5 billion of local money, when the state and county are running deficits and the public has lost uncounted billions in home equity and personal savings? Are there not pressing social needs we must fund? Will the state's new highway improvement plan provide a larger, more effective solution than rail? Was the state's new highway improvement plan considered in your studies? If the state's plan were fully implemented how would it affect your numbers about traffic congestion projections? Is it more important to build rail or should state workers be forced to work an additional 10 years before retirement as has just been suggested by the Speaker of the House?
Most grievous of all the many EIS deficiencies listed below is your lack of proper study of the HOT lane alternative. Why was your AA study so superficial and biased?
Because the following issues are so major and heve not been properly addressed in your draft EIS, we ask that a supplement EIS be created that will fully deal with these issues. Merely revising your draft is not sufficient. We need a major new study.
In the days before the Nov. 4 election the city made claims that the draft EIS showed that traffic would be reduced by up to 30% by rail, giving the public the misleading impression there would be a reduction from today's levels. Is this what you meant? If not, how could you be so flagrant in trying to mislead and misdirect the voters days before the election? Where in the draft EIS is there any substantiation for those claims?
SECTION 1:
Why rail transit never improves traffic congestion and why relief must come from highway options, such as HOT lanes
1. Since the advent of the Model-T, followed by the first suburban shopping center in 1923, and then the incredible expansion of suburbs after World War II, we have radically changed our means of getting to work. Not only getting there, but also what we do on the way there - and on the way back. We take our children to school, go for exercise, or go shopping and we no longer shop downtown.
2. Nor do we shop at the small local store, but in supermarkets, and lately, even more distant big box stores like Costco. Our children are in larger, more distant, schools whether public or private, and most of us drive them there.

3. As we move to the suburbs from town, say, Kaimuki to Mililani, we find that bus service is now every hour instead of every few minutes, and so we use it less.
4. We have always valued our time but now, because of increasing incomes, our time is more valuable than it used to be. Accordingly, it plays a bigger role in the decision about how we commute.
5. These are some of the factors that have altered the way we live, and why the percentage of commuters using public transportation has declined every decade since the U.S. Census began measuring it in 1960.
6. It is not that we are in love with our automobiles; it is that we value our time.
7. This is the principal reason that public transportation's share of commuters is declining on Oahu, the mainland, Europe and virtually everywhere else. This share is critical.
8. To hold rush hour traffic congestion on Oahu in 2012 at year 2000 levels we would hava to keep the number of those commuters who are driving to work in 2012 the same as the year 2000. Given the state's forecast of a 10 percent increase in all commuters for 2000-2012, we would have the result shown in the lower table. As you can see, it tells us that, all else being equal; we would have to double the percentage of commuters using public transportation. How likely is that?
9. Before we go on, let's get our terms straight. We must use Metropolitan Statistical Areas (MSA's or metro areas) rather than cities. It is useless to discuss the city of San Francisco without including Oakland and all the other cities that are contiguous to it. And that is why the federal government's data is usually about metro areas, for example, the San Francisco MSA. Similarly, the city of Portland does not run its public transportation but rather Trimet, the three county contiguous area. San Diego's transit is run by SANDAG, the San Diego Association of Governments.
10. Further, we must discuss combined bus and rail transit use because we cannot, in any sensible way, separate them; the use of one without the other is not reliable. For example, Vancouver, Canada, and many other cities offer passes for bus and rail combined and so there is no accurate data about who is using what. In discussing commuting, the most relevant statistics are those of the U.S. Census and the U.S. Department of Transportation and that is what we use here. We also use the nationally recognized Texas Transportation Institute studies on traffic congestion.
11. U.S. metro areas essentially stopped building rail lines around 1920 as rail transit ridership peaked and the first serious and reliable bus service appeared. From that point on until the 1970s, hundreds of U.S. cities removed their streetcar lines and substituted motor buses because it was so much less expensive.
12. Then starting in the 1970s, U.S. transit agencies projected significant increases in public transportation commuting by re-instating rail transit. It did not work out that way.
13. What happened was that of the 15 metropolitan areas with new rail transit, only one managed to increase the percentage of commuters using public transportation during the 1980 to 2000 period. That was San Diego and it only managed an increase from 3.3 percent to 3.4 percent - hardly earth shattering - all others declined.

14. Note that outside of the New York metro area, the percentage of commuters using public transit is very small; nationally those commuting by automobile are twenty times greater than those using transit.
15. This is why, as we see with the earlier Honolulu example, any significant population growth results in new drivers totally overwhelming new transit users. Without major increases in this percentage, new drivers will always overwhelm new transit users.
16. Nationally, 13 million more commuters resulted in 13 million more drivers and a slight decrease in transit commuters.
17. The Texas Transportation Institute recently divided U.S. metro areas into four groups according to population size with the following results:
18. Very Large: 11 metro areas with over 3 million population all with rail lines except Houston - it had the least increase in traffic congestion of the group.
19. Large: 27 metro areas with 1 to 3 million population, half with rail lines. Aside from those areas with little or no commuter growth, the four best performers had no rail lines.
20. Medium: 30 metro areas with 1/2 to 1 million population including Honolulu. Only Salt Lake City had rail and they had the third worst showing of the 30.
21. Small: less than 1/2 million, none with rail lines.
22. This meant that all U.S. metro areas with significant increases in commuters saw a dramatic worsening of traffic congestion - rail transit had made no difference.
23. Everyone agrees that we have a traffic congestion problem and that the worst on Oahu is that found on the freeways and highways along the Leeward Corridor.
24. However, since rail transit has done nothing to relieve traffic congestion in any other U.S. city, it begs the question, what makes anyone think it will do it here?
25. Instead, we believe that the new high-tech High Occupancy Toll lanes (HOT lanes) have shown such promise and such public acceptance that they may be a far preferable alternative.
26. Our proposal is for a two-lane reversible, elevated HOT lane highway between the H1/H2 merge near Waikele and Pier 16 near Hilo Hatties.
27. Buses and vanpools would have priority and travel free, other vehicles would pay a toll that would be collected electronically by way of a pre-paid smart card, as is quite commonplace on the mainland today. As on the San Diego I-15 HOT lanes, the toll price would be dynamically calculated every few minutes to keep the lanes full, but free flowing.
28. One of the more surprising outcomes of implementing HOT lanes is that they are popular with motorists across all income groups. Even those who use them rarely favor them because it is an option they can use in an emergency.
29. A single highway lane with free-flowing non-stop traffic carries up to 2,000 vehicles per hour and with two lanes that means removing 4,000 vehicles from the existing freeway, or 25 percent of the rush hour traffic now using that corridor.
30. Our projection of the HOT lanes traffic of around 4,000 vehicles does not have to be calculated since we know that rush-hour highways are always fully used; we only have to project the toll price that will keep the HOT lanes full but free-flowing. Judging from San Diego's I-15 and

Orange County's SR-91 the average cost will be about $4.50 under normal circumstances and up to $7.75 for special periods such as Friday evenings.

31. A major advantage of HOT lanes is that traffic travels at uncongested freeway speeds of 60mph whereas rail transit can only average 22.5 mph because of stops every half mile. The HOT lane speed enables buses to make two trips in the time it now takes to make one. Further, buses on HOT lanes may travel door-to-door whereas rail nearly always requires transfers. HOT lanes offer both motorists and bus riders a choice of avoiding traffic congestion. The regular freeway is still there and available for free with less congestion than before.

32. The last issue is that of cost. The Mayor and DOT have been using $2.6 billion for a Kapolei to Iwilei first segment. We have added 15 percent per mile for the difficulty of in-town construction and going over H-1 at University Avenue, and that adds $1 billion to the cost. Since the federal funding has a practical limit of $0.5 billion that will leave $3.1 billion for local funding as shown in the table below.

33. The 1/2 percent increase in the G.E. Tax does not come close to funding this system, especially considering annual losses of $59 million and making sufficient allowance for bond interest. Our calculations show that in the out years the revenues from the tax will barely cover the operating losses and bond interest leaving little or nothing for capital repayment. In addition, there has been no consideration for cost overruns.

34. When one considers that this rail transit project would entail a local per capita cost five times greater than any other rail system in the U.S., even after allowing for inflation, that alone should give us pause, even if we are under the mistaken impression that a rail system would have benefits.

35. On the other hand, the 10-mile long elevated HOT lanes would have a total cost of $1 billion, or $100 million a mile. Rail proponents have said that we cannot build it for that price and that it is too wide to use pedestal construction. The earlier rendering shows the Tampa Expressway now under construction which uses pedestal construction and is three lanes wide. Even though it is 30 percent wider than our proposal, it will open this June 2006 at a cost of $52 million a mile. Consultants at the 2002 Governor's Conference on Reversible Tollways had initially calculated the cost at $70 million per mile and later added $30 million for unforeseen problems and other cost overruns.

36. HOT lanes are eligible for the same federal fixed-guideway funding as the rail proposal, which means that with $1 billion total cost and $500 million federal funding, it would only need $500 million in local funding, there being little or no operating costs.

37. Of this $500 million, toll revenues of $20 million annually would pay off $300 million over 25 years using five percent GO bonds. Another $13 million annually would pay off the remaining $200 million balance over 25 years. If we cannot find $13 million annually from city and state budgets without raising taxes someone is not making an effort.

39. Rail has never improved traffic congestion anywhere,

40. We have a traffic problem - not a transit problem,

41. Tax-free HOT lanes give motorists a choice,

42. Tax-free HOT lanes outperform rail transit easily,

43. We can afford HOT lanes and we cannot afford rail.

Why did you not give proper consideration to the following? Please address each statement specifically, and explain why you agree or disagree.
Section 2
Alternative Solutions:
1. Staggering work and school hours
2. Implement 4/5 day work schedules (one week 4 days, next week 5 days, days off alternate)
3. Implement 4x10 work shifts (four 10 hr shifts 4 days)
4. Change UH class hours to not commence during peak rush hours; possibly only lecture
5. courses before 10:00am which are broadcast over the internet so students can stay at home until after 9:00am
6. Reversible elevated lanes on Nimitz viaduct. The State Transportation Department has already made plans this project, which would be very effective, improving existing traffic needs.
7. Decrease response time to roadway accidents/debris removal/investigations
8. Incentives to businesses for home-based employment (which will become more ubiquitous with technology)
9. Pay at the pump insurance
10. Require developers on the west side to build commercial and industrial space equal to every residential space built
11. Develop a FUNCTIONING traffic management system that can synchronize and control traffic lights to address problem areas. Install more "smart" traffic lights that can read traffic flow/speed.
12. Remove all unregistered cars, cars without insurance or safety stickers from the roads
13. Employees that don't drive cars to work should be credited for not requiring parking
14. stalls (most employers offer parking stalls for employees but DON'T pay them $200+
15. month or more, which is the cost of parking in town, if they don't need them)
16. Create a better urban plan with higher density housing in the urban core and discourage continued suburban sprawl in suburbs. Change Land Use Ordinance to allow grandfathering of existing higher-density homes, to curb urban sprawl.
17. More dedicated HOV lanes.
18. Install traffic lights at freeway entrances
19. Expanded contraflow lanes (e.g. Dillingham)
20. Fix potholes which cause accidents, tire blowouts, and slow cars down
21. Advanced tow truck deployment system for accidents and stalls
22. Install mora bicycle lanes.
23. Free public parking for microcompact cars (e.g. Smart car, et al)
24. Tax credits for developers of commercial and industrial space in West Oahu
25. Expanded carpooling program utilizing hybrid and electric van
26. Build a REAL ferry system (NOT THE BOAT)
27. Provide incentives to encourage use of electric riding vehicles, such as electric mopeds and electric-powered bicycles (e.g. "cages" or lockers for parking)

28. More grade-separated underpasses at critical intersections.
29. More distance learning courses for colleges and high schools
30. Raise parking rates for government workers to market rates

Section 3 BRT Success
Why would these success stories not apply to Honolulu? Please address each paragraph specifically.
1. While early adopters of bus rapid transit, such as Curitiba (whose system opened in 1974), Pittsburgh (1977), and Ottawa (1983), have shown that BRT is an effective transit mode, it is only over the last decade and a half that interest in BRT has skyrocketed to its current level as its ability to serve lower-density neighborhoods and its cost advantages over other modes have become better known. Today, BRT systems operate in 19 countries on five continents, with many more systems being constructed or planned. Interest in the mode has also come from the federal level. Since 1999, when the Federal Transit Administration launched a BRT demonstration program, BRT systems have been implemented in Boston; Eugene-Springfield, Ore.; Santa Clara County, Calif.; and are currently being implemented in Cleveland; Hartford, Conn.;Houston; New York City; Westchester County; and other places.
Las Vegas
2. In 2004, the Regional Transportation Commission of South Nevada introduced MAX (Metropolitan Area Express), a BRT line acting as a supplement to the heavily-used Route 113 bus line in Las Vegas. This service incorporated architecturally pleasing stations, highcapacity European buses with multiple doors, off-vehicle fare payment, dedicated bus lanes on most of the route, signal priority, and level boarding at bus stations. After six months, ridership on the corridor had increased by 25 percent (from 7,800 to 9,800 passengers per day), and 25 percent of MAX riders said they were new to transit.37 MAX cut travel time on the 7.5-mile corridor in half (to 25 minutes) and gained a reputation for reliability and convenience (as measured by passenger surveys).
Los Angeles
3. Los Angeles is often considered the city of the automobile, but it hes also engineered two successful experiments in bus rapid transit. In 2000, the city unveiled "Metro Rapid" bus service on two demonstration corridors. Metro Rapid lines incorporated simple routes, frequent service, signal priority, level boarding, and an aggressive branding and marketing campaign; this "BRT-lite" (not incorporating dedicated lanes, high-capacity buses, off-vehicle payment, or multiple-door boarding) service improved travel time on both corridors by more than 20%, increased ridership by about 40% (daily ridership on the two corridors was 77,000 before Metro Rapid service began, and 107,400 after), and was perceived by riders as "a quantum leap in service performance and quality."38 About a third of the increase in ridership was from new transit users. Los Angeles has since created additional Rapid corridors and will have a total of 28 Rapid lines by 2008.
4. In 2005, Los Angeles opened the Orange Line, a full-fledged BRT service which featured a dedicated busway, off-vehicle payment, and the Metro Liner, a 60-foot bus that the LA Metropolitan Transit Authority bills as "the most advanced transit vehicle ever introduced in North America... the biggest leap in style and appearance our industry has

seen in 30 years." During preliminary studies, Los Angeles' MTA projected 22,000 daily boardings on the 14-mile corridor by 2020. The Orange Line averaged 21,828 daily weekday boardings in May 2006, nearly meeting this prediction 14 years ahead of schedule.

TOD

5. In addition to providing commuters with an effective alternative to driving, a cross-corridor transit system like bus rapid transit could afford municipalities the opportunity to pursue transit-oriented development (TOD). TOD is a land-use strategy whereby residential, office, and retail development is concentrated around transit stations. The term also refers to the developments themselves. TODs are typically mixed-use, walkable developments with higherthan average density. Compact development oriented around transit stations has been proven to increase transit ridership and increase real estate values around the station.41 A comprehensive assessment of TOD as practiced in the United States identified many other benefits.42 Transit-oriented developments tend to command higher rents than comparable developments not close to transit, yet are also natural locations for affordable housing as residents of TODs do not need to own as many automobiles or use them as often as non-TOD residents. TOD is therefore a strategy that can both revitalize struggling neighborhoods and attract development. Because transit-oriented developments are denser and create less car use than non-TODs, a landuse strategy focusing on TODs preserves open space and reduces the cost of infrastructure such as roads and sewage lines. Reduced car use means reduced traffic congestion and air pollution. Proponents of TOD do not claim that these benefits magically appear through the creation of a transit stop; rather, they accrue from the synergy between transit access, mixed-use development, and density. Maximizing these benefits requires careful design; there is no "one-size-fits-all" TOD blueprint. Project for Public Spaces is one internationally known nonprofit which focuses on what it calls "placemaking," for example. In addition, some private developers specialize in building TODs.

6. In poor market conditions, development is less likely to occur. But when market demand exists, land-use regulations and developer incentives can focus growth around transit stations. For example, New Jersey's Transit Village Initiative provides funding and technical assistance to 19 designated "transit village" municipalities which engage in TOD around NJ Transit rail and bus stations (see left). Boston's TOD-supportive policies include a cap on downtown parking, a requirement that plans for large developments include transportation mitigation, and increased police presence around transit stations considered unsafe.44 In many municipalities, zoning regulations must be tweaked to allow for mixed-use developments.

7. It has been argued that developers shy away from bus transitoriented development because of buses' lack of permanence-unlike a rail line, a bus route can be easily changed, hurting busi nesses built to take advantage of proximity to transit. This criticism is not particularly relevant to high-end, capital-intensive bus rapid transit systems. BRT may be cheaper to implement than rail, but it still represents a sizeable investment, particularly when dedicated busways are involved. A review of the academic and government literature on bus rapid transit and transit-oriented development concluded that "the argument that fixed rail

infrastructure has more magnitude and permanence compared to busways is weak."
8. In Ottawa, transit-oriented development centered around BRT has been wildly successful. Strong land-use controls have concentrated commercial development around Ottawa's Transitway.46 Between 1988 and 1991 alone a billion Canadian dollars of development was built or in the process of being built along the Transitway. Stations anchor office parks, shopping malls, and mixed-use developments; one station is even directly connected to a hospital. More evidence for bus transit-oriented development comes from Pittsburgh's busway system. A 1996 analysis of Pittsburgh's 9.1-mile East Busway found that between 1983 (when the busway opened) and 1996, 59 new developments (including retail, office, residential, and medical complexes) valued at $302 million had been built within a 6-minute walk of busway stations.47 This was despite terrain constraints which limited development opportunities, despite declining population in the communities adjacent to the busway, and despite the absence of Ottawa-style land-use planning.
9. The Port Authority of Allegheny County estimates that another $203 million in development occurred between 1996 and 2004.48 These are not the only successes. Areas as far-flung and different as Seoul, Korea; Curitiba, Brazil; and Boulder, Colorado have had success with bus-centered TOD.50 It can happen here as well. At a recent land use charette, the Regional Plan Association identified several spots in the Rockland half of the Tappan Zee corridor that could support transit-oriented development, including Nanuet, Airmont and Montebello, and Suffern. The Westchester Department of Planning has identified Tarrytown, White Plains, and Port Chester as areas primed for downtown density increases. 51 The success of transit-oriented developments depends on multiple factors, including political leadership, government incentives, landuse regulations, the strength of the real estate market, and the level of traffic congestion in the area (which affects demand for transit-oriented living).
10. But it cannot be overemphasized that one of the most critical factors is the effectiveness of the transit system. Only when a transit system effectively connects places does access to transit-the heart of the TOD concept-become a valued commodity. And so the question of which transit mode can best support TOD is inextricably linked to the question of which transit mode is best suited to the development and commuting patterns of a given area.
Section 4 HOT Lanes
Why would these success stories not apply to Honolulu? Please address each paragraph specifically.
1. Mark Muriello discussed the Exclusive Bus Lane (XBL) in New York City. He described the tunnels and bridges operated by the Port Authority of New York and New Jersey, the operation of the Lincoln Tunnel, and the XBL. He also highlighted recent studies examining options for enhancing operation of the tunnel and increasing capacity.
2. The Port Authority of New York and New Jersey operates a number of bridges, tunnels, and terminals in the New York City area. These facilities include the George Washington Bridge, the Bayonne Bridge, the Goethals Bridge, the Holland Tunnel, and the Lincoln Tunnel.
3. The Lincoln tunnel serves the midtown corridor into and out of Manhattan. The tunnel includes three tubes, each with two traffic lanes.

In the morning, two tubes, or four traffic lanes operate in-bound toward Manhattan. In the midday, the middla tube operates with one lane in each direction of travel, providing a total of thrae lanes inbound and three lanes outbound. In the afternoon, two tubes or four traffic lanes, operate outbound from Manhattan.

4. The XBL provides priority for buses approaching the Lincoln Tunnel in the morning, inbound direction. The XBL is a contraflow lane for buses only on I-495. The XBL uses the inside lane of the westbound freeway for buses. The configuration provides for three general-purpose lanes and the XBL lane in the eastbound direction and two general-purpose lanes in the westbound direction.

5. The XBL is the busiest bus lane in the U.S. Some 1,700 buses use the lanes on a daily basis. These buses serve 62,000 weekday commuters. The XBL serves more commuters to Midtown than PATH, Ferries, or Penn Station commuter rail. The XBL saves commuters 15-20 minutes each day compared to traveling in personal vehicles.

6. The Lincoln Tunnel and the XBL are significant parts of the mass transit system in the New York City area. Buses carry nearly 80 percent of all trips through the Lincoln Tunnel during the 6:00 a.m.-to-10:00 a.m. time period. The XBL alone carries over 50 percent of these commuters. Approximately 55 percent of all bus commuters to the Manhattan CBD arrive via the Lincoln Tunnel.

7. The number of buses using the XBL has increased significantly over the past 25 years. A number of operational improvements have been made to deal with these increases and to enhance bus operations. A new acceleration lane was added to help maintain travel speeds and traffic flow at merge points. The acceleration lane helped increase throughput of the XBL.

8. Capacity shortfalls have also been addressed with operational changes to enhance efficiency. Examples of these operation changes include prohibiting charter buses prior to 9:00 a.m. and prohibiting empty buses at all times. Other examples include the requirement that all XBL buses have E-Z Pass electronic toll payment tags and opening the XBL 15 minutes earlier.

9. Planning is also underway examining the long-term transportation needs in the corridor. A range of options for the corridor are being assessed in partnership with an array of partners. These partners include federal, state, regional, and local agencies. Planning activities include a simulation of the Lincoln Tunnel corridor, and XBL expansion feasibility study, and a West Midtown bus parking and staging study. Other efforts include the Lincoln Tunnel HOT/express bus lane options study and the Lincoln Tunnel HOT/commercial vehicle priority lane options study.

10. The Federal Transit Administration (FTA) is sponsoring a study to evaluate the feasibility of creating a second priority bus lane. The objective of the study is to increase the passenger throughput of the corridor and to enhance the reliability of the XBL. A full array of options are being explored. These options include operational alternatives to improve traffic flow and safety, physical alternatives for lane separation and ramp connections, and capital options to expand capacity. Capital options include the potential of widening the roadway, removing the center piers in the tunnel, and an elevated roadway scheme. Very limited right-of-way and the geometry of the existing facility provides

significant challenges for many of the options.
11. The FHWA's Value Pricing Pilot Program is sponsoring a study of pricing options to manage demand on the XBL with HOT lanes. A second XBL lane would be underutilized initially, so the study is examining the potential to fill some of the available capacity with non-bus HOVs or with non-HOV vehicles. The study is exploring pricing options that balance traffic demand with non-HOVs. Stated preference surveys of motorist are being conducted to help determine the tradeoffs between price and LOS variables, including travel time savings and trip-time reliability.
12. The Lincoln Tunnel HOT lane study will help quantify and address concerns with potential lane conversion. The study will examine the LOS and delay in the remaining two regular travel lanes. It will also assess traffic queuing in the remaining regular travel lanes and the residual impacts on the local street network. The study will consider the need to balance demand for a new managed lane to ensure bus priority treatment and effective capacity utilization.
13. The HOT commercial vehicle priority options study will explore the potential for commercial vehicles to receive priority treatment in a new special-use lane during the shoulders of the morning peak-period. The objective of this study is to find ways to take advantage of the presence of a separated lane to create travel time advantages and reliability improvements for small package and local delivery trucks.
The Evolution of Houston's Express Bus System
14. Jeff Arndt discussed the evolution of the express bus services in Houston associated with the development of the HOV lanes. He described the initial bus services operated with the I-45 contraflow HOV lane demonstration project, the implementation of more extensive services as the HOV lane system developed, and the integrated bus system in operation today.
15. The I-45 North contraflow lane demonstration project was implemented in 1979. The bus service initiated with the contraflow lane focused on downtown Houston. Bus service was constrained by very limited access. There was no direct access to and from park-and-ride lots, which limited service flexibility. The concept of premium service, which included over-the-road coaches and other enhancements, was initiated with the contraflow lane. This initial authorized vehicle lane (AVL) concept with a focus on downtown Houston evolved into an HOV systems approach.
16. Bus services were expanded as other HOV lanes were implemented. The design of the HOV lanes included direct connector ramps from major park-and-ride lots and transit centers. Service was expanded to non-downtown destinations, such as Uptown and Greenway Plaza. Direct service to these areas was provided from some park-and-ride lots, while connecting service from downtown or other transit centers was used in other cases.
17. The continued development of the HOV lane system provided more flexibility in service. Direct non-CBD services continued to be expanded. Commuter route connections at transit centers were also implemented. In addition, a few two-way ramps were developed. Limited off-peak service was provided on some routes.
18. The Houston experience highlights some lessons to be shared with other areas. First, the 2+ occupancy level caused some of the HOV

lanes to become congested, degrading the travel time savings and trip-time reliability for buses and bus riders. Second, the system changed from trained and tested users to any traveler meeting the occupancy requirement. Over time there has been some erosion of transit incentives and vanpooling has diminished. Recently, there has been a focus on new users. The QuickRide program, which allows two-person carpools to use the I-10 West and the US 290 HOV lanes during the 3+ period for a fee, has been in operation for approximately five years.

19. The current transit system in Houston represents a maturing service network. Transit centers provide connections for shuttle services, neighborhood circulation services, and commuter routes using the HOV lanes. There is also a connection to MetroRail, the new LRT line.

20. Currently, some 104 miles of HOV lanes are in operation in six freeway corridors in Houston. The system also includes 25 park-and-ride lots and 17 transit centers. In December 2004, some 37,400 daily vehicle trips were made on the HOV lanes accounting for approximately 116,000 person trips. A total of 32,415 parking spaces were available at the park-and-ride lots, with approximately 17,126 parked vehicles on a daily basis.

Bus Rapid Transit Studies in the State of Maryland

21. Robert Boot discussed BRT studies and projects in Maryland. He described the main characteristics of BRT, summarized current BRT studies and projects in Maryland, and identified potential issues with implementing BRT.

22. There are a number of factors influencing the consideration of BRT in communities throughout the world. BRT has lower upfront costs than other fixed guideway modes and can be implemented relatively quickly. BRT provides the opportunity to take advantage of underutilized rights-of-way. BRT provides operating flexibility and a way to increase transit ridership in select corridors. Local busways can also use portions of the dedicated BRT transitway.

23. BRT is being considered in Maryland to help respond to increases in travel demand, limited resources, and transportation needs. The new governor and his administration examined future transportation needs and options. The study, Bus Rapid Transit: Flexibility by Design, Offering Mobility Options for Maryland, completed by the Maryland Department of Transportation (MDOT) notes that BRT combines the service and quality of rail with the flexibility of buses.

24. The 2004 Maryland Transportation Plan focuses on the goals of efficiency, mobility, safety and security, productivity and quality. The plan includes numerous strategies for addressing mobility needs. Consideration is given to BRT as a viable alternative to provide realistic solutions to customer needs in corridors throughout the state. It includes active consideration of BRT on managed highway lanes to lower vehicle-related emissions and to improve regional air quality while providing viable new transportation alternatives to Maryland's commuters.

25. BRT projects in Maryland include the Red Line in Baltimore, the Green Line in Baltimore, the I-270/US 15 Corridor, and the Bi-County Transitway. Planning for the Red Line in Baltimore started in 2000. The project originated from the first comprehensive planning effort in nearly 40 years. In March 2003, the Baltimore Region Transit Plan was completed and adopted. The plan serves as a guide for the expansion of the Baltimore transit system.

26. A number of issues had to be addressed with the Red Line project. There was community sensitivity related to possible impacts on property values and environmental concerns. Available right-of-way was limited in many parts of the corridor. There were also concerns about operating BRT in downtown Baltimore without taking an existing traffic lane.
27. The Green Line in Baltimore also originated from the 2003 Baltimore Region Transit Plan. Potential issues with the Green Line included the preservation of green space along the roadway, as an existing grass median is the proposed location for the BRT. Determining potential station locations and existing density and ridership are other potential issues.
28. The Corridor Cities Transitway (CCT) is proposed in the I-270/US 15 corridor. The corridor stretches from the Shady Grove Metro Station in the south to Briggs Ford Road in the north. The corridor includes both Montgomery and Frederick Counties. The CCT alignment was identified in county master plans in the 1970s. In 1994, a Major Investment Study (MIS) was initiated. Public meetings and workshops were held in 1995 through 1997 as part of this process. The MIS recommended alternatives for a detailed planning study. Informational public workshops were held in 2001 and focus group meetings were conducted in 2001 and 2002. The Draft Environmental Impact Statement (DEIS) was completed in 2002 and location/design public hearings were held. Public information meetings on express toll lanes (ETLs) were held in 2004 and minimization options refinements were completed.
29. The Bi-County Transitway project was first identified in the Montgomery County Feasibility Studies in the 1980s related to the County's purchase of the Georgetown Branch railroad right-of-way. A transitway/trail was included in the County Master Plans. In 1996 the MTA completed the Georgetown Branch Transitway/Trail MIS/DEIS and the 2002 Capital Beltway/Purple Line Study was conducted. Possible issues with the Bi-County Transitway include potential community and environmental impacts. The jurisdiction in the area has different preferences. Connections with existing Metrorail service may also be a concern.
30. There are some general issues that may need to be addressed with all the BRT projects. The first issue is the public perception of buses, which still seems to be lower than other transit modes. A second potential issue is balancing a quality system with possible impacts, including community impacts related to limited right-of-way. Third, there may be a perception that BRT is not conducive to transit oriented development. There may also be short-term and long-term implementation concerns.

Virtual Exclusive Busways (VEBs)

31. Robert Poole described the virtual exclusive busway concept. He reviewed the early development of HOV lanes, which included a major focus on buses. He discussed how managed lanes and pricing can provide a virtual exclusive busway. He recognized the assistance of Ted Balaker of the Reason Foundation with the study and the presentation.
32. Value pricing makes it feasible to realize the promise of exclusive busways by providing high-speed, high-frequency bus service that is sustainable on a long-term basis. In the real world of limited funding, however, there is a need to re-think how special-purpose lanes are used.

33. Some HOV lanes began as busways. FHWA/UMTA policy in the 1970s supported busways. There are only a few exclusive busways today, however. These facilities include the Lincoln Tunnel XBL, the Pittsburgh busways, the Miami busway, the Seattle bus tunnel, and surface-street busways in Las Vegas and Orlando.
34. Concerns about low use with bus-only lanes led to allowing HOVs. The Shirley Highway busway demonstration project started as buses, vanpools, and 4+ HOVs in 1973. The occupancy requirement was lowered to 3+ in 1989. The Los Angeles El Monte Busway on the San Bernardino Freeway in Los Angeles was opened to 3+ carpools in 1976. The I-10 West HOV lane in Houston began with a carpool definition of 4+. This requirement was lowered to 3+ and then to 2+. Nationwide, the percentage of commuters who carpool has declined since 1980. The lane miles of HOV facilities have increased during this same time period.
35. A significant percentage of carpools are formed with family members. This trend was identified in Commuting in America II. Recent surveys in San Francisco, southern California, southeast Wisconsin, and Minneapolis-St. Paul, indicate that family-based carpools account for between 33 percent and 67 percent of total carpools.
36. It appears that vanpooling has been hurt by carpool preference. The time-savings realized by HOVs is reduced when the lanes are filled with 2+ carpools. Also a larger time savings is needed to offset the time cost of assembling a vanpool. Vanpooling is a highly cost-effective mode. The cost recovery ratio of vanpools sponsored by public transportation agencies throughout the country range from a low of 30 percent to a high of 117 percent. The overall average of nine vanpool programs was 80 percent. Vanpools are also energy-efficient. Vanpools have the lowest British Thermal Unit (BTU) per passenger mile of transit modes and personal automobiles.
37. BRT in HOV lanes is not sustainable. At the 2+ vehicle-occupancy level HOV lanes become congested and travel time savings and trip time reliability to transit is lost. There may not be enough demand at a 3+ vehicle-occupancy level and an HOV lane may suffer from the empty-lane syndrome. There is no way to fine tune occupancy as you cannot have a 2.7 vehicle-occupancy requirement.
38. Value pricing offers precise control. The I-15 HOT lane uses quasi-real-time variable pricing. The 91 Express Lanes use a fine-tuned rate schedule, with periodic adjustments. The Express Lanes carry 49 percent of peak traffic with 33 percent of the lane capacity. Both facilities offer reliable high speeds during rush hours.
39. The virtual exclusive busway (VEB) concept would use value-priced lanes or networks. Pre-defined capacity would be reserved for buses and super-HOVs. The remaining capacity would be sold through value pricing.
40. An example of VEB capacity highlights how the concept would work. First, the capacity of a lane is approximately 1,700 vehicles per lane per hour. Second, space would be allocated for 60 buses per hour, which is the equivalent of 120 personal vehicles an hour. The remaining available capacity in the lane is 1,580 vehicles an hour. A percentage of this capacity would be allocated to vanpools and super-HOVs. The remaining capacity would be allocated to paying customers.
41. The managed lanes project on I-10 West in Houston provides a VEB prototype. The project represents a partnership among Houston

METRO, TxDOT, and HCTRA. The four new managed lanes in the center of the expanded freeway will use value pricing. HCTRA is helping the fund the lanes and will operate them. METRO is guaranteed 65 buses and hour and 25 percent of capacity for buses and HOVs. A LOS C will be maintained using pricing and occupancy controls.
42. The I-10 West managed lanes highlight the benefits to transit of this approach. Although METRO will not receive any toll revenues, it will be able to operate 65 buses an hour, which is above current service levels. FTA approval was granted based on maintaining a LOS C. A 3+ occupancy requirement will be used for carpools to travel for free. All of these elements are covered in a MOU. A VEB can facilitate region-wide express bus/BRT service. A regional network would require construction of new lanes and flyovers. These major capital costs would be paid out of toll revenues.
43. A VEB network provides a cost-effective approach. The cost of a 500-lane-mile VEB network has been estimated at $2 billion-to-$3 billion in the Reason Foundation studies. In comparison, FTA data indicates the cost of a 250 route-mile light rail system is $31 billion and the cost of a 250 route-mile heavy rail system is $38 billion. In addition, the VEB guideway would not depend on FTA funding.
44. Managed lanes are being considered in a number of metropolitan areas through the country. Some changes in policies are needed for VEB networks. First, there must be clear FTA policy approving HOV to HOT conversions. Second, managed lanes need to be defined as "guideways" in Section 5302 of Title 49. Third, VEB or VEB networks need to be considered an alternative in new starts evaluations. Finally, VEBs should be made eligible for New Starts funding for buses, stations, and park-and-ride facilities.
45. Exclusive busways are key to competitive express bus/BRT. Exclusive busways are too costly and are wasteful of capacity. VEB is feasible with value pricing and with agency cooperation. VEB can provide a win-win situation for transit agencies, motorists, and state departments of transportation.
Section 5 Why buses are better
Please address each paragraph specifically, and explain why you agree or disagree.
1. There's a missing factor in the formula pushing a 5-billion dollar rail system into our suburbs, and this traffic solution is doomed to fail without it. The simple truth is that a rail transit system requires a dense residential pattern to make it work, which we do not have on Oahu. This crucial relationship between transportation and land use has not yet been properly addressed.
2. The often-cited description of Honolulu conjured up by rail proponents as a dense, linear city ideal for rail is a myth. Our biggest transit problem is that Oahu's settlement pattern of single-family homes in suburban subdivisions is too dispersed for rail to be effective. If we build the rail line and don't change the way we build new housing this system will be a colossal disaster. How many people right now live within walking distance of any likely stations? Not nearly enough to support rail rapid transit.
3. When you look around the world at successful rail transit systems you see they are in cities with medium and high density housing where people can walk to the station and then walk to their work place at the

other end. A global trend in city planning is creation of the urban village, both in the city center and in the fringes with construction of new towns. Such increased housing density could enhance quality of life by developing a village atmosphere and supporting our need for close-knit communities where people interact, unlike today's isolated neighborhoods. Shops, restaurants, entertainment, jobs, schools, mass transit, and other enjoyable urban amenities would be easily accessed in a more dense community if it is properly planned.

4. There is a causal relationship between our problems of unaffordable housing and congested traffic, because we have spent years building the wrong kind of homes in the wrong places, covering our landscape with big, expensive houses, generating suburban sprawl that has produced tremendous traffic problems. These unattended problems will only grow worse if we are distracted with an ineffective, fixed rail pipedream. Jumping into a rail commitment at this point is just not going to work.

5. Consider how someone living in a single-family suburban home would have to get to work on rail: walk to a bus stop, wait for the bus, ride to the rail, walk to the platform, wait, board, ride, walk from the rail to another bus stop, wait, board, ride, walk to work; then do the same thing in reverse going home. Who is going to put up with this? Most who are supporting rail probably would not ride it -- but hope in vain that others will, to make more room on the roads for the rest of us.

6. There are better transportation alternatives which could provide faster relief and perhaps eventually evolve into a rail system. One obvious strategy is to vastly expand our bus system. We need more buses, exclusive lanes, frequent service, additional routes, express lines, better connections and lower fares. Our present bus system is often claimed to be one of the nation's best, which is another myth that stands in the way of true solutions. It can be drastically improved.

7. Extensive road construction will be needed, including some elevated busways, bus stations,

8. underpasses at busy intersections, more use of contraflow and other management improvements. In the future, if bus utilization grows heavy enough, this system of elevated structures and exclusive bus lanes could be converted to rail, which would ultimately have more capacity; but it would be a mistake to attempt a transition directly to rail at this point when we are not yet ready.

9. Why not just build the rail now along with the higher density housing to go with it? That would be nice if we could trust the brilliance of our politicians and private land developers to do the right thing, but with their sorry record of land use planning we must not be gullible. This new kind of housing approach needs to be demonstrated with real results and in tha meantime it can be supported with an expanded bus system which can evolve into rail transit.

10. Unfortunately, our misguided state legislature passed a flawed bill last session that prohibits expenditures of new transit revenues on road improvements. How can the city now tell us with a straight face that all transportation alternatives are currently being given fair consideration? This state legislation could be changed, but given past performance, the outlook is bleak.

11. Our former mayor was probably on the right track with his BRT plans using modern buses driving on exclusive lanes and circulating in existing

streets. A well-planned bus service could pick you up near home, bring you to a bus station where one transfer would put you on a bus that is going close to the final destination, riding on exclusive lanes that will be free from traffic. Commuters could also drive to transit stations at regional shopping malls, park for the day and catch an express bus direct to their destination. The whole island can benefit from this approach rather than one narrow leeward corridor. Another promising technology is creation of high-occupancy toll lanes, but the city studies are also ignoring this option.

12. At the same time we can be preparing ourselves for a future rail system by building new housing in well-planned, medium and high-density apartments -- which can be affordable and very beautiful when done right. Clustered villages can be created with a mix of townhouses and highrise apartments that could support neighborhood shopping, entertainment and other urban amenities. These clusters could be developed in the urban core as well as carefully-selected regions of the island. It can happen, but it will require a serious community dialogue and basic transformation in the way we build housing, requiring a prohibition on most new single-family houses and active government involvement in consolidating small private parcels for larger planned communities through aggressive use of eminent domain.

13. Let's not be railroaded into paying for a premature, expensive rail system that will take forever to build at great inconvenience and won't work. At this time and for the foreseeable future rail is a luxury that we are not ready for and cannot afford. Imagine ten years of disruptive construction for a massive elevated train that hardly anyone in our lifetimes is going to use, leaving the rest of us stuck in gridlock and our children permanently unable to find affordable housing. We can do better.

Section 6 Rail Will Fail: HOT Lanes are Better.

Please address each paragraph specifically, and explain why you agree or disagree.

1. ENVIRONMENT: An elevated train running through the heart of our city would be an environmental blight on Honolulu. Elevated tracks would be ugly, running through downtown and eventually Waikiki, defacing our beautiful city and damaging our tourist industry. The elevated guide-way will destroy views for tourists and residents, along the way. Managed Lanes would also be eleveted through part of the Leeward corridor to avoid the bottlenecks, but would come down to ground level in Iwilei before reaching downtown, and would not cross the heart of town as an elevated monster.

2. The city's own projection is for traffic to be far worse, with rail, than it is today, so since rail will not solve the problem, why should we pay for it, and what should we do instead? Yes, rail transit would have a dedicated right-of-way above the congested traffic, but so would the express bus system on a fixed guideway, or "HOT Lanes," (High-occupancy and toll lanes) which can operate far more efficiently at lower cost than rail, with a mix of express buses, carpools and toll-paying cars, providing faster service from many origins directly to many destinations. Reversible HOT Lanes would be far superior to rail for Oahu for all the following reasons.

3. EXPRESS: Buses can utilize a guideway better than rail because buses can pick people up in our dispersed communities and drive

directly onto the guideway, quickly reaching the destination non-stop and without transfer. Buses do not need stations on the guideway, for they would use regional bus stations that people could easily get to. Train stations will not have such versatile access and will not be close to our dispersed, existing residences.

4. SPEED: Trains stops at every station along the line, like riding an elevator up a 30-story building and stopping at every floor. The city's official speed estimate for Honolulu rail service is an average of 23 mph, which is far less than the 60 mph an express bus can expect on an exclusive elevated lane. Because of higher speed and fewer transfers, bus will attract more riders than rail and more effectively reduce traffic congestion. With this higher bus ridership, the cost per rider of bus would be lower than rail, which will undoubtedly fail to attract any large number of users.

5. TRANSFERS: Rail riders would have to transfer many times on the daily round-trip, as in this likely journey: a) travel from home to a bus stop, wait for the bus, b) ride the bus, c) walk from the bus to rail, wait for the train, d) ride the rail, e) walk from rail to bus, wait for the bus, f) ride the bus, g) walk to reach destination. Then returning, everything is in reverse: h) walk to bus stop, wait for bus, I) ride bus to rail, j) walk from bus to train, wait for train, k) ride train, l) walk from rail to bus, then wait for the bus, m) ride bus, n) travel from bus stop to home. (14 travel segments, including 4 transfers) Studies have shown that people hate to transfer.

6. CONGESTION: Rail service will do nothing to reduce traffic congestion: the city study shows that current over-capacity on H-1 peak hours is 6%, and by 2030 over capacity will be at 31% with the rail in place. Buses and vanpools on free-flowing HOT lanes could reduce traffic by 20-25 percent. The city's own studies show rail would only remove 2% of trips from the roads.

7. UTILIZATION: Extra space on the fixed guideway can be used by other vehicles, particularly vanpools and car-pools. If there is available space, some additional vehicles can pay tolls (collected electronically, without cars having to stop) and the tolls can pay for much or all of the transit system. The amount of traffic would be regulated to allow maximum capacity without congestion, enabling full utilization of the guideway space unlike rail, whose expensive tracks would be empty most of the time. We will get the most bang for our buck.

8. CAPACITY: Surprisingly, an exclusive bus lane can easily carry more passengers than a rail line. Five-hundred buses an hour, carrying 25,000 seated passengers, enter the New York City main bus station daily on one dedicated bus lane. The maximum capacity estimated for Honolulu's proposed rail is 10,000 people per hour. A good bus lane has a maximum capacity of 1,000 buses an hour, carrying 50,000 seated passengers! High-capacity busways on dedicated lanes operate in Newark, Los Angeles, San Diego, Washington, D.C., Curitiba, Bogota, Brisbane, Ottawa, Port-of-Spain and elsewhere, as this technology gains increasing traction.

9. UNIONS: Unionized rail workers can hold the city hostage as shown by recent metro strikes in Paris, London and New York. Bus unions don't have as much leverage because people can ride private buses, use carpools, pay tolls and still drive the HOT lanes. Rail service is provided by a monopoly, while a busway could carry buses of different

companies providing competitive service. Rail construction is by non-bid single-source contract, vulnerable to political manipulation, unlike road-building which is open to many bidders.
10. BREAKDOWNS: Busways can be built more quickly than rail and can readily be repaired in an emergency. Rail structures cannot rapidly be replaced or repaired if damaged. Buses and other vehicles can drive around a disabled bus. All trains come to a halt if there is a disabled train on the track. Busways-HOT can accommodate emergency vehicles and provide an evacuation/alternate route in the event of another September 5th "Black Tuesday" freeway closure.
11. COST: The price of constructing the rail system is astronomical, probably reaching $6 billion by the time all the cost over-runs are paid for, compared with less than $1 billion for elevated HOT Lanes, despite the city's absurd claim of nearly $3 billion for "managed lanes." A similar system in Tampa was built for $300 million. Rail would end up costing each family of four about $24,000, even though only a few percent of the population would ever use it. We estimate construction cost per rider at $120,000 with daily operational subsidy of $15. The Federal Government Accountability Office has compared operating costs, and the majority of cities have lower operating costs for their Bus Rapid Transit systems than for their light rail systems. HOT Lanes also save money by making better of our existing streets as feeder lanes for high-capacity buses, plus we benefit from free labor and equipment supplied by drivers of HOV vehicles and toll-paying autos. Buses can be more easily replaced as technology improves. There are hybrid and natural gas buses whereas rail hogs electricity, involves large energy transmission loses and will require construction of a new electrical power plant.
12. QUALITY: Some people assume buses provide inferior service, but buses of any quality can readily be bought: Luxury buses can be offered for those who prefer to pay more, less-expensive ones for those who prefer to save money. The main quality consideration for commuters is the time it takes to make the journey -- buses are quicker and easier than rail, plus you are more likely to get a seat rather than stand.
13. TOLLS: Critics claim that toll roads set up a system geared to those who can afford the tolls, and ignore those who cannot. Federal surveys show that in the places with HOT lanes the public approves of them across all income groups. Those with lower incomes approve of them because a) it reduces traffic congestion on nearby freeways at no cost to those not using HOT lanes, and b) it provides reliability to make those important appointments, which we all have regardless of income. If you are running late, paying $4 to jump on the HOT lanes and get there on time can easily be worth it. Without HOT Lanes, travelers will pay a toll anyway for a ticket if they ride a rail, or in wasted time if they drive stuck in congested freeway lanes. Affordable express bus service will be enhanced.
14. CARS: Some charge that HOT lanes encourage rather than discourage car use, but HOT lanes are not freeways and their toll charges do not encourage auto travel. Adding a lane will not increase the number of cars on the road, for that is controlled by the number of jobs at destinations -- just like adding a maternity hospital does not increase the number of babies, it just makes it easier for them to arrive. HOT Lanes are primarily mass transit for express buses and carpools,

which will lure drivers away from single-occupant cars.
15. DENSITY: Rail transit relies on high-density residential patterns to support it, with most riders living in high-rise apartments along the route, while the HOT lane can be easily reached by people living in more dispersed communities like we have on Oahu. Rail planners envision social engineering on a grand scale to force new housing into dense "TOD" patterns near stations (Transit Oriented Development). Such rail stations are magnets for crime. We do not have this density along the proposed route, nor do we have the population size. The smallest American city with heavy rail, Cleveland, has twice our population. Increased residential densities can make sense for the environment, but they can be better supported by a well-planned bus system that will allow more flexible distribution of settlements. In this way communities can grow in a natural way with different densities in various locations, increasing the opportunities for affordable housing and mixed-use neighborhoods with shops and jobs nearby, rather than congested housing along one narrow rail line. Rail lines are fixed and cannot respond to changes in employment and land use, whereas bus service can be rerouted and shifted over time to correspond with Oahu's changing transportation needs.
16. BIASED STUDIES: The city's Alternatives Analysis failed to provide any examination of the HOT Lane alternative, only vaguely considering "managed lanes" with a superficial and biased approach: The projected costs were grossly exaggerated, provided no access ramps along the route, included 6,200 unnecessary parking stalls, offered dubious ridership forecasts, had excessive $6 toll, removed the existing HOV zipper lane, resulting in a net of only one new lane, and then added the burden of stations on the busway - but no stations are required.
17. POLITICS: Unfortunately the city administration is completely close-minded about this critical issue and is determined to push rail at all costs. The city administration's biased EIS process is giving no consideration to the HOT Lane option. The city has pretended to listen to the public with superficial community meetings, biased transit symposiums and rigged advisory panels, but all these phony efforts have been a farce that were selling rail and manipulating public opinion rather than honestly listening to alternative viewpoints.
Section 7 transit debate
Please address each paragraph specifically, and explain why you agree or disagree.

1. There is no room on the ground to relieve the Leeward situation -- if you don't accept elevated you are out of the discussion. Buses can utilize this guideway better than rail because: buses can pick people up in our dispersed communities and drive directly onto the guideway without transfer. An expanded bus system would utilize regional bus stations, mostly in existing shopping/parking areas, that people could get to by a) driving, b) walking, c) shuttle bus, d) bicycle or moped. Train stations will not have such versatile access modes, nor will they be as close to our dispersed, existing residences.

2. Modern, express 3-piece articulated buses can carry 150 people. Again, as below, it comes down to ridership -- the bus reaches out to more places so will attract more riders, rail will fail due to lack of

customers, so that rail driver who could be pulling 300 people is stuck on empty, especially in off-peak hours. Bicycles can be easily accommodated on board.

3. Oahu needs considerable provision of new services, based on regional bus stations people can reach as detailed above, and from those stations there will be express buses which drive in from the suburb mixed with reasonable traffic, then enter the guideway at the H1-H2 merge in Waipahu, flying over the congestion non-stop! Please look at the proposed travel times projected for rail-they are worse than driving through the congestion. Don't project current bus conditions into our future, which will be a much different system.
4. The express bus can reach town without stopping every mile at a station, 10 miles in 10 minutes, much faster than rail.---
5. These new buses will be a different mode altogether because they will have true express lanes, so don't compare it to the present situation. Bus = 10 minutes; rail = 60 minutes, Check the city's alternative analysis charts.
6. The biggest rail handicap is transfers. A) leave home, b) travel to rail by bus - no-one lives in walking distance of proposed stations, which will have no parking c) walk from bus to rail station d) ride rail e) depart rail station and probably transfer again to reach destination. Then in the afternoon, f) g) h) i) j) do the same things again to get home.-
7. The big problems are the walk, the climb, the walk, the wait, the walk, etc.
8. Cost difference is a major factor. $6 billion for rail versus $2 billion for bus guideway construction. Look to Tampa, which built a 6-mile 3-lane, elevated viaduct for 300 million last year. This is not rocket science. It is just possible that tolls could pay for the whole thing.
9. Many other communities are building HOT lanes for bus, vanpools and toll-paying cars, but comparisons with other places is very misleading and therefore, dangerous. While we can learn many general principles from studying other places, direct equation with cities such as Vancouver, which is often pointed to by our Council and Administration as a model for us, are inappropriate because we are unique and must deal with our special situation in our own way. For example, population in greater Vancouver metropolitan area is 2.1 million people and skyrocketing along at 6.5% annual growth, compared to .9 million in Honolulu, growing at only .7% annually. Furthermore, Vancouver is a leader in "smart growth" with major development of high density housing downtown to the point where nearly as many commuters leave downtown in the morning as arrive.
10. Operational costs that theoretically tip in favor of rail assume that rail succeeds in attracting customers, which I seriously doubt - whereas express buses can, and those bus service levels can be easily adjusted to meet demands, unlike rail where the empty trains must keep on rolling, throwing good money after bad.

11. The old BRT was a ridiculous plan, taking away existing lanes for buses from a city that already is last in the nation for lanes per-capita. BRT was preposterous. Don't compare our current proposals to Harris, or to anywhere else, Those arguments ring hollow and suggest you have no real case if you have to go after straw men.

12. Of course, you realize our electricity comes from fossil fuels, petroleum no less. The rail will be an energy hog, requiring power 20 hours every day. Bus and HOV vehicles are evolving as we speak, soon running on alternative fuels. BTU per-capita of rail versus car is surprisingly close, and with new technology, free-flowing autos will soon pass rail in efficiency -- and again, a well-planned bus system of the type we are suggesting will run energy circles around the empty train. When the bus or vehicle is not in use, zero energy and emissions. Rail, all the time, empty, stopped, or going, is burning and polluting.

13. In addition, there are many other arguments for a HOT lane guideway. It can be utilized by vanpools and carpools. It can also be used by cars paying tolls to help fund it, perhaps only in the early years while HOV occupancy builds. After 5 or 10 years, if HOV service demands, cars could be excluded, but in the meantime tolls have helped pay for the system. All these vehicles can be properly dispersed at the town end with adequate off-ramps and some new parking facilities (connected to work places by shuttle service).
14. Sensible urban planning can devise a settlement pattern of new housing built in medium densities, new towns, that will encourage use of bus transit. Rail, on the hand, would seem to require high-density, high-rise, air-conditioned, expensive, un-Hawaiian housing, the so-called TOD, transit oriented development, which has not been working out well in several mainland communities, including Portland.
15. Getting people to use rail requires major social engineering, changing people's behavior and housing preferences, which is nearly impossible. This new generation of rail riders would either have to live walking distance from a station, in expensive, high-density clusters, or get to the train via transfer, and transfer again at destination. The psychological cost of time spent during transfer is much higher than that of time spent sitting in a vehicle. Less social engineering is needed to get people onto an effective bus or vanpool system, because it can pick them up closer to existing homes and get them to destinations with fewer transfers. New housing of transit-friendly medium density will ba more acceptable to people than air-conditioned, expensive, crowded skyscraper condos.
Section 8 City Myths on Rail Transit These are responses to public statements made by city officials:
Please address each paragraph specifically, and explain why you agree or disagree.

1. This memo prasents a rebuttal to various incorrect statements made by Honolulu government officials about the supposed advantages of rail. Our basic complaint is that the city keeps claiming rail would better serve our community than alternatives, such as HOT Lanes (High Occupancy and Toll Lanes), using incorrect information that misleads the public.
2. Main myths "Rail, if you compare it to a busway or a bus system, is head and shoulders above something like that (busway) in terms of 1. speed, 2. capacity, 3. reliability, 4. safety, 5&6.capital cost, even, operating and maintenance costs, 7. pollution, there's no comparison, there's no comparison. 8. Honolulu needs to move, I would say, 200 to 300 thousand people a day and only one kind of system would do it and that's a high-speed, high-capacity, rail system and that is why I am so in

favor of it."
3. Speed? The city's alternatives analysis shows that for the 19 miles from Kapolei to Downtown it's going to take 65 minutes by train. That's 20 miles per hour. He's saying 19 miles in 65 minutes. The alternatives analysis, that's the official assessment of what it will take with the rail line. Trains stop at every station, which is like elevators in thirty-story buildings stopping at every floor. This makes the trains quite slow. For example, from Kapolei to Downtown, a distance of 19 miles, the journey by train is forecast by the City's Alternatives Analysis http://www.honolulutransit.com/more_info/library/files/Alterntives_Analysis_Chapter3_to_End.pdf)
(page 3-11) to take 49 minutes if you drive to the station or 65 minutes if you walk/bus to the station
http://www.honolulutransit.com/more_info/library/files/Altemtives_Analysis_Chapter3_to_End.pdf This agrees with federal government data showing urban transit trains averaging only 23.5 mph. There is no "whoosh" with trains. On the other hand, buses on uncongested High-Occupancy Toll (HOT) lanes will average 60 mph and then 15-20 mph in normal traffic. It does not take much of the journey to be done on the HOT lanes to get an average speed far higher than a train.

4. The capacity of the projected rail line is 6,000 riders per hour in the peak direction with an ability to expand that to 10,000 per hour maximum. We can compare that to New Jersey's I-495 single bus lane carrying 32,600 passengers per hour. In the face of that, it is ridiculous to discuss a two-lane HOT lanes facility, giving priority to buses, not having the capacity of a rail line. The Parson Corp. HOV Facilities Manual says of rail and busways that, "Both modes can serve the person carrying capacity needs of about any corridor in North America." During the non-peak hours there'll be too much capacity if it's a rail. You'll have a 300-person vehicle rumbling through mostly empty every 6-10 minutes, whereas a common express bus can be coming through using far less energy and even more frequently or less frequently, as needed. www.honolulutraffic.com/passperhour.htm
5. Myth 3: Reliability? The biggest problem with rail transit is strikes (and suicides). Strikes are a major headache for rail transit users in the mainland because every so often they go on strike. They'll be out days on end. It takes them so much longer to get ridership back up to where it was after a strike. If you were to put in a rail system, whatever union is controlling the train is going to have an immense amount of power over the city. When a rail car breaks down the entire system will cease functioning, perhaps for days, causing major inconvenience.
6. Myth 4: Safety? Gangs, graffiti and crime around train stations. It's a magnet for this kind of stuff. Safe? All rail systems have to have transit police. Vancouver, San Francisco, Washington, etc...rail systems have transit police. We don't have transit police on our bus system. Are police accounted for in the alternatives analysis as part of the budget? No, they're not mentioned. We've brought that up. It's an issue. It's expensive. When they put in the blue (rail) line in LA the eventual bill turned out to be millions of dollars a year to put in a sufficient transit police in place to hold the crime down.
7. Myth 5: Costs? Saying that the capital cost is less than the HOT lanes option (High Occupancy Toll) is also absurd. It's really laughable to say

that a simple, elevated highway built by the lowest bidder is going to cost more per mile than a non-bid, elevated rail line with trains, computers, transformer stations. Each station is 270 feet long, 50 feet wide with elevators, escalators, stairs and generators to pull the train to the closest station so that the people don't get stranded between stations in a power outage. There can be no comparison. How can they be so off on the cost? Well, they have consultants who boast about being cMythnt-focused. In other words, they'll do whatever the cMythnt wants them to do. And the cMythnt wants them to show that HOT lanes are not competitive with rail.

8. Myth 6: The city has exaggerated the cost for HOT lanes to $2.6 BILLION. A comparable facility, the Tampa Expressway cost $400 million. When you've got a facility built for 400 million you cannot justify one for 9 times that amount in Honolulu. The 400 million dollar one in Tampa - how long is it? About 12 miles but it's 3 lanes wide. The one that we propose is 2 lanes wide. The cost per mile of rail in Honolulu is estimated by the City to be the same as the Washington, D.C. Dulles extension. But the cost of a reversible expressway for HOT lanes is estimated by the City to be over five (5) times the actual built cost of an already built system in Tampa, Florida!

9. Myth 7: Pollution? When cars are traveling at uncongested speeds, the pollution emissions are far less than on congested freeways. Speed up the auto traffic and we will get far less pollution. http://www.itre.ncsu.edu/ITREmain/research/documents/Emissions_Reduction-TrafficMngt.pdf

10. Efficient express buses that circulate in communities then drive onto HOT Lanes would attract more riders than rail, further reducing automobile usage and congestion.

11. Myth 8: 250,000 riders? Currently, 7% of Oahu trips are by public transit. This would need to triple, to 20% to reach 250,000 riders, which has never happened anywhere in the U.S. or Canada. Nationally transit ridership share has been going down, way down, not up. At present only about 75,000 people per day use transit.2. It would mean increasing transit users by 300 percent when the population is only forecast to increase by 28 percent for 2005 to 2030. This means increasing transit's market share by 260 percent. Bearing in mind that no metro area in the country has increased the percentage of commuters using transit over any 20 years of Census taking Where is he getting his numbers? (ftp://ftp.abag.ca.gov/pub/mtc/census2000/JTW_Trends/PDF/FullReport.pdf) (p. 4-9).

12. Myth 9: Energy? "Rail is better in terms of the energy consumption."Well-managed HOT Lanes can have a lower "carbon footprint" generating less carbon dioxide, than rail. Bus riders will use a high-occupancy lane going non-stop at 60 mph. Cars on HOT lanes will go faster and take less time on the road. Cars on existing highways will benefit from reduced congestion. Everybody goes faster. Two HOT Lanes carry as many vehicles as four lanes of regular, congested traffic. HOT lanes do not get congested, so the traffic is free-flowing and more efficient. Energy use at 20mph is 25 percent greater than at 55-60 mph. See http://www.fueleconomy.gov/feg/driveHabits.shtml for U.S. Dept. of Energy data. Construction of the rail line and huge stations would take an immense amount of energy.

13. Myth 10: Electricity? All of Honolulu's electricity is generated by burning petroleum, by far the highest level in the country, and yet the city's cost estimates for rail do not even include the expense of building a new power plant, let alone plans for one that runs on some new, unnamed technology. Battery-powered cars in the future will be charged overnight when electricity costs are at a a minimum, but rail would draw massive power during existing peak periods. The rail system will require huge amounts of electricity 20 hours every day, even if it is running empty. Each station will require its own emergency generator.
14. Myth 11: Vancouver Skytrain is running a profit: "Last year it made 2.72 million dollars."
A profit? Vancouver's Skytrain is integrated financially with their buses, ferries, and other elements of public transportation. Fare revenues for Skytrain cannot be calculated since one ticket allows transfers between trains and buses. Their financial report does not break out separate fare revenues for Skytrain. Total subsidies for Translink were $236.7 million in 2006. Any talk of Skytrain making a profit is absurd.
15. Myth 12: in Vancouver "last year car usage decreased by 5 billion kilometers (because of Skytrain)."The number of automobiles is actually increasing by 20,000 per year. This automobile growth is creating gridlock on Greater Vancouver's road network, which has had no significant improvements since the 1980s. In Vancouver, rising congestion reduces quality of life and increases costs. Population has grown by 750,000 people in the Vancouver region over the past 20 years and is anticipated to grow to over three million by 2031. With a rapidly growing population twice our size, concentrated in well-planned urban densities, Vancouver makes a very poor comparison. Greater Vancouver residents consistently rate transportation as the number one issue in the region.
16. Myth 13: No bus system can recover all its costs. Where do we start? Buenos Aires' 15,000 buses are privately-owned and profitable. Atlantic City's 190 13-passenger buses are privately owned and profitable. Source.
http://www.specialtyretail.net/issues/january99/acretail.htm Not only are Hong Kong's buses profitable and so are those of the rest of China. Source. http://www1.cei.gov.cn/ce/doc/cen3/200501201828.htm Throughout Asia and South America profitable bus systems abound. It is only through political choice that our bus system is subsidized by $140 million annually. In 1971 our bus system was profitable, but then the City took it over and began operating all kinds of unprofitable routes such as a trip completely around the island for $2.
http://www.honolulutraffic.com/Pickrell_xv.pdf
17. Myth 14 "Let's take Pittsburgh. They did both, an elevated busway and a light rail system. They projected 50,000 passengers a day for the busway. Their actual ridership today after seven years is 9,500 - one fifth of what they projected." The Federal Transit Administration's website shows that Pittsburgh's busways carry 52,000 riders per day - more than twice as much as carried by light rail. Source:
http://www.fta.dot.gov/printer_friendly/research_4289.html
18. "For the light rail system they (Pittsburgh) projected 30,000 passengers. Last year it was up to 27,000 riders, up 9.4 percent from the year before. So people are actually moving from buses to rail."
19. Pittsburgh light rail makes its forecast? The official ridership forecast

was 90,500 riders per average weekday versus the actual ridership achieved of 30,600 - 66 percent less than forecast. Last year the riders were not up to 27,000 but rather down to 23,200, a significant decline from the 30,600 achieved in 1989. (Source: http://www.apta.com/research/stats/ridership/riderep/documents/06q4lr.pdf) National Transit Data Program. If we review the disaggregated ridership data for Pittsburgh from 1996, the earMythst available from APTA, to 2004, the last official data, we find that bus ridership declined slightly less than rail ridership during this period. More importantly, the U.S. Census shows that in 1980, before Pittsburgh built its new rail lines and busways, 106,200 Pittsburgh workers commuted using public transportation. That declined to 65,500 by the 2000 Census. This data is contained in the U.S. Department of Transportation report, Urban Rail Transit Projects: Forecast versus Actual Ridership and Cost (DOT-T-91-04), which shows the forecast (Source: National Transit Data Program at http://www.apta.com/research/stats/ridership/riderep/documents/06q4lr.pdf As for busways: Source: http://www.fta.dot.gov/printer_friendly/research_4289.htmlMoving from buses to rail? Source: http://www.apta.com/research/stats/ridership/ Source: Journey to Work Trends in the U.S. & its Major Metropolitan Areas. (FHWA-EP-03-058) page 4-9.

20. Myth 16: "the public transit use is actually a 30% increase since 1995"

21. But the broad picture, according to U.S. Census data, shows that from 1990 to 2000 there was a decline in people using transit to commute.

22. Myth 17: "We think the new (rail) riders is gonna be in the neighborhood of 30-40,000 riders."

23. This claim is based on ridership forecast by the consulting firm, Parsons Brinkerhoff, whose previous forecast for Honolulu were wildly inaccurate, grossly overestimating increases in bus riders when in reality we have seen ridership decreases.

24. Myth 18: There is a balance of spending for various transportation projects in the coming decades: "we're going to be spending about 3 1/2 billion dollars in the next 25 years on highway improvements as well."

25. But what kind of balance is this, spending nearly 200% more ($6 Billion) for a rail project that might carry at best 10% of our riders?

26. Myth 19: "We're projecting in some areas commute times to increase to three hours one-way."

27. This is another scare tactic. The city's own Altarnative Analysis shows that the worst commute in the year 2030 if nothing is done, the no-build option, from Waianae to UH Manoa, would be 105 minutes, 40% less than Okino's preposterous statement.

28. Myth 20: "In 1990 we did a...study which shows that even with a busway you'd have 60% of the people transferring....It doesn't reduce transfers, it doesn't reduce transfers."

29. This is another red herring. The 1990 busway survey was done as part of the EIS for the 1992 rail proposal, so again, the mayor talked to his cMythnt-focused planning company and told them to make rail look good and buses look bad. They came up with a grossly-over engineered busway designed with elevated stations on it and no ramps

coming down to the ground, so of course riders would have to transfer in such a poorly-designed system. But there is no need for bus stations up on an elevated busway. Instead, these bus stations belong in the community at ground level, perhaps at existing shopping centers and other busy gathering spots. One of the great advantages of an express bus system is that is will take riders from origin to destination with few if any transfers.

30. Myth 21: Busways studied. Unfortunately the city has never included adequate busway ramps in its biased alternative analysis, yet has the nerve to criticize an engineer who has done such studies. Ramps are an important issue that illustrate the advantage of HOT lanes over the railroad. Ramps along a guideway allow buses to drive on or off and directly bring passengers where they are going without a transfer.

BEYOND THE MYTHS: PROBLEMS WITH PROCESS and PRELIMINARY ENGINEERING:

31. The city administration is following dangerous, backwards planning techniques by proceeding with Preliminary Engineering before the technology has been chosen and before the Environmental Impact Study has baen done. Early in the process the Locally Preferred Alternative was determined by the City Council to be a "Fixed Guideway" without specifying what technology will travel on the guideway. It could be express bus, as some Councilmembers are advocating, or rail, or something else.

32. The city's planning procedure is essentially backwards, conducting preliminary engineering before the EIS is done. Why did we spend millions on preliminary engineering before the environmental impact statement is approved? We are spending a lot of public money without really knowing what the system is and if the system fits. The normal next step after the alternative analysis, which has been partly concluded, is the EIS. Once you have an EIS that is approved and signed by the Governor, the Mayor and the Federal government, then you go into preliminary engineering. If for some reason we reject the EIS, the preliminary engineering could be useless. Thrown out the window.

33. All of the above present serious concerns for Oahu taxpayers, who deserve true information, because we are the ones who would pay for it -- the largest public project in the history of Hawaii by far, costing the typical family of four about $24,000 to build and many more dollars to operate and maintain. Unfortunately the proposed rail would do little if anything to solve our traffic problems, but there are much better options. Contrary to what the Mayor publicly declares, rail is not a "done deal."

34. Our position is that we should instead build a new elevated structure for HOT lanes from the Leeward side that would be used by a mix of express buses and carpools that ride free, along with some toll-paying automobiles. The city has consistently failed to study HOT Lanes as an alternative, despite their many advantages, which include lower costs and much more efficiency than rail.

Section 9 Rail Transit Daily Journey Segments

Please address each statement specifically, and explain why you agree or disagree.

1. TRAIN TRANSFERS and WAITING: Transit studies have shown that people hate to transfer and wait. Rail riders would have to transfer

many times and stand around waiting on their daily round-trip, which would typically need 20 total daily segments:
2. go to a bus stop
3. wait for the bus
4. ride a bus to the rail
5. walk to the platform
6. wait for train
7. ride the rail making many stops
8. walk from the rail to another bus stop
9. wait
10. ride a bus
11. walk to work;
a. same problems coming home.
12. Even if we grant that some commuters can walk to work from the end station, they still require 14 daily segments.
13. Those workers using a spur line to the airport will still have 20 segments in this typical scenario: add to the 14 segments above the 6 extra r/t segments for an airport worker on the newly-proposed spur: 1) walk to connecting train 2) wait for train (up to 15 minutes wait) 3) ride train, same in reverse.
14. On the other hand, express bus riders do not need many segments: Travel to a regional bus station, wait, ride non-stop to destination, walk to work. 4 components, same coming home.
15. Regarding tourist use of rail: what tourist would ever haul their baggage so far -- to a train, walk a few blocks in a shopping mall to transfer to some trolley, then walk several blocks in Waikiki to their hotel? This mayor is spinning a fantasy right out of Alice in Wonderland.
Section 10 Please address each paragraph specifically, and explain why you agree or disagree.
Busway systems have the following advantages:
1. Buses do not need stations on the busway, as they can collect and deposit.
passengers close the origins and destinations of their trips, without passengers having to change modes.
2. Space between buses can be used by other vehicles, particularly taxis and
car-pools. If these vehicles pay tolls (which can be collected electronically,
without cars having to stop) the tolls can pay for much or all of the transit
system.
3. Rail service is provided by a monopoly, generally unionized. A busway can
carry buses of different companies providing competitive service. That unionized rail staff can cause problems is evident from the current rail strike in Paris.
4. Bus systems have superior carrying capacity. Five-hundred buses an hour,
carrying 25,000 seated passengers, enter the New York City main bus station
daily on one dedicated bus lane. And a good traffic lane can accommodate over
1,000 buses an hour, carrying 50,000 seated passengers! Rail services

cannot
accommodate such high traffic volumes without forcing passengers to stand.
5. Rail services generally stop at each station along the line. Buses utilizing a busway can travel non-stop from passenger origin to destination.
This gives bus service a superiority in door-to-door speed.
6. Busways are robust and can quickly be repaired in an emergency. Rail
structures cannot quickly be replaced or repaired if damaged.
7. The main disadvantage of all-bus systems is their low cost, so people assume
they give inferior service. But buses of any quality can readily be bought: Luxury buses for those who prefer to pay for luxury, less-expensive ones
for those who prefer to save money. High-capacity busways on dedicated lanes
operate in Curitiba, Bogota, Brisbane, Ottawa, end Port-of-Spain.
Section 11 Comparisons
Please address each paragraph specifically, and explain why you agree or disagree.

HOT Lanes
Rail
DESCRIPTION
1. 10 mile, elevated 3-lane, reversible, high occupancy highway from the H1-H2 merge to the Iwilei edge of downtown, for express bus, carpool and some toll-paying cars.
2. 28-mile elevated train running from Kapolei eventually to UH Manoa, with 25 stations, some of them 80 feet above ground.
COST
3. Less than $1 billion. Some of this will be paid by the federal government, some by tolls, with less than half by taxpayers.
4. More than $6 billion. This amounts to $24,000 for each family of four on Oahu. There is no guarantee of federal funds.

TRAFFIC CONGESTION
5. HOT Lanes will reduce congestion on H1 by up to 35%. Many drivers will use the new lanes and more commuters will be attracted by high-speed express buses.
6. City official studies show that future traffic congestion with rail will be far worse than it is today, increasing from the current 15% overload to 80% in 2030.
ENERGY SAVINGS
7. HOT Lanes will be more efficient, reducing traffic congestion and energy consumption, encouraging ridership in energy-saving carpools and express buses. New cars will get much better mileage, while the train will never improve.
8. Rail transit uses more energy per passenger mile than the average automobile according to the U.S. Dept. of Energy. For most of the 20 hours a day they run, trains are nearly empty. With rail, autos will be stuck in gridlock, wasting gas.
ENVIRONMENT

9. HOT Lanes would only extend for 10 miles along existing highways, such as Kamehameha Highway in Aiea and Nimitz Highway, not through residential neighborhoods.
10. An elevated train would be an ugly, noisy intrusion running for 34 miles through our neighborhoods (imagine elevated tracks down Kuhio Ave, ruining Waikiki).

RIDERSHIP & CAPACITY

11. An expanded express bus system would attract many more riders. Total passenger capacity would be at least twice as high as rail.
12. With rail transit ridership will only increase by 2%. This is a ridiculously small increase, costing us about $600,000 for each new rider.

CONVENIENCE

13. Express bus riders: 1) Travel to a regional bus station, 2) wait, 3) ride non-stop to destination (avg speed 50 mph), 4) walk to work. Same coming home. Commuters in cars and carpools would have total convenience and personal control over their daily travels.
14. Rail riders would need up to 20 daily journey segments: 1) go from home to bus stop 2) wait for bus 3) ride bus to rail 4) walk to platform 5) wait for train 6) ride rail making many stops 7) walk from rail to bus stop 8) wait 9) ride bus 10) walk to work; 11-20) same coming home.

LAND DEVELOPMENT

15. HOT Lanes support expanded bus mass transit that will encourage good land use planning with low-rise, medium density communities that would be efficient and very livable. At the same time these lanes provide support for existing housing on most of Oahu, not just a narrow concentrated corridor where few people currently live.
16. Rail will supposedly create high density development around stations, protecting the rest of the island. Such utopian schemes have not been happening with mainland rail systems, and even if they did occur, do we want to force our future population to live in high-rise, air-conditioned buildings crowded along a Leeward corridor?

TAX INCREASE

17. No further tax hikes. $1 billion for HOT Lanes will be paid by a combination of federal funds, tolls, and some loca taxes, much less than public funds for rail.
18. The recent 1/2 percent excise tax increase will not be nearly enough to pay these huge bills, so property taxes will likely increase by 40% and more.

Section 12 The city's Alternative Analysis of Managed Lanes was faulty in several serious ways:
Please address each statement specifically, and explain why you agree or disagree.
-The city estimated Managed Lanes would cost $2.6 Billion despite the fact thet a similar system was built in Tampa Bay for $320 million in 2005.
-They removed the existing zipper lane, resulting in a net gain of just one new lane rathar than the 2 or 3 lanes we are proposing.
-They included bus stations on the lanes, which are totally unnecessary and would add considerable expense.

-They failed to include access ramps along the route so vehicles can enter and exit. Instead they just dropped all the vehicles to street level downtown at a traffic light with no management plan.

Section 13 cost in other places
Please address each statement specifically, and explain why you agree or disagree.

How can you justify such high costs compared to other places?
Light rail costs in comparison to population size in various metro areas:

	Cost	population	Per capita cost
Dallas	$1,067,000,000	5,222,000	$204
Denver	$358,000,000	2,582,000	$139
Portland	$1,643,000,000	2,265,000	$725
Sacramento	$307,000,000	1,797,000	$171
Salt Lake	$376,000,000	1,334,000	$282
St. Louis	$464,000,000	2,604,000	$178
Pittsburgh	$1,051,000,000	2,571,000	$409
Honolulu	$6,400,000,000	940,000	$6,809

We would be the smallest metro area with a rail line and the most expensive. Portland spent the money, has bad congestion, running rail on what had been roads and existing rail beds, and still only 30% of their transit riders use rail the rest are in buses. Share of transit ridership in Portland remained flat from 1980 to 2000.
Section 14 Best Traffic Fix
Please address each paragraph specifically, and explain why you agree or disagree.
1. Traffic congestion for Leeward drivers is so horrible that people are desperate for anything that sounds like a solution. Rail has been pushed so hard and so often by the city that it seems like it should work, but unfortunately, rail would do next to nothing to solve the problem while wasting our precious resources. Here are some highlights of the major alternative to rail, which has received very little coverage in the media.
2. The best solution both to solve the traffic problem and encourage extensive use of mass transit is to construct a ten-mile elevated guideway for express buses, carpools, and perhaps some toll-paying cars. This guideway would leapfrog over the current choke-point between the Leeward bottleneck created at the H1-H2 merge and downtown, and it would come down to street level in Iwilei, not run through the heart of our city as an elevated blight like rail. It would provide a simple, elegant solution, cost under $1 billion and likely produce a 35% reduction in traffic while transporting many more people than a rail line.
3. Managed lanes, also called HOT Lanes, will not dump more cars into downtown as rail-supporters falsely claim, because the main focus is bus and carpool, thereby reducing auto traffic, with several ramps along the route that distribute vehicles to destinations other than downtown. With this bypass, existing streets can handle the added express buses.
4. This approach would be better and conserve more energy than a train for several reasons:

5. Rail is an energy hog, with energy consumption per passenger about the same as the average new car, based on studies by the federal government. (for more details see our web site: www.stoprailnow.com)
6. Cars and buses are becoming increasingly energy efficient, soon to run on batteries that will be inexpensively recharged overnight when electrical demand is low, while rail is an old technology already at its maximum energy efficiency level and will place heavy demand on electricity during peak periods.
7. HOT lanes will produce tremendous improvements in the bus system at a fraction of the cost of rail, result in a much greater use of mass transit, take cars off the road and benefit everyone.
8. An expanded bus system makes better use of the existing 500 bus stops and adds true express service for ALL COMMUNITIES, while encouraging environmentally-friendly, medium-density development.
9. These lanes do not need to run elevated for 30 miles through the heart of downtown, Waikiki and residential neighborhoods, so they will not create urban blight like rail would.
10. Any commuter on this island could easily travel a short distance to an express bus stop and board a modern vehicle (not today's bus) that features comfortable seats, wi-fi, coffee service, and most importantly, rapid, non-stop delivery to destinations. This efficiency and flexibility cannot be achieved with a rigid, linear rail line going to Kapolei. Leeward commuters will benefit most of all from this express bus system, reaching town in 30 minutes instead of the 60-minute rail journey requiring multiple transfers.
11. An enhanced bus system would benefit everybody except lobbyists for the construction industry and land-development. How often have we heard about the tremendous financial gains that will result from concentrated development around train stations, along with the massive up-zoning for high-density apartments that most of us don't want to live in?
12. The people of Oahu share common ground with our organization: we want to reduce congestion, encourage mass transit, make other traffic improvements and encourage wise land use development with adequate housing for our future needs. Rail contributes nothing to our common needs, hopes and dreams.
13. Rail would be too expensive, not effective, ugly, and prevent us from developing real solutions. Rail would increase the number of commuters using transit by only 1.3% while morning congestion on H-1 will grow 53% in the next 20 years, according to the city's own studies reported by Sean Hao (Adv. 7/15). With a likely $6 billion price tag, that pencils out to an expense of nearly $750,000 for EACH new transit rider, costing every Oahu family of four about $24,000.
14. In addition, rail would directly serve only the tiny fraction of Oahu's population that is within walking distance from its few proposed Leeward stations -- neighborhoods which currently are sparsely populated. Why does rail have public support at all? Well, the city has been spending millions of dollars for propaganda to mislead the public, leaving us largely uninformed about the pitfalls of rail or the advantages of non-rail alternatives.
15. We are all too familiar with the dilemma: thousands of commuters heading into the sun each morning on the H-1 which is full. And then again, in the afternoon heading back into the sun on H-1 which is full. It

is frustrating, it wastes gas and time every day. West Oahu and Central Oahu cannot be served by one freeway which is already full at rush hour. If this freeway is blocked, there are no alternatives. What about our ambulances, civil defense vehicles, and all the commercial vehicles that are also stuck?

16. New elevated lanes address these problems. It is a pity that rail does not.

-end-

DEPARTMENT OF TRANSPORTATION SERVICES

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June 11, 2010

RT2/09-299218

Mr. Dennis Callan
Stop Rail Now
1011 Prospect Street, Suite 702
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Dear Mr. Callan:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

General Comments

The capital plan for the Project is presented in Section 6.3 of the Final EIS. The capital plan took the economic downturn into account and reduced the anticipated General Excise and Use Tax (GET) surcharge collections to reflect that downturn based on conditions as of the first quarter of fiscal year 2010 using forecasts by the State Council on Revenue. Section 6.6 of the Final EIS also describes risks and uncertainties associated with these funding assumptions, which include changing economic conditions and the possibility of varying levels of revenue collection and project costs. The City will continue to refine revenue forecasts and cost estimates as the Project proceeds through FTA's New Starts process. The capital plan is a dynamic document that will be updated regularly as conditions warrant.

Capital costs of the Project, including finance charges, are expected to be fully paid for by a combination of FTA Section 5309 New Starts and FTA Section 5307 Funds from the Federal government and revenues from the County General Excise Tax Surcharge levied from 2007 through 2022 on Oahu. These sources of revenue are available only for public transportation purposes.

Regarding the Hawaii Department of Transportation's (HDOT) projects, they are not new projects. They are all contained in the latest Oahu Metropolitan Planning Organization (OahuMPO) Regional Transportation Plan (2008), and are the basis of the No Build Alternative used to evaluate the fixed guideway project as described in Chapter 2 of the Final EIS. The No Build Alternative is used as a baseline against which to compare the build alternative (i.e., fixed guideway), as well as being a stand-alone alternative. It is against this backdrop that the results are presented in the EIS. As discussed in Chapter 2 of the Final EIS, the No Build Alternative does not meet the Purpose and Need of the Project. Based on the Project's analysis, rail is needed in addition to all projects contained in the OahuMPO Plan, which includes all the State Projects.

A travel forecasting model was used to forecast roadway conditions in 2030, both with and without the Project. As described in Chapter 2 of the Final EIS, modeling took into account committed transportation projects anticipated to be operational by 2030, which includes the projects identified in the Highway Modernization Plan put forth by HDOT in 2009.

As shown in Tables 3-9 and 3-10 of the Final EIS, roadway conditions without the fixed guideway system would get worse, despite nearly $3 billion in planned roadway improvements in 2030. However, these tables also show that traffic volumes on the highway system will decrease with the fixed guideway system. As shown in Table 3-14 in the Final EIS, congestion will be worse in 2030 without the Project.

The State of Hawaii's Highway Modernization Plan, dated January 22, 2009, is an accelerated construction schedule for many of the projects listed in Table 2-3 of the Final EIS. These projects were included in the analysis of all alternatives in the Draft EIS, including the No Build Alternative.

The process of analyzing and screening alternatives included the analysis of a Managed Lane Alternative, which is substantially similar to the referenced high-occupancy toll (HOT) alternative. The main difference between the Managed Lane Alternative and the HOT alternative proposed in the comment letter is the configuration of ramps. The HOT facility proposed in the comment letter refers to an undisclosed number of additional access ramps compared to the configuration of the Managed Lane Alternative studied during the Alternatives Analysis phase. The only certain effect of additional ramps is a higher project cost for the added ramps compared to the Managed Lane Alternative. As documented in the Alternatives Analysis Report *(DTS 2006b, available under the "Library" tab on the project website www.honolulutransit.org) and explained more fully in Chapter 2 of the Final EIS, two options were considered for the Managed Lane Alternative—a Two-direction Option and a Two-lane Reversible Option. This alternative would have provided a two-lane elevated toll facility between Waipahu and Downtown Honolulu, with variable pricing strategies to maintain free-flow speeds for transit and high-occupancy vehicles (HOVs). The Two-direction Option would have served express buses operating in both directions during the entire day. To maintain free-flow*

speeds in the Two-direction Option, it would have been necessary to charge tolls to manage the number of HOVs using the facility. For the Two-lane Reversible Option, three-person HOVs would be allowed to use the facility for free, while single-occupant and two-person HOVs would have to pay a toll. The Two-lane Reversible Option was found to be the optimal of the two alternatives studied. Consideration of a full BRT option was not reasonable as it would have required dedicating a lane to the bus service which would have added substantially to the cost by requiring an added lane or, alternatively, reducing capacity for other vehicles by dedicating one of the two lanes for bus use. It would also not have provided a substantive operational improvement over express bus service functioning in free-flow conditions (presumably operating at preferred rates) maintained by charging a toll to single or low-occupant vehicles.

The findings of the Managed Lanes analysis are summarized in Chapter 2 of the Final EIS as follows: The Managed Lane Alternative was evaluated for its ability to meet project goals and objectives related to mobility and accessibility, supporting planned growth and economic development, constructability and cost, community and environmental quality, planning consistency and ultimately, to meet the requirements of the available funding in the form of the City's GET Surcharge program and, potentially, the FTA New Starts Program. While this alternative would have reduced congestion on parallel highways, system-wide traffic congestion would have been similar to the No Build Alternative as a result of increased traffic on arterials trying to access the facility. Total islandwide vehicle hours of delay would have increased with the Managed Lane Alternative compared to the No Build Alternative, indicating an increase in system-wide congestion (Table 2-2 of the Final EIS).

The Managed Lane Alternative would not have supported planned concentrated future population and employment growth because it would not provide concentrations of transit service that would serve as a nucleus for a more compact and efficient development plan. The Managed Lane Alternative would have provided little transit benefit at a high cost. As discussed in Chapter 6 of the Alternatives Analysis Report, *the cost-per-hour of transit-user benefits for the Managed Lane Alternative would have been two to three times higher than that for the Fixed Guideway Alternative. Similar to the Transportation System Management (TSM) Alternative, the Managed Lane Alternative would not have substantially improved service or access to transit for transit-dependent communities. No dedicated funding sources were identified for the Managed Lane Alternative. Neither the County GET Surcharge imposed by the City Council in 2006 nor the FTA New Starts Program provide funding for Managed Lanes as they do for fixed guideway. Other funding sources are available for roadways, but none are currently identified for a managed lane project in Honolulu. Funding sources are identified for the fixed guideway. Toll revenues from the Managed Lane Alternative would pay for ongoing operations and maintenance while remaining revenues would be used to repay debt incurred to construct the system.*

As stated in the Summary of the Alternatives Analysis Report, *the Managed Lane Alternative would have generated the greatest amount of air pollution, required the greatest amount of energy for transportation use, and would have resulted in the largest number of transportation noise impacts of all the alternatives evaluated. Because the Managed Lane Alternative would have served a shorter portion of the study corridor (approximately 16 miles compared to the 20 miles served by the fixed guideway), it would have resulted in fewer displacements and would have impacted fewer archaeological, cultural, and historic resources than the Fixed Guideway Alternative. The Managed Lane Alternative would not have affected*

any farmlands. Visually, the elevated structure would have extended a shorter distance, but it would have been more visually intrusive because its elevated structure, with a typical width of between 36 and 46 feet, would have been much wider than the Fixed Guideway Alternative.

After the Alternatives Analysis phase was completed, scoping was held to provide the public and agencies the opportunity to comment on March 28 and March 29, 2007, per 40 C.F.R. Part 1501.7. Several scoping comments were received requesting reconsideration of the Managed Lane Alternative that was considered and rejected during the Alternatives Analysis phase based on the information in Chapter 6 of the Alternatives Analysis and in the form of City Council action on December 6, 2007 to adopt the Fixed Guideway Alternative as the Locally Preferred Alternative (LPA) in Ordinance 07-001. Because no new information was provided that would have changed the findings of the Alternatives Analysis regarding the Managed Lane Alternative, it was not included in the Draft EIS for further consideration. Specifically, the discussion of BRT in the proposed reconsideration was similar to the bus operation studied in the Alternatives Analysis.

According to 23 CFR § 771.130, a Supplemental EIS is prepared when the Administration determines that:

> *(1) Changes to the proposed action would result in significant environmental impacts that were not evaluated in the EIS; or*
>
> *(2) New information or circumstances relevant to environmental concerns and bearing on the proposed action or its impacts would result in significant environmental impacts not evaluated in the EIS.*

Neither of these instances are applicable to the Honolulu High-Capacity Transit Corridor Project or demonstrated in the comment letter.

The Draft EIS does not reference a 30-percent decrease in congestion. As shown in Table 3-14 of the Draft EIS, there is approximately a 20-percent reduction in vehicle hours of delay (VHD) when comparing Build Alternatives to the No Build Alternative. (VHD is the time lost in congested conditions compared to the time it would take to travel without congestion.) The travel demand forecasting model has been refined since the Draft EIS to include non-home-based direct demand trips (trips that do not originate at home) during off-peak hours. The air passenger model, which forecasts travel in the corridor related to passengers arriving or departing at Honolulu International Airport, was also updated to reflect current conditions. Table 3-14 in the Final EIS shows an 18-percent reduction in VHD with the Project versus the No Build Alternative. With respect to traffic reductions, the Draft EIS reflects the results of the analysis conducted with the Project compared to the No Build Alternative. The figures have been updated for the Final EIS based on selection of the Airport Alternative and refinements to the travel demand forecasting model (e.g., non-home-based direct-demand trips during off-peak periods, air passenger model). In addition, the air passenger model was updated to reflect current conditions. The updated results continue to show that traffic will decrease with the addition of the Project compared to 2030 No Build conditions. The Final EIS includes the latest information.

Section 1

1–2. These comments provide information and are not related to the environmental analysis of the Project.

3. This comment is not related to the environmental analysis of the Project. As stated in Section 3.3.2 of the Final EIS, "With increasing traffic congestion over the last 20 years, scheduled trip times for bus routes have been lengthened to reflect the additional time each bus trip takes." The implementation of the fixed guideway system will allow for the redistribution of bus service hours to add service to the growing areas of Central, West, and East Oahu.

4. This comment is not related to the environmental analysis of the Project. Figure 3-7 in the Final EIS shows that transit travel times will be substantially shorter with the fixed guideway system than with the No Build Alternative.

5. This comment is not related to the environmental analysis of the Project. National trends show increasing transit ridership, and last year (2008) recorded the highest demand for public transportation in 52 years (APTA 2008 Ridership Report). National transit ridership has grown 18 percent over the past 10 years (2007 National Transit Summaries and Trends, National Transit Database). Honolulu transit ridership has grown over the past several years, recovering from three fare increases (July 1, 2001, July 1, 2003, October 1, 2003) and a month-long strike bus strike (FY 2004).

6. This comment is not related to the environmental analysis of the Project. As stated previously, Figure 3-7 in the Final EIS shows that transit travel times will be substantially shorter with the fixed guideway system than with the No Build Alternative. Table 3-14 of the Final EIS shows that VHD decreases 18 percent with the Project versus the No Build Alternative.

7. As noted above, national trends show transit ridership increases. Honolulu transit ridership has also increased over the past several years.

8. An analysis of congestion on the highway system is undertaken in the environmental review of the Project and is presented throughout Chapter 3 of the Final EIS. In addition, the relevance of the 2012 compared to 2000 data in your letter is unclear. There is no requirement to maintain congestion at 2000 levels. There are other ways to decrease or maintain traffic congestion, including increasing the number of people per vehicle. The fixed guideway project, as currently planned, would carry a minimum of 8,500 people per hour per direction during peak periods, thus reducing traffic congestion as compared to the No Build Alternative. It is unclear what is meant by the "lower table" in the comment letter (no tables are found in the comment letter).

9. Your planned use of terminology is noted.

10. The Final EIS discusses both bus and rail transit. As noted in Section 2.5.6 of the Final EIS, "bus service will be enhanced and the bus network will be modified to coordinate with the fixed guideway system."

11-14. These comments are not related to the environmental analysis of the Project.

15. See response above (Section 1, Response 5) regarding national trends showing increases in transit ridership.

16-17. These comments are not related to the environmental analysis of the Project.

18. This comment is not related to the environmental analysis of the Project. In addition, Houston does have a rail system.

19-21. These comments are not related to the environmental analysis of the Project.

22. A travel demand forecasting model was used to forecast traffic volumes at six screenlines (i.e., virtual lines that cut across the corridor used to measure the performance of the transportation system at that location) in 2030, both with and without the fixed guideway system. As seen in Tables 3-9 and 3-10 in the Final EIS, traffic volumes in 2030 will be reduced with the Project versus with the No Build Alternative. For instance, with the fixed guideway system there is an 11 percent reduction in traffic at the Kalauao screenline in the Koko Head-bound direction during the a.m. peak hour (weekday morning one-hour period of highest traffic; aka morning rush hour) and a 10 percent reduction in the Ewa-bound direction during the p.m. peak hour (weekday afternoon one-hour period of highest traffic; aka evening rush hour) when compared to conditions without the fixed guideway.

23. The travel forecasting model uses guidelines established by FTA for all projects seeking federal funds from the New Starts program. According to modeling done for the Project, the fixed guideway system will relieve traffic congestion compared to the No Build Alternative. Table 3-14 in the Final EIS shows an 18 percent reduction in VHD in 2030 with the Project compared to the No Build Alternative. As stated in the previous response, traffic congestion at the Kalauao screenline will improve with the Project compared to No Build conditions. Accordingly, the Project will provide benefits to residents along the Leeward corridor.

24. As stated previously (Section 1, Response 5), rail has reduced traffic congestion within the corridor within which it is built (see Salt Lake City, Dallas, etc.).

25. As noted above (General Comments), a Managed Lane Alternative meeting this general description was fully evaluated in the Alternatives Analysis phase of the Project and was demonstrated to be less effective than a Fixed Guideway Alternative. The HOT facility was not only less effective in meeting the Project's Purpose and Need, but it was also less effective financially because it does not qualify for the GET surcharge funds or Federal New Starts funding. Tolls would also have to be high to pay for the cost of the elevated lanes (approximately $6.60 during the peak period). Tolls would still only generate less than a quarter of the capital funding needed to build the system. This toll rate is comparable to similar systems where tolls are as high as $10.00 during peak times (e.g., Orange County, CA—SR 91 HOT lanes).

26-27. As noted above, the Managed Lane Alternative was fully evaluated in the Alternatives Analysis phase and was demonstrated to be less effective than a Fixed Guideway Alternative. The Managed Lane Alternative was eliminated from further consideration based on the information in Chapter 6 of the Alternatives Analysis *and, formally, in the form of City Council action on December 6, 2007 to adopt the Fixed Guideway Alternative as the Locally*

Preferred Alternative (LPA) in Ordinance 07-001 While there are minor differences in access locations in the proposal mentioned in the comment compared to the design addressed in the Alternatives Analysis, they add substantially to the cost of the system and afford negligible benefit to a comparatively ineffective Managed Lane Alternative. Moreover, the variation proposed does not reflect a substantive departure from the studied concept. Therefore, it has not been considered as a project alternative in the Draft or Final EISs.

28. The Draft and Final EISs do not consider HOT lanes, as those were eliminated as noted in the previous response during the Alternatives Analysis process, as discussed in Chapter 2 of the Final EIS. As mentioned earlier in the "General Comments" section, while this alternative would have reduced congestion on parallel highways, system-wide traffic congestion would have been similar to the No Build Alternative as a result of increased traffic on arterials trying to access the facility. Total islandwide vehicle hours of delay would have increased with this alternative compared to the No Build Alternative, indicating an increase in system-wide congestion (Table 2-2 of the Final EIS). This alternative would not have supported planned concentrated future population and employment growth because it would not provide concentrations of transit service that would serve as a nucleus for a more compact and efficient development plan. This alternative would have provided little transit benefit at a high cost and would not have substantially improved service or access to transit for transit-dependent communities. For these reasons, this alternative did not meet the Project Purpose and Need and was eliminated from further consideration.

29. See previous explanations about why HOT lanes were not included in the Draft or Final EISs. While the BRT/HOT alternative would have reduced congestion on parallel highways, system-wide traffic congestion would have been similar to the No Build Alternative as a result of increased traffic on arterials trying to access the facility. Total islandwide VHD would have increased with the Managed Lane Alternative compared to the No Build Alternative, indicating an increase in systemwide congestion (Table 2-2 of the Final EIS); the same result is anticipated for the BRT/HOT alternative.

30. As stated previously, two options were considered for the Managed Lane Alternative—Two-direction and Two-lane Reversible. This alternative "would have provided a two-lane elevated toll facility between Waipahu and Downtown Honolulu, with variable pricing strategies to maintain free-flow speeds for transit and high-occupancy vehicles (HOVs)." The Alternatives Analysis phase found that this alternative had inferior performance compared to the fixed guideway alternative for reasons previously explained (as discussed previously under the "General Comments" section of this letter).

31. The Alternatives Analysis Report *indicated that transit reliability would not have been improved except for express bus service operation in the managed lanes. While this alternative would have slightly reduced congestion on parallel highways, system-wide traffic congestion would have been similar to the No Build Alternative as a result of increased traffic on arterials trying to access the facility. Total islandwide VHD would have increased with the Managed Lane Alternative compared to the No Build Alternative, indicating an increase in system-wide congestion. As stated in Section 2.5.1 of the Final EIS, the rail system will achieve an average of 30 mph or greater, including dwell times at stations. The managed lane option would allow favorable speeds on the facility itself if free flow conditions could be maintained (such as through imposition of a high enough variable toll), but the alternative suffers at either*

end and in travel to and from the facility, leading to overall system speeds that are slower than the fixed guideway.

32. The capital plan for the Project is presented in Section 6.3 of the Final EIS, including a description of the amount of funding anticipated from various sources. Section 6.6 of the Final EIS describes risks and uncertainties associated with these funding assumptions. To clarify, the reference to first-phase construction segments is inconsistent with the information in the Final EIS in Chapter 2, and the crossing of the H-1 Freeway at University Avenue is not a part of the Final EIS Project but is a potential future extension, which will be evaluated separately at a later date if the extension is pursued.

33. As stated above, Section 6.3 of the Final EIS describes the anticipated funding sources for the capital cost of the Project. Capital costs of the Project, including finance charges, are expected to be fully paid by a combination of FTA Section 5309 New Starts Funds and FTA Section 5307 Funds from the Federal government and the revenues from the County General Excise Tax (GET) Surcharge levied from 2007 through 2022. As a note regarding cost overruns, the capital cost estimate includes over $1 billion in 2009 dollars in contingencies to account for such events. Section 6.4 of the Final EIS describes the funding sources for ongoing operations and maintenance anticipated for the Project. Operating and maintenance costs will utilize the same funding sources currently used for TheBus—Federal funding, fare revenues, and subsidies from the City's General and Highway Funds.

34. As stated in Responses 32 and 33 above, Sections 6.3 and 6.4 of the Final EIS describe anticipated funding sources for capital costs and for operating and maintenance costs, respectively.

35. The analysis of the HOT facility in Honolulu from the Alternatives Analysis Report *shows the cost for the HOT lanes alternative to be $2.6 billion in 2006 dollars (the figure would be higher today because of inflation, however, as the Managed Lane Alternative was examined during the Alternatives Analysis phase conducted in 2006, costs in 2006 dollars are used when discussing the managed lane). As stated in the Transit Task Force Report, a committee was charged with reviewing cost estimates for the two Alternatives involving construction (Managed Lane Alternative and Fixed Guideway Alternative). The report states that "the Task Force agrees with this committee that the Alternatives Analysis' construction cost estimates were fairly and consistently prepared, and that they may be used for both planning and cost comparisons." Information was obtained by the Transit Task Force from HDOT and others familiar with HOT facilities. It is the only estimate to date that addresses Honolulu conditions.*

There is no substantiation of the estimate from the Tampa Bay toll facility being applicable in Honolulu. Regarding the comparison of the Tampa Bay facility, the Transit Task Force report states that "the committee concluded that the projects are sufficiently different (actual costs versus projected costs with contingencies; available, accessible [rights-of-way] vs. construction in actively used highways; no utilities relocation vs. extensive relocations) as to make the comparison unreasonable."

36. HOT Lanes are not eligible for FTA New Starts funding.

37. The Alternatives Analysis Report shows that the estimated cost of HOT Lanes is $2.6 billion (2006 dollars), which would be higher now. As stated in response to Comment 35 (above), this cost has been reviewed by HDOT and others.

38. Comment is missing from your letter.

39. This comment is not related to the environmental analysis of the Project. Rail has reduced traffic congestion within the corridor within which it is built (see Salt Lake City, Dallas, etc.). The travel forecasting model used in the environmental analysis of the Project uses guidelines established by FTA and, according to modeling done for the Project, the fixed guideway system will relieve traffic congestion compared to the No Build Alternative. Table 3-14 in the Final EIS shows an 18-percent reduction in VHD in 2030 with the Project as compared to the No Build Alternative.

40. As discussed above, a Managed Lane Alternative was studied in the Alternatives Analysis phase. This alternative was rejected for the reasons discussed above. Traffic conditions will be worse in 2030 under any circumstances and regardless of whether the fixed guideway, managed lane, or more buses are implemented. With the fixed guideway system, total islandwide congestion (as measured by VHD) would decrease by 18 percent as compared to the No Build Alternative (Table 3-14 in the Final EIS). In addition, traffic volumes were studied at various screenlines in the study corridor. The travel demand forecasting model was used to forecast traffic volumes at these screenlines in 2030, both with and without the Project. Analysis revealed that traffic volumes at these screenlines would decrease up to 11 percent with the Project during the a.m. peak hour (Table 3-9 in the Final EIS). Accordingly, traffic conditions will be substantially better with the fixed guideway than compared to the No Build Alternative. By contrast, in the Alternatives Analysis, the Managed Lane alternative showed a 1 percent reduction in VHD.

41. The fixed guideway project will provide an alternative to the private automobile.

42. As discussed above, the Managed Lane Alternative was fully evaluated in the Alternatives Analysis phase and demonstrated to be less effective than a Fixed Guideway Alternative for reasons previously stated in this letter.

43. As noted above, a Managed Lane Alternative meeting this general description was fully evaluated in the Alternatives Analysis phase and demonstrated to be less effective than a Fixed Guideway Alternative. The HOT facility was not only less effective in meeting the Project's Purpose and Need, but it was also financially unrealistic because it does not qualify for the GET Surcharge funds or Federal New Starts funding. Tolls would also have to be high to pay for the cost of the elevated lanes at $6.60 during the peak period. Tolls would still only generate less than a quarter of the capital funding needed to build the system. This toll rate is comparable to similar systems where tolls are as high as $10.00 during peak times (e.g., Orange County, CA—SR 91 HOT lanes).

Section 2

1-3. These comments are not related to the environmental analysis of the Project. These options may have application in the right time and the right place in conjunction with the

fixed guideway project. The Project does not preclude these activities from occurring; however, they are not within the control of the City.

4-5. This comment is not related to the environmental analysis of the Project. As noted above, regarding school hours, this option may have application in the right time and the right place in conjunction with the fixed guideway project. The Project does not preclude these activities from occurring; however, they not within the control of the City.

6. The State of Hawaii's Highway Modernization Plan, dated January 22, 2009, includes the $600 million Nimitz Viaduct project. It would complement the transit project and is included in the modeling conducted for both the No Build and Project Alternatives. As presented in the Highway Modernization Plan, the Nimitz Viaduct project does not include reversible lanes.

7. This comment is not related to the environmental analysis of the Project. The Project does not preclude improving response times for accidents.

8. This comment is not related to the environmental analysis of the Project. This option may have application in the right time and the right place in addition to the fixed guideway project. The Project does not preclude it from happening. This alternative is not within the control of the City.

9. This comment is not related to the environmental analysis of the Project. However, the Project does not preclude pay-as-you-go insurance from happening.

10. This comment is not related to the environmental analysis of the Project. The Project does not preclude this from happening.

11. This comment is not related to the environmental analysis of the Project. The City has a program to modernize the traffic signal system. It is in addition to and independent of the Project.

12-15. These comments are not related to the environmental analysis of the Project. These options may have application in the right time and the right place in addition to the fixed guideway project. The Project does not preclude it from occurring.

16. This comment is not related to the environmental analysis of the Project. This option may have application in the right time and the right place in addition to the fixed guideway project. The Project does not preclude this from happening. As mentioned in Section 4.19.2 of the Final EIS, TOD is expected to occur in project station areas as an indirect effect of the Project. In March 2009, the City Council approved and the Mayor of Honolulu signed Bill 10 (Ordinance 09-4), which defines the City's approach to TOD around fixed guideway stations. Zoning regulations, which will be developed in 2010, will address parking standards, new density provisions, open spaces, and affordable housing. While the Project is coordinating with City and State agencies to encourage development of enhanced pedestrian and bicycle facilities and other land use changes near the stations, the actual construction of such facilities and zoning changes are outside the scope of the Project. For reference, the Ewa Development Plan provides a thorough overview of the concept for future development in the Ewa Plain.

17-30. These comments are not related to the environmental analysis of the Project. However, the Project does not preclude these activities from happening.

Section 3

1. A variety of bus-related alternatives were examined during the Alternatives Analysis phase. BRT was also studied in the Primary Corridor Study in 2002. The alternatives in these analyses covered a variety of options, including increasing frequency of operations on an elevated bus facility. The Alternatives Analysis revealed that the fixed guideway system was more effective at reducing congestion on the existing roadways (11 percent reduction in VHD in AA) than an enhanced bus transit system (2 percent reduction in VHD).

2. The information on the South Nevada Metropolitan Area Express (MAX) system has been noted. The Alternatives Analysis showed that transit reliability would not have been improved except for express bus service operation while in the managed lanes. While this alternative would have slightly reduced congestion on parallel highways, system-wide traffic congestion (1 percent reduction in VHD) would have been similar to the No Build Alternative as a result of increased traffic on arterials trying to access the facility. Total islandwide VHD would have increased with the Managed Lane Alternative as compared to the No Build Alternative, indicating an increase in systemwide congestion as shown in Table 2-2 in the Final EIS.

3. The information on the Los Angeles Metro Rapid system has been noted. The Metro Rapid system relies primarily on non-exclusive right-of-way on existing roadways. As discussed in Section 3.4.2 of the Final EIS, there are no available options in Honolulu for improved bus service on existing roadways that are not already subject to high levels of congestion during peak travel times, which hinder reliability and level of service. The development of an exclusive right-of-way option for buses, such as the Orange Line in LA, was evaluated as part of the Managed Lane Alternative in the Alternatives Analysis phase (please see the response provided under the "General Comments" section in this response letter).

4. The information on the Los Angeles Orange Line system has been noted. Please see the previous response (Section 3, Response 3).

5. Information about TOD development has been noted. As stated in Section 4.19.2 of the Final EIS, TOD development could occur near station areas as an indirect effect of the Project. In March 2009, the City Council approved and the Mayor of Honolulu signed Bill 10 (Ordinance 09-4), which defines the City's approach to TOD around fixed guideway stations. Future zoning regulations will address parking standards, new density provisions, open spaces, and affordable housing. Financial incentives could include public-private partnerships, real property tax credits, and infrastructure financing. While the Project team is coordinating with City and State agencies to encourage development of enhanced pedestrian and bicycle facilities and other land use changes near the stations, the actual construction of such facilities and zoning changes are beyond the scope of the Project. The TOD effort will encourage public input into the design of TOD neighborhood plans to reflect unique community identities. TOD planning would occur before the fixed guideway stations are constructed.

6. Information about the NJ Transit Village Initiative and Boston's TOD policies on parking, transportation mitigation, and security has been noted. A Maintenance of Traffic (MOT)

and a Transit Mitigation Plan (TMP) will identify measures to mitigate temporary construction-related effects on transportation. Additionally, the MOT Plan will address effects on streets and highways, transit, businesses and residences, pedestrians and bicyclists, and parking as mentioned in Section 3.5.7 of the Final EIS. A Safety and Security Management Plan will be developed in accordance with FTA requirements to mitigate potential effects on community services as mentioned in Section 4.5.2 of the Final EIS. In general, zoning changes are determined by the local government (e.g., Ordinance 09-4).

7. This comment is not related to the environmental analysis of the Project.

8. Information regarding Ottawa and Pittsburgh BRT TOD has been noted. This comment is not related to the environmental analysis of the Project.

9. This comment is not related to the environmental analysis of the Project. Information on the success of TOD developments worldwide has been noted. For more information about TOD as it relates to the Project, see Section 3, Response 5 (above).

10. This comment is not related to the environmental analysis of the Project. The information on the relationship between connecting TOD to transit has been noted.

Section 4

1. This comment is not related to the environmental analysis of the Project. The information on Mark Muirello and the New York Exclusive Bus Lane (XBL) has been noted.

2-7. These comments are not related to the environmental analysis of the Project. The information on New York Port Authority bridges and tunnels has been noted.

8. This comment is not related to the environmental analysis of the Project. The information on operational changes of the NY XBL has been noted.

9-10. These comments are not related to the environmental analysis of the Project. The information on planning activities, including their alternatives, and partnerships for the New York area has been noted.

11. This comment is not related to the environmental analysis of the Project. The information on the pricing pilot program has been noted.

12. This comment is not related to the environmental analysis of the Project. The information on the Lincoln Tunnel HOT lane study has been noted.

13. This comment is not related to the environmental analysis of the Project. The information on the study of the NY Commercial vehicle priority has been noted.

14-18. These comments are not related to the environmental analysis of the Project. The information on the evolution of the Houston contraflow and HOV lanes has been noted.

19-20. These comments are not related to the environmental analysis of the Project. Information on Houston's HOV system connection to the Metro Rail system, parking capacity, and trips has been noted.

21-27. This comment is not related to the environmental analysis of the Project. Information on studies pertaining to BRT in Maryland has been noted. Please note the Red Line Project in Maryland is a Light Rail Transit project, not a BRT project.

28. This comment is not related to the environmental analysis of the Project. Information on the Corridor Cities Transitway in Maryland has been noted.

29. This comment is not related to the environmental analysis of the Project. Information on the Bi-County Transitway project has been noted.

30. This comment is not related to the environmental analysis of the Project. Information on the issues with BRT projects has been noted.

31. This comment is not related to the environmental analysis of the Project. Information on Robert Poole and virtual exclusive busways via Managed Lanes and pricing has been noted.

32. This comment is not related to the environmental analysis of the Project. Information on value pricing has been noted.

33-36. These comments are not related to the environmental analysis of the Project. Information about the history of HOV lanes, including carpool and vanpool information, has been noted.

37. This comment is not related to the environmental analysis of the Project. Information about the sustainability of BRT in HOV lanes has been noted.

38. Information about the I-15 HOT lanes and the 91 Express lanes has been noted. The concept of HOT was considered as part of the Alternatives Analysis phase but did not perform as well as the fixed guideway in terms of travel time or delay as noted in Chapter 2 of the Final EIS. The Alternatives Analysis does not dismiss the validity of HOT lanes in the appropriate application; however, they did not perform as well as the fixed guideway for this project.

39-40. See the previous response (Section 4, Response 38). Information about virtual exclusive busway (VEB) concepts, capacity, pricing, cost, and individual opinion to be recognized by the FTA as a viable alternative has been noted.

41. See the previous response (Section 4, Response 38). Information about VEB in Houston has been noted.

42. See the previous responses (Section 4, Response 38). Information about VEB concepts, capacity, pricing, cost, and individual opinion to be recognized by the FTA as a viable alternative has been noted.

43. See the previous responses (Section 4, Response 38). Information about VEB concepts and their cost has been noted.

44. It is agreed that managed lanes are being considered in a number of locations in the U.S. and that policy changes could make them acceptable to more applications through various forms of funding. As stated earlier, the validity of managed lanes is not questioned as an effective transportation alternative, but it does not perform as well as the fixed guideway in Honolulu based on the Alternatives Analysis Report *findings and the information contained in Chapter 2 of the Final EIS. It is worth noting that a VEB would not be eligible for the local GET Surcharge funds available to the fixed guideway.*

45. This comment is not related to the environmental analysis of the Project.

Section 5

1. Project goals include supporting planned development. In addition to the number of trips served, which is related to the population density, planning also considers the length of trips served. For instance, there is a better opportunity for travel time savings on longer the trips, which increases the potential benefit received from improvements to the system. Potential Transit Markets are discussed in Section 1.6 of the Final EIS, which provides a summary of population projections, locations of employment growth, current and future transit dependent households, and resident and tourist transit markets.

2. As indicated in Section 3.4.2 of the Final EIS, overall access to public transit would be enhanced with the Project. More than 25 percent of the population lives within one half mile of a fixed guideway station. Substantial Project ridership will be provided by local bus and people walking to the station. Bus and walk access to stations will account for "approximately 90 percent of total trips in the a.m. peak period" (Final EIS, Section 3.4.2, Access to Fixed Guideway Stations). Access to stations will be enhanced by accommodating bicyclists and pedestrians. Several stations will be located near existing or planned bicycle facilities. In addition, bus access will be enhanced to coordinate with the fixed guideway system. Lastly, park-and-ride facilities will be provided at stations with the highest demand for drive-to-transit access.

3. These comments are not related to the environmental analysis of the Project.

4. Ordinance 09-4 to establish a TOD program for the City and County of Honolulu provides for the development of the close knit communities mentioned in the comment. The Project further enhances accessibility within and among those communities.

5. With the Project, as stated in Chapter 3 of the Final EIS, the rate of transfers will be higher than under the No Build Alternative due to proposed changes in local bus service to maximize access to the fixed guideway system. However, because of the high frequency of the fixed guideway service (e.g., three-minute headways between trains during peak periods), riders transferring from buses to the fixed guideway will experience minimal wait times. Riders transferring from the guideway service to buses will benefit from improved frequencies on existing bus routes serving stations. Also, several new routes with high frequencies will be provided as feeders to the guideway system. Since these routes will primarily operate in

residential areas, they will provide greater reliability versus routes operating along congested arterials. Using these systems in the proposed complementary fashion, ridership forecasts are 116,000 trips daily on the Project as noted in Chapters 2 and 3 of the Final EIS. This is higher than any of the options evaluated in the Alternatives Analysis phase or in the Draft EIS.

6. Chapter 3 of the Final EIS states that adding substantial passenger capacity with more buses is not feasible in some locations along the system because of roadway capacity constraints. Choke points occur in Downtown Honolulu during the a.m. peak period, (weekday morning one-hour period of highest traffic; aka morning rush hour) especially at the merger of North Beretania, North King, and Liliha Streets and Dillingham Boulevard and along Hotel Street. King Street has been used to introduce new service in recent years due to the capacity limitation of Hotel Street; however, choke points occur at the Chinatown bus stops and at the Punchbowl Street and King Street stops. Buses often must wait to move into an open and safe boarding position. Continuing to add additional service to King Street without physical improvements would add to the gridlock in this corridor, deteriorate transit service, and complicate pedestrian and traffic safety issues. Choke points occur along Beretania Street, Hotel Street, Nimitz Highway, and Ala Moana Boulevard in the Downtown area.

Several routes, including CountryExpress! Routes C, D, and E, are projected to be overloaded in 2030. Increasing frequency would require headways of five minutes or less. Further, the Downtown street network cannot support the number of buses that would be required to meet projected demand. These system capacity limitations are a major obstacle to an effective addition of bus service in the corridor. The Alternatives Analysis Report *showed that an enhancement to the bus system would provide minimal benefit because it is subject to the same congestion impediments that already exist on the highway system.*

7-8. These comments are not related to the environmental analysis of the Project. The improvements you have proposed could be part of a comprehensive program of transportation improvements. They offer additional benefit, but do not replace the need for the fixed guideway.

9. This comment is not related to the environmental analysis of the Project. The Project provides the opportunity for the development of TOD and the support of the City's land use plans to grow in a manageable way, which is expected as an indirect effect of the Project. As stated in Chapter 1 of the Final EIS, the purpose and need for the project includes: improved corridor mobility, improved corridor reliability, improved access to planned development and improved transportation equity.

10-12. These comments are not related to the environmental analysis of the Project. Please see previous responses regarding buses, HOT lanes, and TOD.

13. As noted in Chapter 2 of the Final EIS, many other alternative approaches were evaluated in the Alternatives Analysis phase and rejected because they do not offer the capacity and other benefits of the elevated rail system proposed for the City of Honolulu.

Section 6

1. The island's unique visual character and scenic beauty were considered in the visual and aesthetic analysis presented in Section 4.8 of the Final EIS. The Project will be set in an

urban context where visual change is expected and differences in scales of structures are typical. The following measures will be included with the Project to minimize negative visual effects and enhance the visual and aesthetic opportunities that it creates:

- *Develop and apply design guidelines that will establish a consistent design framework for the Project with consideration of local context.*
- *Coordinate the project design with City's TOD program within the Department of Planning and Permitting.*
- *Consult with the communities surrounding each station for input on station design elements.*
- *Consider specific sites for landscaping and trees during the final design phase when plans for new plantings will be prepared by a landscape architect. Landscape and streetscape improvements will serve to mitigate potential visual impacts.*

It should also be noted that the Project will provide users, including tourists, with expansive views from several portions of the corridor by elevating riders above highway traffic, street trees, and low structures adjacent to the alignment. In Section 4.8.3 of the Final EIS under the heading Design Principals and Mitigation, specific environmental, architecture and landscape design criteria are listed (e.g., textured guideway or columns, tall plantings where it can screen features of the project, control of lighting to prevent intrusion into neighborhoods, etc., that will help minimize visual effects of the Project.

2. The highways will carry more vehicles in 2030 under any circumstances and regardless of which solution is applied. 2005 traffic volume data for the H-1 Freeway reports 10,140 vehicles per hour (vph) at the Kalauao screenline in the Koko Head-bound direction during the a.m. peak hour. This number is predicted to increase to 13,160 vph under 2030 No Build conditions; however, this number is lower with the fixed guideway (12,190 vph). The Alternatives Analysis Report *showed that reduction in daily vehicles trips was higher for the fixed guideway (48,000) than for the managed lanes (14,900). Accordingly, traffic conditions will be better with the fixed guideway than any of the other potential solutions studied, including managed lanes and additional bus service.*

3. Screened alternatives included a No Build Alternative, a Transportation System Management Alternative (TSM) (enhanced bus service), and a number of Build Alternatives. The comparison of alternatives presented in the Alternatives Analysis Report *concluded that the TSM Alternative would provide little benefit at a relatively low cost. A brief description of the TSM Alternative is provided in Section 2.1.2 of the Draft EIS. The comment makes the assumption that because they are not bound by a guideway, buses will travel from origin to destination. That is typically not the case as most long trips require a transfer to connect the two ends of a trip. The fixed guideway offers similar connections, but at a higher level of service.*

4. Based on the detailed operations modeling completed for the Project, which uses a speed of travel between stations consistent with what the design of the guideway can safely

support and which includes the time of acceleration and deceleration, the train will travel from one end of the line to the other in 42 minutes, including stops at all stations. That is about 30 mph on average and can be delivered regardless of the time of day or the conditions on the highways. As shown in Section 2.2.2 of the Final EIS, transit reliability would not have been improved in any of the other options evaluated in the Alternatives Analysis phase or the Draft EIS except for express bus service operation in the managed lanes during the time the bus is actually within the lanes. While this alternative would have slightly reduced congestion on parallel highways, systemwide traffic congestion would have been similar to the No Build Alternative as a result of increased traffic on arterials trying to access the facility. The TSM Alternative would have generated fewer hours of transit-user benefits than either the Managed Lane or Fixed Guideway Alternative. Since most buses would still operate in mixed traffic, the TSM Alternative would have done little to improve corridor mobility and travel reliability. The Alternatives Analysis further showed that the annualized cost per rider compared to the TSM Alternative was $102.74 for the managed lane option and $22.75 for the fixed guideway.

5. With the Project, as stated in Chapter 3 of the Final EIS, the rate of transfers will be higher than under the No Build Alternative due to proposed changes in local bus service to maximize access to the fixed guideway system. However, because of the high frequency of the fixed guideway service (three-minute headways between trains during peak periods), riders transferring from buses to the fixed guideway will experience minimal wait times. Riders transferring from the guideway service to buses will benefit from improved frequencies on existing bus routes serving stations. Also, several new routes with high frequencies will be provided as feeders to the guideway system. Since these routes will primarily operate in residential areas, they will provide greater reliability versus routes operating along congested arterials. The travel demand forecasting model includes a time penalty for transfers. With these characteristics in place, the transit system with the Project would still have ridership levels 44 percent higher than the No Build Alternative (i.e., continuation of present practices regarding bus service).

6. The highways will carry more vehicles in 2030 under any circumstances and regardless of which solution is applied, though the fixed guideway will offset those numbers. Traffic volume data for the H-1 Freeway reports 10,960 vph at the Kalauao screenline in the Koko Head-bound direction during the a.m. peak hour. This number is predicted to increase to 18,049 vph under 2030 No Build conditions; however, this number is lower with the fixed guideway (17,209 vph). Accordingly, traffic conditions will be better with the fixed guideway than any of the other potential solutions studied, including managed lanes (18,419 vph) and additional bus service (17,897 vph). In addition, the Alternatives Analysis did not show an improvement in traffic congestion on the H-1 Freeway with the Managed Lane Alternative compared to the No Build Alternative as evidenced in the previously mentioned reductions in vehicle hours of delay which drop by 18 percent for the fixed guideway compared to 1 percent for the Managed Lane Alternative.

7. This analysis was included in the evaluation of the Managed Lane Alternative in the Alternatives Analysis. It accommodated toll-free travel for buses and HOVs and a toll for single-occupant vehicles. However, this alternative was not selected. The proposed fixed guideway system will not share space with other vehicles due to safety concerns.

The amount of service provided on the fixed guideway will be scaled to match the demand. If the service attracts fewer riders than expected, then less service may be provided, by adjusting headways or train length, thereby resulting in lower operating and maintenance costs than currently projected. There is no plan to offer free ridership on the fixed guideway system.

8. As discussed previously in Section 3, Comment 1, adding substantial passenger capacity with more buses is not feasible in various locations along the system because of roadway capacity constraints, as shown in Section 3.4.2 of the Final EIS.

9. Overall system reliability, considering all factors, for a fully grade-separated transit system is substantially greater than for any system operating in mixed-flow conditions. In Honolulu, there is no practical difference between the proposed rail system and TheBus regarding labor considerations. The same is true for the Project or any other system, such as the Managed Lane Alternative. The comment regarding non-bid, single source-source contract is inaccurate. The City adheres to strict procurement rules that encourage bidding by as many firms as possible.

10. There is no indication that damage to a fixed guideway would be more difficult to repair than an elevated roadway. The chance of a transit vehicle being stopped by a disabled vehicle is greater in any form of mixed traffic flow, such as managed lanes, than in an exclusive right-of-way carrying only routinely maintained rail vehicles.

11. Section 6.3 of the Final EIS describes the anticipated financial resources needed to pay for the capital cost of the Project, including finance charges. Capital costs are expected to be fully paid for by a combination of FTA Section 5309 New Starts and FTA Section 5307 Funds from the Federal government and revenues from the County General Excise Tax Surcharge levied from 2007 through 2022 on Oahu. The Managed Lane Alternative cost estimate was $2.6 billion in 2006 dollars. It provides less benefit per dollar spent than the Project (the annualized additional cost per rider is $103 for managed lane and $22.75 for fixed guideway compared to TSM) as indicated in the Alternative Analysis and in Chapter 2 of the Final EIS.

As stated in Section 4.11.3 of the Final EIS, as a result of a reduction in Vehicle Miles Traveled (VMT), the , total transportation energy demand for transit and highway vehicles will be 3 percent lower with the Project when compared to the No Build Alternative. This decrease in energy demand is due to the reduction in VMT that occurs as a result of people switching from automobiles to the fixed guideway system and includes electrical energy required to operate the fixed guideway system. (The energy demand compares the use of energy from gasoline or electricity in common terms.) The Project will consume approximately 1 to 2 percent of the total projected electricity generated on Oahu in 2030. According to the Hawaiian Electric Company (HECO), the planned electricity generation capacity on Oahu will be sufficient to support the transit system, but the electricity distribution system will require various upgrades to support the system. HECO is moving toward renewable energy generation. As that happens, the fixed guideway will also benefit from such new sources of energy. Construction of the Project will use more energy than the No Build Alternative as indicated in Section 4.18.6 of the Final EIS. This will be true of any similar construction effort. The combination of daily use reductions and amount of construction energy needed could, over the short term, result in the expenditure of more energy than the No Build.

12. This comment is not related to the environmental analysis of the Project. Information about the quality of buses has been noted. As shown in Figure 3-7 of the Final EIS, transit travel with the Project will be substantially faster than transit travel under No Build conditions. This travel time includes transfers. As stated in Section 3.4.2, operation of the fixed guideway in exclusive right-of-way will improve convenience. For riders who stand, the guideway service will also provide increased safety (e.g., ease of acceleration/deceleration, low floor access, etc.).

13. The EIS does not address tolling because the Project does not include any tolled facilities. Tolls were considered during the Alternatives Analysis phase for the Managed Lane Alternative. Tolls of $6.60 during the peak period were used and able to fund only 25 percent of the capital cost of the elevated lane project. In other places, such as Orange County, California, the SR-91 tolls rise to $10 during the peak times of the week. Similar costs are forecast for the HOT lanes on the Dulles Expressway. Such high tolls were anticipated to be prohibitive for Honolulu users and would have impaired the project's ability to meet Purpose and Need regarding equitable transportation.

14. Implementation of the Managed Lane Alternative would have resulted in increased automobile use on Oahu relative to all other alternatives evaluated in the Alternatives Analysis phase (for more information, see Table 6-3 of the Alternatives Analysis).

15. Project goals include supporting planned development. The objective of this goal is to avoid the dispersal of development which will lead to more sprawl in parts of the island unable to support it. In addition to the number of trips served, which is related to the population density, planning of the system considers the length of trips served. A fixed guideway system has the advantage of providing a permanent mode of transportation that provides assurance to developers the investment will be there for the long term, which is necessary to support planned development. This allows for longer term planning without the concern that the system can change easily over time, which could be the case with a bus network. The Project will help shape future development. Jobs and housing are more likely to locate closer to each other with the Project based on the experience in all other rail projects over the past 20 years (e.g., Portland, OR, Seattle, WA, Houston, TX, etc).

The Project has developed plans to prevent safety and security problems at stations and will provide police staffing at stations to support those plans. The stations are also being designed according to the precepts of Crime Prevention Through Environmental Design (CPTED) which ensures that spaces are visible, open, well-lit and observable to minimize crime. Ridership forecasts, on the other hand, are made without the benefit of speculation about what type of land uses might locate near transit stations. The FTA only allows approved development or imminent plans to be considered in planning the system.

16. The Final EIS does not consider HOT lanes, as those were eliminated during the Alternatives Analysis process, as discussed in Chapter 2 of the Final EIS. Costs for the Managed Lanes Alternative in the Alternatives Analysis were developed using the same principles, procedures and unit costs used for the fixed guideway alternative (as described in Chapter 5 of the Alternatives Analysis). The costs were furthered reviewed and agreed to by HDOT.

17. The Managed Lane Alternative was fully evaluated in the Alternatives Analysis phase and demonstrated to be less effective than a Fixed Guideway Alternative. The engineering cost estimate for a two-lane reversible managed lane facility, which was calculated following the same rigorous cost estimating process used for the Fixed Guideway Alternatives, was $2.6 billion in 2006 dollars. The zipper lane was eliminated in evaluation of the reversible facility because with the additional lanes, the demand and capacity would be better balanced without the zipper lane. Implementation of the zipper lane results in the loss of two lanes of capacity in the reverse direction. By 2030, the directional transportation demand will be more balanced than it is today. Eliminating the zipper lane, while evaluating the reversible Managed Lane Alternative, provided the greatest benefit to modeled freeway users by increasing capacity in both directions. Access ramps were provided at several locations. Park-and-ride facilities and bus stops were included to maximize transit use, providing the alternative the greatest opportunity to generate transit user benefits.

The City Council's Transit Advisory Task Force, which reviewed the Alternatives Analysis, concluded in their report of December 14, 2006, that the assessment of each alternative was "fair and accurate" and that capital cost estimates were compiled using the same methodology and unit cost and that the construction cost estimates were fairly and consistently prepared.

The Managed Lane Alternative was evaluated in the Alternatives Analysis and demonstrated to be less effective than a Fixed Guideway Alternative. The findings are summarized in Chapter 2 of the Final EIS as follows:

The Managed Lane Alternative was evaluated for its ability to meet project goals and objectives related to mobility and accessibility, supporting planned growth and economic development, constructability and cost, community and environmental quality, and planning consistency. VMT would have increased compared to any of the other alternatives. While this alternative would have reduced congestion on parallel highways, system-wide traffic congestion would have been similar to the No Build Alternative as a result of increased traffic on arterials trying to access the facility. Total islandwide VHD would have increased with the Two-lane Reversible Option as compared to the No Build Alternative, indicating an increase in system-wide congestion. Transit reliability would not have been improved except for express bus service operating in the managed lanes. The Managed Lane Alternative would not have supported planned concentrated future population and employment growth because it would not provide concentrations of transit service that would serve as a nucleus for TOD. The Managed Lane Alternative would have provided little transit benefit at a high cost. The cost-per-hour of transit-user benefits for the Managed Lane Alternative would have been two to three times higher than that for the Fixed Guideway Alternative. Similar to the TSM Alternative, the Managed Lane Alternative would not have substantially improved service or access to transit for transit-dependent communities.

All meetings and materials supporting meetings were prepared according to the practices required by NEPA and the FTA. The objective of meetings was to obtain input on the Project and shape the project to be compatible with the community's needs. The information contained in the Final EIS was added or modified as a result of responses from the meetings and comments shared by the general public.

Section 7

1. Adding buses and elevated HOT Lanes were evaluated in the Alternatives Analysis phase and eliminated because they did not perform as well as the fixed guideway, as described in Chapter 2 of the Final EIS. In addition, riders will be able to access the fixed guideway system by all the modes listed in this comment.

2. Adding substantial passenger capacity with more buses, even larger buses, is not feasible in some locations along the system because of roadway capacity constraints as shown in Section 3.4.2 of the Final EIS. Even with the fixed guideway, buses will continue to carry the largest portion of transit users (about 78 percent). The difference is TheBus will be operated in support of the fixed guideway and that intermodal linkage provides a more efficient trip. Bicycles will be accommodated on the rail vehicles. A policy is in development regarding bicycle accommodation on rail vehicles. The primary focus will be on ensuring that bicycles can be safely carried on vehicles. This may require consideration of passenger loads during heavy travel periods on the trains to make sure riders are not displaced by bicycles.

3. As mentioned in Chapter 2 of the Final EIS, transit reliability would not have been improved except for express bus service operation in the managed lanes. While the Managed Lanes Alternative would have slightly reduced congestion on parallel highways, system-wide traffic congestion would have been similar to the No Build Alternative as a result of increased traffic on arterials trying to access the facility. Transit travel times for the Project compared to Existing Conditions and the No Build Alternative are shown in Figure 3-7, and travel speeds in Table 3-15 of the Final EIS. In all cases, the transit performance is improved with the Project.

4. As shown in Chapter 2 of the Final EIS, even using a managed lane for part of the trip, most buses still operate primarily in mixed traffic. That results in little improvement in corridor mobility and travel reliability even though the portion in the special lanes improves. Buses can travel at reasonable speeds in the special lanes but still may need to negotiate congested access points which obviate much of the benefit of the concept. This prevents the buses from achieving the travel time identified in the comment.

5. As noted in Chapter 2 of the Final EIS, adding buses and HOT lanes were studied in the Alternatives Analysis phase and eliminated because those options did not perform as well as the fixed guideway, which is the subject of the Final EIS.

6. With the Project, as stated previously (see Section 5, Response 5), the rate of transfers will be higher than under the No Build Alternative due to proposed changes in local bus service to maximize access to the fixed guideway system. However, because of the high frequency of the fixed guideway service (three-minute headways between trains during peak periods), riders transferring from buses to the fixed guideway will experience minimal wait times. Riders transferring from the guideway service to buses will benefit from improved frequencies on existing bus routes serving stations. Also, several new routes with high frequencies will be provided as feeders to the guideway system. Since these routes will primarily operate in residential areas, they will provide greater reliability versus routes operating along congested arterials.

The travel demand forecasting model includes a time penalty for transfers. With these characteristics in place, the transit system with the Project will still have ridership levels 44 percent higher than the No Build Alternative due to the fixed guideway, feeder bus routes, and TheBus routes. In addition, as stated in Section 1.2 of the Final EIS, 63 percent of Oahu population and 80 percent of employment are located within the study corridor. By 2030, these distributions will increase to 69 percent and 83 percent, respectively. Lastly, the fixed guideway system provides park-and-ride lots at the stations with the highest projected drive-to-transit demand. While people typically try to minimize transfers on any trip, the more fundamental criterion for making a trip decision is how long the trip takes. Rail will offer people a shorter overall trip time compared to other options even with the transfers, as noted in Section 3.4.2 of the Final EIS.

7. As stated in response to a previous comment (Section 5, Response 5), those transferring to the rail from TheBus will experience minimal wait times. Riders transferring from the guideway service to buses will benefit from improved frequencies on bus routes serving stations where the shorter routing of many bus lines in the vicinity of stations will allow for shorter headways. As stated in Chapter 3 of the Final EIS, all stations will be equipped with escalators and elevators. Stations will also have covered waiting areas.

8. As stated in Response 33-36 under Section 4, the Alternatives Analysis Report *showed the cost of the Managed Lane Alternative to be $2.6 billion (vetted by HDOT and other experts familiar with Hawaii's building conditions and requirements), compared to the fixed guideway at $3.5 billion, and had little benefit to users compared to the fixed guideway. The Tampa Bay experience is not typical and could not be duplicated in Honolulu. There are many differences between the two locations that need to be considered (e.g., the Tampa Bay project required almost no rights-of-way to be acquired; the Tampa Bay project did not need to relocate major utilities along the corridor; the Tampa Bay project did not need to span major facilities such as freeway; and finally, construction costs in Tampa Bay are substantially lower than in Honolulu).*

9. This comment is not related to the environmental analysis of the Project. Information about other cities building HOT lanes and population numbers has been noted. Recognizing each city is unique, no other single city has been used as a model for Honolulu in developing the characteristics of the rail system.

10. The Alternatives Analysis phase evaluated an expanded bus system (TSM Alternative) and showed it did not perform in a satisfactory manner compared to the fixed guideway. This is discussed in Chapter 2 of the Final EIS. Ridership for the TSM Alternative increases to 7 percent over the No Build Alternative compared to 38 percent for the Project over the No Build. As stated previously, the amount of service provided will be scaled to generally match the demand.

11. This comment is not related to the environmental analysis of the Project. Prior BRT planning programs, such as addressed in the Primary Corridor Project, are not part of the current Project or EIS.

12. As stated previously, the Project will consume 1 to 2 percent of the total projected electricity generated on Oahu in 2030. The Final EIS indicates that the Project will reduce

energy consumption by about 2,000 MBTUs over the No Build. This represents about 15,000 gallons of fuel saved per day. Alternative energy sources, such as photo-voltaic cells, can be built into the rail system as the development of alternative energy sources continues. The Project will still rely on HECO for energy, but the planned electricity generation capacity on Oahu will be sufficient to support the transit system.

13. As presented in the Alternatives Analysis Report *and summarized in Chapter 2 of the Final EIS, the cost for a two-lane reversible managed lane facility is $2.6 billion in 2006 dollars. The fixed guideway alternatives were calculated following the same cost estimating process. Toll revenue would pay for less than 25 percent of the cost, based on a $6.60 toll. The construction of numerous off-ramps and parking facilities would require acquisition of property and displacement of current businesses and residents, all of which are included in cost estimates, when applicable.*

14. The Project consists of the construction and implementation of rail transit service (analyzed in the Final EIS). As mentioned in Section 4.19.2 of the Final EIS, TOD is anticipated in project station areas as an indirect effect of the Project. The increased mobility and accessibility that the Project may provide will also increase the desirability and value of land near the stations, thereby attracting new real estate investment (in the form of TOD). Planning and zoning around station areas is the responsibility of the City's Department of Planning and Permitting in compliance with the City's TOD Ordinance 09-4.

15. The Project provides a variety of ways to access the fixed guideway and does not account for the possibility of TOD in the forecasts of ridership. If riders live nearby, they can walk or bike, and if they live further away, they can drive and park or take the bus. Bicycle/pedestrian facilities, as well as park-and-ride facilities are included in the Project. Chapter 3 of the Final EIS details ridership characteristics and system usage on a station-by-station basis, which shows ridership is not impeded by the planned station locations.

Section 8

1. The Managed Lane Alternative was evaluated in the Alternatives Analysis phase and demonstrated to be less effective than a Fixed Guideway Alternative. The findings are summarized in Chapter 2 of the Final EIS.

2. Regarding "main myths," in the case of the Honolulu system, rail performs better overall in the measures listed, including construction costs, if the bus system requires that a new guideway be built. The Alternatives Analysis phase compared an expansion of the bus system against the fixed guideway. Unlike the Project, while the bus expansion is less costly, it provides no measurable benefit compared to the No Build Alternative. As discussed in Chapter 2 of the Final EIS, the Managed Lane Alternative would have generated the greatest amount of air pollution, required the greatest amount of energy for transportation use, and resulted in the largest number of transportation noise impacts of all the alternatives evaluated.

3. Regarding speed, most buses still operate in mixed traffic, resulting in less improvement in corridor mobility and travel reliability than the fixed guideway system. As shown in the Alternatives Analysis Report *and Section 2.2.2 of the Final EIS, transit reliability would not have been improved except for express bus service operation in the managed lanes. According*

to the Alternatives Analysis Report, *while a Managed Lane Alternative would have reduced congestion on parallel highways, leading to a 4 percent reduction in vehicle hours of delay for the two-direction managed lane option over all, system-wide traffic congestion would have been similar to the No Build Alternative as a result of increased traffic on arterials trying to access the facility. As shown in Chapter 3 of the Final EIS, travel time by rail from East Kapolei to Ala Moana Center will take 42 minutes with the Project, regardless of the time of day or conditions on surrounding roadways. As shown in Figure 3-7, transit travel time during the a.m. peak period from Kapolei to Downtown will take approximately 55 minutes door to door compared to approximately 90 minutes on the freeway.*

4. Chapters 2 and 3 of the Final EIS state that the system will have a minimum capacity exceeding 17,300 passengers per direction during the two-hour peak period. If demand warrants, the system can expand to a four-car train and run at 90-second intervals, increasing capacity by over 100 percent. Also, like a bus system, during the off-peak periods, the service level is reduced to use equipment and other resources efficiently.

5. Regarding "Myth 3", overall system reliability for a fully grade-separated transit system is greater than for any system operating in mixed-flow conditions (meaning all vehicles can operate on the facility as opposed to restrictions based on numbers of riders, separate bus lanes or other restrictive limits on usage.) Breakdowns do not affect the operation of the system beyond removal of the defective equipment. The system is designed to allow trains to continue functioning even if there is an obstruction in the line by providing cross-over tracks at strategic locations throughout the corridor. Though transit strikes in Honolulu have been infrequent, labor unions can be expected to be part of the operation of the system, so there is the possibility of a work stoppage under some circumstances. That does not obviate the benefit of the Project. Though strikes can be disruptive, the Project would provide service well over 99 percent of the time based on the past ten years of transit labor history on Oahu. There has been one one-month long strike during that period (August 2003).

6. Regarding "Myth 4", according to the FTA's Safety Management Information Statistics for 1997, the most recent data available in the Transportation Research Board (TRB) Report, Improving Transit Security, there was one serious offense for every one million passenger miles carried on rail. There is a need for security on transit systems, just as there is a need for police and other security with other transportation modes (e.g., airports and ports), but there is no evidence that crime rates associated with transit are any higher than for society in general. Crime rates on transit systems are correlated closely with crime rates in the neighborhoods within which the stations are located (e.g., "Crime in public transit systems: An environmental design perspective", Adele Pearlstein and Martin Wachs).

The costs of security are included in the operating costs for the Project. DTS, with assistance from the Honolulu Police Department, is developing a security plan for transit facilities, including park-and-ride lots. Security, including cameras, will be provided at all stations and park-and-ride facilities.

7. Regarding "Myth 5", information about the cost of the Managed Lane Alternative versus the Fixed Guideway is shown in the Alternatives Analysis Report. *The Project is more expensive than the Managed Lane Alternative but provides benefits in terms of reliability, mobility, access to planned development, and transportation system equity compared to the No*

Build Alternative. The Project is subject to the same bidding process that would be applied to the construction of an elevated managed lane facility.

8. Regarding "Myth 6", the Managed Lane Alternative was evaluated in the Alternatives Analysis phase and eliminated because it did not perform as effectively as the Fixed Guideway Alternative, as noted in Chapter 2 of the Final EIS. Details in the comment regarding other locations are inconsistent with the findings of a comprehensive analysis completed in the Alternatives Analysis for Honolulu. As stated in Response 35 under Section 1, the Tampa Bay example is unique and not duplicable for the same costs in Honolulu due to items such as those mentioned in Section 7, Response 8 The estimate for construction of the Managed Lane in Honolulu was reviewed by HDOT and others during the Alternatives Analysis process and found to be consistent with cost experience in Hawaii.

9. Regarding "Myth 7", while it may be true that auto pollution is less when cars are traveling on uncongested roadways, this comment is not related to the project alternatives or effects.

10. As shown in the Alternatives Analysis Report, *both the TSM and Managed Lane Alternatives showed small increases in transit ridership compared to the No Build Alternative while the Fixed Guideway Alternative showed substantial increases in ridership. The Project will provide feeder bus service to surrounding communities.*

11. Regarding "Myth 8", as shown in Table 3-7 in the Transportation Technical Report, ridership on TheBus (including TheHandi-Van) has been increasing. The increase in resident daily transit trips from 166,400 in 2007 to 255,500 (Table 3-13 of the Final EIS) in 2030 with the Project represents a 53.5-percent increase for this 23-year period. This represents a compound annual growth rate of less than 2 percent. This is a reasonable expectation with the addition of a grade-separated fixed guideway line to the transportation system. Increases of this magnitude are not uncommon in other U.S. transit systems (e.g., Portland, OR with 40 percent growth between 1990 and 1997).

12. Regarding "Myth 9", as stated above, the Final EIS indicates that the Project will reduce energy consumption over the No Build. Table 4-21 of the Final EIS shows that operation of the Project will reduce energy consumption for transportation by 3 percent compared to the No Build Alternative. The construction of the Project is anticipated to consume approximately 7.5 million MBTUs. Construction projects of similar magnitude would be expected to use a similar amount of energy.

13. Regarding "Myth 10", according to information provided by HECO, transportation (e.g., cars , trucks and buses) accounts for 63 percent of Hawaii's imported oil while electrical generation consumes 30 percent of the imported oil. Currently, 11 percent of the electricity on Oahu is generated by renewable resources. HECO is currently soliciting proposals for 100 MW of renewable-energy generating capacity to be in service between 2010 and 2014.

The transit system will allow for a decrease in automobile use, thereby reducing the amount of oil required for transportation while only using about 1 to 2 percent of the electrical generating capacity through HECO and other independent power producers in 2030. The Project does not require the construction of a new power plant. Emergency generators will be

provided at stations, but they are a safety and security requirement for stations. They do not draw additional electrical energy unless in use.

14. Regarding "Myth 11", this comment is not related to the environmental analysis of the Project. Information regarding the Vancouver Skytrain is noted. However, similar to Vancouver's Skytrain, the Honolulu fixed guideway system will be integrated with the buses, including a single fare system.

15. Regarding "Myth 12", this comment is not related to the environmental analysis of the Project. Information regarding the Vancouver transportation system is noted.

16. Regarding "Myth 13", this comment is not related to the environmental analysis of the Project. Information regarding Buenos Aires, Atlantic City, Hong Kong, and Asia is noted. All systems in the U.S. require subsidies as currently configured. Until general practices change in this country, the same will apply to Honolulu. The information about annual subsidies is presented in Section 6.4.2 of Chapter 6 of the Final EIS

17. Regarding "Myth 14", this comment is not related to the environmental analysis of the Project. Information regarding transit ridership trends in Pittsburgh is noted.

18-19. These comments are not related to the environmental analysis of the Project. Information regarding transit ridership trends in Pittsburgh is noted.

20-21. Regarding "Myth 16", the American Public Transportation Association's 2008 Public Transportation Fact Book states: "Since 1995, public transportation ridership in the U.S. grew by more than 32 percent, faster than highway travel or the U.S. population." Data from the American Public Transportation Association is based on information reported by transit agencies regarding various aspects of transit ridership. Census data is based on more general information and does not adequately reflect transit trends; the Census data cited in the comment letter is regarding people using transit to commute only.

22-23. Regarding "Myth 17", the ridership forecast for the fixed guideway project is over 116,000 boardings a day in 2030 (Table 3-18 of the Final EIS). As stated in Section 3.4.2 of the Final EIS, of the 116,000 boardings a day, approximately 40,000 are riders who, in the absence of the fixed guideway, would have had use a car on the freeways and highways of the island. Travel forecasting models and methodologies are developed in consultation with FTA. The forecasts in the Final EIS have been reviewed and approved by the FTA.

24. Regarding "Myth 18", this comment is not related to the environmental analysis of the Project.

25. This comment is not related to the environmental analysis of the Project. The Project is expected to carry approximately 26 percent of all transit riders on a daily basis (116,300 out of a total of 453,400).

26. Regarding "Myth 19", this statement does not appear in the Draft or Final EISs.

27. Table 7-2 of the Final EIS shows that a transit trip from Waianae to UH Manoa will take 121 minutes (two hours) with one transfer in 2030 without the Project (No Build Alternative), and 93 minutes (with two transfers) for the Project.

28. Regarding "Myth 20", it is not clear what the source of your comment is, but the intent appears to be a concern about an increase in transfers. There will be an increase in transfers with the fixed guideway, but even with the transfers, overall travel times will be substantially shorter as noted in Figure 3-7 of the Final EIS, and noted in Section 8, Response 27.

29. This comment is not related to the environmental analysis of the Project. The Primary Corridor Transportation Project (1998-2002) evaluated at-grade BRT busways in the corridor showing substantially lower ridership and overall performance than the Fixed Guideway. For the Managed Lane Alternative, placing the bus stops at grade and requiring buses to exit the facility at each location would have added significant time to a trip as well as a substantial cost for interchanges. The concept for bus service in the Managed Lane Alternative was a line-haul service (fast service with few stops and very short boarding and alighting times) that relied on well-coordinated transfers at critical stations, much like a rail system.

30. Regarding "Myth 21", the evaluated Managed Lane Alternative from the Alternatives Analysis phase includes ramps at several locations, including Aloha Stadium and Middle Street. Any increase in the number of access points to the facility will result in additional right-of-way requirements and additional costs beyond the estimate of $2.6 billion in 2006 dollars.

31. As described in Chapter 2 of the Final EIS, the City has selected steel wheels operating on steel rail transit. There will be an uninterruptible power supply (UPS) at each station, with capability to energize critical systems, such as lighting and communications, for a few hours in the case of a temporary power outage. There will also be a UPS backup for the Operations Control Center (OCC) and a backup diesel generator for long-term backup of the OCC. There will also be a special connection at each station to allow for a portable generator to be used in case of a longer-term outage affecting a single station. The FTA requires that a project begin Preliminary Engineering before the Final EIS is completed. Information from Preliminary Engineering is required to assess all significant impacts that would result from project implementation.

32. In order to identify potential impacts and alternatives for the NEPA process, some level of engineering is necessary. This helps planners and FTA to identify items such as the footprint for stations and the alignment, affects on historic properties, archaeological resources, and wetlands, and noise and vibration impacts. However, this level of engineering is limited to approximately only 10 percent of the total level of engineering that would be required for a project to enter construction. The reason that more engineering is not completed until after the environmental process is to not preclude the consideration of other alternatives.

33. Chapter 6 of the Final EIS describes the needed financial resources anticipated to pay for the capital cost of the Project and for ongoing operating and maintenance costs. Capital costs of the Project, including finance charges, are expected to be fully paid for by a combination of FTA Sections 5307 and 5309 New Starts Funds from the Federal government and the GET surcharge revenues collected from 2007 through 2022 on Oahu. Operating and

maintenance costs will be paid for using the same sources currently used for TheBus—Federal funding, fare revenues, and City revenues from the General and Highway Funds.

34. As described above, the Managed Lane Alternative was evaluated in the Alternatives Analysis Phase and demonstrated to be less effective than a Fixed Guideway Alternative.

Section 9

1-11 and a. With the Project, as stated in Chapter 3 of the Final EIS, the rate of transfers would be higher than under the No Build Alternative due to proposed changes in local bus service to maximize access to the fixed guideway system. However, because of the high frequency of the fixed guideway service (three-minute headways between trains during peak periods), riders transferring from buses to the fixed guideway will experience minimal wait times. Riders transferring from the guideway service to buses will benefit from improved frequencies on existing bus routes serving stations. Also, several new routes with high frequencies will be provided as feeders to the guideway system. Since these routes will primarily operate in residential areas, they will provide greater reliability versus routes operating along congested arterials. The travel demand forecasting model includes a time penalty for transfers. Ridership forecasts increase 44 percent over the No Build Alternative despite a higher rate of transfers. While people typically try to minimize transfers on any trip, the more fundamental criterion for making a trip decision is how long the trip takes. Rail will offer people a shorter overall trip time compared to other options even with the transfers, as noted in Section 3.4.2 of the Final EIS.

12. As stated in Section 3.4.2 of the Final EIS, for those leaving stations in the a.m. two-hour peak period (usually around 7 a.m. to 9 a.m.), most people walk, particularly at stations with large employment concentrations. Table 3-20 of the Final EIS shows the mode of access information for each fixed guideway station.

13. The fixed guideway system will directly serve the Airport. As shown in Table 2-7 of the Final EIS, trains will serve stations every 3 minutes during peak periods and up to every 10 minutes during off-peak periods.

14. As stated in the Alternatives Analysis Report *and Section 2.2.2 of the Final EIS, enhanced bus service was examined during the Alternatives Analysis and rejected because this alternative would not have improved roadway congestion.*

15. Tourist use of rail with luggage is estimated to be very low. Other tourist use, such as shopping or visiting sites of interest, would represent about 7 percent of total usage. As stated in Chapter 3 of the Final EIS, approximately 9,900 visitors will use the fixed guideway daily of which 1,800 are to or from the airport.

Section 10

1. This comment is not related to the environmental analysis of the Project.

2. The Managed Lane Alternative was evaluated in the Alternatives Analysis phase and demonstrated to be less effective than a Fixed Guideway Alternative for reasons previously

explained. Reduced traffic congestion as a result of the fixed guideway compared to the No Build Alternative will result in improved operations for roadway users.

3. Rail transit will be provided by DTS or their selected operator. As stated previously, though transit strikes in Honolulu have been infrequent, labor unions can be expected to be part of the operation of the system, so there is the possibility of a work stoppage. However, that does not obviate the benefit of the Project.

4. An increase in the bus fleet was addressed in the Alternatives Analysis Phase under the TSM Alternative, as noted in Chapter 2 of the Final EIS. It did not improve conditions because of existing congestion on the highway system and was eliminated from further consideration in favor of the fixed guideway that is the subject of the Final EIS.

5. Such express bus service fails to serve any intermediate points. Additionally, if any portion of the bus trip is within mixed traffic flow, travel time reliability is less than an exclusive right-of-way fixed guideway system.

6. There is no indication that damage to a fixed guideway would be any more difficult to repair than to an elevated roadway/busway.

7. For a high-volume transit system, operating costs are higher per passenger for bus compared to rail service. The greatest cost of transit is the labor cost, which is higher for buses than rail. Rail systems are less expensive to operate than bus systems on a per-passenger-mile basis according to the Transportation Energy Data Book of the Department of Energy.

Section 11

Description

1. The HOT lanes were addressed in the Alternatives Analysis Phase (described as the Managed Lane Alternative) and rejected as providing less benefit as compared to the fixed guideway. The summary of that finding is presented in Chapter 2 of the Final EIS, and is addressed in General Comments of this letter.

2. The Project is a 20-mile fixed-guideway system that extends from East Kapolei to Ala Moana Center and includes points in-between.

Cost

3. The Final EIS analyzes the fixed guideway project. The HOT lanes were addressed in the Alternatives Analysis (described as the Managed Lane Alternative) and rejected because it provided less benefit compared to the fixed guideway. The summary of that finding is presented in Chapter 2 of the Final EIS. The $1 billion construction cost figure is not consistent with the results of the Alternatives Analysis. The Alternatives Analysis estimated the cost of the managed lane in Honolulu at $2.6 billion. This cost was verified by HDOT and others familiar with Hawaii and HOT projects. The HOT facility could qualify for some Federal funding from highway sources, but it is not eligible for the funds available to the fixed guideway project.

4. The capital plan for the Project is presented in Section 6.3 of the Final EIS, including a description of the amount of funding anticipated from various sources. Section 6.6 of the Final EIS describes risks and uncertainties associated with these funding assumptions. While Federal funds are not guaranteed until Congress acts to allocate them, the completion of the environmental process and approval of a Record of Decision indicates that a project may be eligible for Federal funding, if it meets the specific requirements as identified in the Safe, Accountable, Flexible, Efficient Transportation Equity Act, a Legacy for Users (SAFETEA-LU). FTA has given no indication that they will not fund the Project at the levels requested.

Traffic

5. While managed lanes would have reduced congestion on parallel highways, system-wide traffic congestion would have been similar to the No Build Alternative as a result of increased traffic on arterials trying to access the facility. Total islandwide VHD would have increased with the Managed Lane Alternative as compared to the No Build Alternative, indicating an increase in system-wide congestion as shown in Chapter 2 of the Final EIS.

6. Conditions on the highways will be worse in 2030 under any circumstances, regardless of which solution is applied. Vehicle Hours of Delay is expected to increase from 71,800 in 2009 to 104,700 in 2030 under the No Build Alternative. With the fixed guideway system, total islandwide congestion (as measured by VHD) would decrease by 18 percent to 85,800, compared to the No Build Alternative (Figure 3-14 in the Final EIS). In addition, traffic volumes were studied at various screenlines in the study corridor. The travel demand forecasting model was used to forecast traffic volumes at these screenlines in 2030, both with and without the Project. Analysis revealed that traffic volumes at these screenlines will decrease up to 11 percent with the Project during the a.m. peak hour (Tables 3-9 and 3-10 of the Final EIS). These tables show an improvement in conditions on the H-1 Freeway with the Project compared to No Build conditions.

Energy Savings

7. As stated in the Alternatives Analysis Report *and Chapter 2 of the Final EIS, energy consumption would have been the highest with the Managed Lane Alternative. The higher energy use is due to the additional vehicle trips that would occur with this Alternative.*

8. As stated before, the Final EIS indicates that the Project will reduce energy consumption by about 2,000 MBTUs over the No Build. The result is also noted in Section 4.11 of the Final EIS. This represents about 15,000 gallons of fuel saved per day. Alternative energy sources, such as photo-voltaic cells, can be built into the rail system at stations and facilities. As the development of alternative energy sources evolves on the island, HECO will generate more electric power from renewable sources, which will contribute to a greener use of energy by the Project.

Environment

9. The Managed Lane Alternative was fully evaluated in the Alternatives Analysis and demonstrated to be less effective than a Fixed Guideway Alternative. All alternatives, including the No Build Alternative, include trade-offs between benefits and impacts. As stated in

Chapter 2 of the Final EIS, the Managed Lane Alternative would have generated the greatest amount of air pollution, required the greatest amount of energy for transportation use, and would have resulted in the largest number of transportation noise impacts of all the alternatives evaluated.

10. To paraphrase from Section 4.6.3 of the Final EIS: The transit facility is not expected to be a visual or physical barrier in most neighborhoods; the Project will not substantially change development patterns, although it may change the character of development along the alignment. The Project will provide a reliable and efficient travel mode for accessing the region's current and future jobs, shopping, and social resources, particularly those in Kapolei and Downtown. This increase in mobility for neighborhood residents will generally improve the quality of life, especially those with limited financial resources and those who may be transit dependent.

The Project is a little over 20 miles long, and noise levels are lower than for a bus 50 feet away from a sensitive noise receptor (see Section 4.10 of the Final EIS). In most of the corridor, noise levels as a result of the Project are lower than existing ambient levels. There is also recognition of the visual effect of the Project in the Final EIS. The island's unique visual character and scenic beauty was considered in the visual and aesthetic analysis presented in the Final EIS. The Project will be set in an urban context where visual change is expected and differences in scales of structures are typical. The measures included with the Project to minimize negative visual effects and enhance the visual and aesthetic opportunities that it creates can be found in Section 4.8.3 of the Final EIS under the heading Design Principles and Mitigation. Specific environmental, architecture and landscape design criteria are listed and include various treatments of the guideway and columns, landscaping, etc.

Ridership and Capacity

11. The TSM Alternative had a larger number of daily transit trips (243,100) than the No Build Alternative (232,100) and less than the Fixed Guideway Alternative (281,900), as shown in Table 2-2 of the Final EIS.

12. Figure 3-11 of the Final EIS shows that the fixed guideway will increase the transit mode share for home-based work trips during the a.m. two-hour peak period (approximately, 6 a.m. to 8 a.m.). As shown in Figure 3-11, for many travel markets, the transit share of trips under the Project will double or triple the share occurring under the No Build Alternative. For example, the commute-to-work transit share of the Kapolei to Downtown Honolulu travel market would increase from 23 percent under the No Build Alternative to 60 percent under the Project. In other words, more than half of the people going from Kapolei to Downtown to work in the morning would use transit with the Project, compared to only a quarter without the Project.

Convenience

13. HOT lanes were evaluated during the Alternatives Analysis phase as part of the Managed Lane Alternative and rejected because they did not reduce congestion as compared to other alternatives considered. As noted earlier in Section 5, Response 5, there will be more transfers with the fixed guideway, but overall travel times will be shorter because of frequency of service.

14. With the Project, as stated in Chapter 3 of the Final EIS, the rate of transfers will be higher than under the No Build Alternative due to proposed changes in local bus service to maximize access to the fixed guideway system. However, because of the high frequency of the fixed guideway service (three-minute headways between trains during peak periods), riders transferring from buses to the fixed guideway will experience minimal wait times. Riders transferring from the guideway service to buses will benefit from improved frequencies on existing bus routes serving stations. Also, several new routes with high frequencies will be provided as feeders to the guideway system. Since these routes will primarily operate in residential areas, they will provide greater reliability versus routes operating along congested arterials. The travel demand forecasting model includes a time penalty for transfers. Ridership forecasts show an increase of 44 percent over the No Build Alternative despite a higher rate of transfers. While people typically try to minimize transfers on any trip, the more fundamental criterion for making a trip decision is how long the trip takes. Rail will offer people a shorter overall trip time compared to other options even with the transfers as noted in Section 3.4.2 of the Final EIS.

Land Development

15. The Project will include enhanced bus service integrated with the fixed guideway system. Alternatives that relied only on bus transit were evaluated during the Alternatives Analysis and were shown to be less effective than the Fixed Guideway Alternative. Chapter 2 of the Final EIS summarizes those findings.

16. Population growth is expected regardless of the Project. However, because of the Project, more development and growth is expected around station locations. From Section 4.19.2 of the Final EIS, the increased mobility and accessibility that the Project may provide would also increase the desirability and value of land near the stations, thereby attracting new real estate investment nearby. Therefore, the Project's primary indirect effect would be higher densities than presently planned or could otherwise be developed near transit stations. These land use effects could take the form of TOD or transit-supportive development (TSD). In March 2009, the City Council approved and the Mayor of Honolulu signed Bill 10 (2008) (Ordinance 09-4), which defines the City's approach to TOD around fixed guideway stations. Zoning regulations will address parking standards, new density provisions, open spaces, and affordable housing. Financial incentives could include public-private partnerships, real property tax credits, and infrastructure financing. While the Project is being coordinated with City and State agencies to encourage development of enhanced pedestrian and bicycle facilities and other land use changes near the stations, the actual construction of such facilities and zoning changes are beyond the scope of the Project. The special districts also encourage public input into the design of TOD neighborhood plans to reflect unique community identities.

Taxes

17. The $1 billion construction cost figure is not consistent with the results of the Alternatives Analysis. The Alternatives Analysis estimated the cost of the managed lane in Honolulu at $2.6 billion. This cost was verified by HDOT and others familiar with Hawaii and HOT projects during the Transit Task Force review. The HOT facility could qualify for some Federal funding from highway sources, but it is not eligible for the funds available to the fixed guideway project.

18. Section 6.3 of the Final EIS describes the financial resources (i.e., Federal funds and General Excise Tax Surcharge) anticipated to pay for the capital cost of the Project, including finance charges. Ordinance 07-001 prohibits using real property tax revenues to pay for capital costs.

Section 12

The engineering cost estimate for a two-lane reversible managed lane facility, which was calculated following the same cost estimating process used for the Fixed Guideway Alternatives, was $2.6 billion in 2006 dollars. The City Council's Transit Advisory Task Force reviewed the Alternatives Analysis and concluded in their report of December 14, 2006, that the assessment of each alternative was "fair and accurate" and that capital cost estimates were compiled using the same methodology and unit cost and that the construction cost estimates were fairly and consistently prepared. The Task Force also concluded that the Honolulu project is not comparable to the referenced Tampa tollway. As a point of reference, the State of Hawaii's Highway Modernization Plan, dated January 22, 2009, estimates the cost of the Nimitz Viaduct at $600 million for a less-than 2.5-mile elevated highway.

The zipper lane was eliminated in evaluation of the reversible facility because with the additional lanes, the demand and capacity would be better balanced without the zipper lane. Implementation of the zipper lane results in the loss of two lanes of capacity in the reverse direction. By 2030, the directional transportation demand will be more balanced than it is today. Eliminating the zipper lane when evaluating the reversible Managed Lane Alternative provided the greatest benefit to modeled freeway users by increasing capacity in both directions. Stations were provided at important transfer points to maximize the benefit to transit users with destinations other than on the elevated lanes.

As described above, access ramps were provided at several locations, including Aloha Stadium and Middle Street.

Bus stations were included to provide convenient transit access to neighborhoods through which the facility would pass. Adding additional ramps to serve ground level bus stations would have dramatically increased the cost and impacts of the facility and would have reduced performance of both the facility and surrounding streets.

Section 13

As shown in Table 6-1 of the Final EIS, the estimated cost for the Project is $4.6 billion in 2009 dollars or and $5.5 billion in inflated dollars. The other system costs are noted. Because the costs included in your comment are not adjusted for inflation (they include costs that are more than 20 years old), a direct comparison cannot be made to the other projects mentioned in your comment.

Section 14

1. A travel forecasting model was used to forecast traffic volumes during the a.m. and p.m. peak hours in 2030, both with and without the fixed guideway system. Six screenlines (virtual lines across the corridor used to measure total travel at that point) were identified to

compare changes in traffic conditions in the corridor at the six locations. As seen in Tables 3-9 and 3-10 of the Final EIS, traffic volumes in 2030 will be better with the Project compared to the No Build Alternative. For instance, with the fixed guideway system, there is an 11 percent reduction in traffic at the Kalauao screenline in the Koko Head-bound direction during the a.m. peak hour and a 10-percent reduction in the Ewa-bound direction during the p.m. peak hour when compared to conditions without the fixed guideway.

2. In "Chapter 2—Alternatives Considered" of the Alternative Analysis report, November 2006 and summarized in the Final EIS—two options were considered for the Managed Lane Alternative: a Two-direction Option and a Two-lane Reversible Option. Both Managed Lane Alternatives "would have provided a two-lane elevated toll facility between Waipahu and Downtown Honolulu, with variable pricing strategies for single or low occupant vehicles to maintain free-flow speeds for transit and high-occupancy vehicles (HOVs)." The Two-direction Option would have served express buses operating in both directions during the entire day. To maintain free-flow speeds in the Two-direction Option, it may be necessary to charge tolls to manage the number of HOVs using the facility. For the Two-lane Reversible Option, three-person HOVs would be allowed to use the facility for free, while single-occupant and two-person HOVs would have to pay a toll. The Two-lane Reversible Option was found to be the most optimal of the Managed Lanes Alternative options, but it was shown not to be the best alternative when compared to the fixed guideway.

3. As stated in Chapter 2 of the Final EIS, while this alternative would have reduced congestion on parallel highways, system-wide traffic congestion would have been similar to the No Build Alternative as a result of increased traffic on arterials trying to access the facility. Total islandwide VHD would have increased with the Managed Lane Alternative compared to the No Build Alternative, indicating an increase in system-wide congestion (Table 2-2 of the Final EIS).

4-6. As stated previously, energy use would be the highest with the Managed Lane Alternative. HECO is moving toward renewable energy generation. As that happens, the fixed guideway will also benefit from such new sources of energy. In addition, the Department of Energy publishes statistics for average transit rail energy consumption (2,784 BTUs per passenger mile), cars (3,512 BTUs per passenger mile), and transit buses (4,235 BTUs per passenger mile). Based upon these figures, transit trains are a more energy-efficient mode of transportation than passenger cars or transit buses. As the Department of Energy advises, great care should be taken when comparing modal energy intensity data among modes. Because of the inherent differences among the transportation modes in the nature of services, routes available, and other additional factors, it is not possible to obtain truly comparable national energy intensities among modes. These values are averages, and there is variability within modes.

7-9. As mentioned in Chapter 2 of the Final EIS, transit reliability would not have been improved except for express bus service operation in the managed lanes. While this alternative would have slightly reduced congestion on parallel highways, system-wide traffic congestion would have been similar to the No Build Alternative as a result of increased traffic on arterials trying to access the facility. Total islandwide VHD would have increased with the Managed Lane Alternative as compared to the No Build Alternative, indicating an increase in system-wide congestion (Table 2-2 of the Final EIS). Furthermore, the managed lanes alternative would not

have been significantly less costly than fixed guideway and would have been unable to encourage the type of compact growth desired in the corridor.

10. As mentioned in the Executive Summary and Chapter 2 of the Final EIS, the Managed Lane Alternative would have provided less of a transit benefit at a higher cost than the Fixed Guideway Alternative. The Fixed Guideway Alternative will be more cost effective in the long run. In the "Summary—Funding Options" section, funding sources for the capital investments associated with the fixed guideway include a State GET surcharge, City general obligation bonds, and FTA funds. Only the Fixed Guideway Alternative could be funded with the GET surcharge. As noted in Chapter 6 of the Final EIS, the GET is expected to generate $3.5 billion through 2022 and the FTA has agreed to consider at least $1.55 billion for the Federal contribution to the Project through the New Starts program for the Fixed Guideway. The Alternatives Analysis indicates that toll revenues from the Managed Lanes Alternative, if high enough, would pay for ongoing operations and maintenance while any remaining toll revenues, supplemented by other revenues, would be used to repay debt incurred to construct the system.

11. As shown in Chapter 2 of the Final EIS, November 2008, the Managed Lane Alternative would have provided little community benefit, as it would not have resulted in substantially improved transit access in the corridor. This alternative also would not have supported planned concentrated future population and employment growth because it would not provide concentrations of transit service that would serve as a nucleus for TOD.

12. The purpose of the Project, as established in Section 1.8 of the Final EIS, is to provide high-capacity rapid transit in the highly congested east-west transportation corridor between Kapolei and UH Manoa. In Section 1.9, goals include: improve corridor mobility, corridor travel reliability, access to planned development, and transportation equity.

13. Chapter 6 of the Final EIS describes the financial resources anticipated to pay for the capital cost of the Project and for ongoing operating and maintenance costs. Capital costs of the Project, including finance charges, are anticipated to be fully paid for by a combination of FTA Section 5309 New Starts and FTA Section 5307 Funds from the Federal government and revenues from the County General Excise Tax Surcharge levied from 2007 through 2022 on Oahu. Section 6.6 of the Final EIS describes risks and uncertainties associated with these funding assumptions. Chapters 3 and 4 of the Final EIS discuss the effects of the Project on the transportation system and natural and built environment.

14. Chapter 1 of the Final EIS indicates that 69 percent of the islandwide population and 83 percent of employment will be located within the corridor in 2030. Many are much closer than that. Ridership forecasts of over 116,000 trips a day indicate service will reach a broad base of the population and carry high percentages of trips during the peak travel times when it is most needed. For example, over 30 percent of work trips to Downtown Honolulu will use transit with the implementation of the Project. NEPA (40 C.F.R. Part 1506.6) requires public involvement as part of the environmental impact statement process. The public involvement program is designed, as required by NEPA, to engage the public in as many ways as practical. This program for the Project has been comprehensive in sharing information with as many people as possible. Other assertions about travel behavior in your comment are inconsistent with the findings in Chapter 3 of the Final EIS related to transit ridership.

15. The Project provides an alternative to the travel condition noted in your comment. The fixed guideway does not require driving into the sun in either direction. The Project would result in decreased congestion compared to the No Build Alternative, making travel more reliable for emergency vehicles than with the No Build Alternative.

16. Your preference for elevated lanes is noted.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
Creation Date :	12/8/2008
Creator Affiliation :	
First Name :	J
Last Name :	Such
Business/Organization :	
Address :	
Alternative Preference :	
Apt./Suite No. :	
City :	
State :	HI
Zip Code :	96707
Email :	maumutt@gmail.com
Telephone :	
Telephone Extension :	
Add to Mailing List :	None
Submission Method :	Website
Other Submission Method :	
Submission Date :	12/08/2008

Submission Content/Notes : The reason so few have input at this stage is because our voices will not be heard. This administration is arrogant and a bully and has demonstrated this from day one regarding the rail. Mufi's "my way or the highway" prevails and no amount of discussion will change that. That is why he did not get my vote or ever will for that matter. The rail cost is too expensive for the few taxpayers of this island. No one in their correct mind has ever started a rail system from its' farthest point out in the hopes it would someday reach the city. Absolutely amazing and ridiculous. The mayors' reply? "There are too many potential lawsuits in Waikiki" and so these will magically disappear by starting at the opposite end? Zero logic, zero sense. No connection to the airport? Again, what modern city did not connect their rail to the airport and/or train stations? Now this administration has gained full control over the bidding, so as in the beginning, all of the mayor's friends, family, and campaign contributors will get the contracts and we the taxpayers will foot the bill. It smells of corruption. This boondoggle will not be completed on time nor on budget nor do Hawaii's workers have the training, talent, or desire to build this with quality. It took DOT 12 months to identify one single buried cable near Pearl Harbor
that cost an additional $1 million dollars to the taxpayers. One cable, one year. By comparison, St. Paul MN rebuilt their massive multilane bridge over the Mississippi in 13 months.
Here, 12 months just to identify one cable. At that rate this rail should be done by the next century. Track record? Look at H-3... I believe that short stretch of highway took 37 years. Not exactly speedy construction histories for Hawaii. Electricity?
How is this administration going to keep the electric cables in the ground when according to DOT, they presently cannot figure out how to keep the wiring for the lighting for H1 in the ground. It is going on 3 years now and H1 is still dark. Is the rail going to sit for 3 years too without electric while DOT does nothing? And you wonder why no one bothers giving you folks input...what would be the point? What is needed is an in depth Federal investigation and oversight into this Administration, its' bidding processes, and the rail planning or lack of it. There is no other label for this project than boondoggle. Period.

DEPARTMENT OF TRANSPORTATION SERVICES

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DEPUTY DIRECTOR

June 11, 2010

RT9/09-331317

J. Such
maumutt@gmail.com

Dear J. Such:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall indentify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

As described in Section 2.5.10 of the Final EIS, to support phased opening of the system, the first construction phase must be connected to a maintenance and storage facility, which requires considerable land. The first phase of the Project must be connected to the maintenance and storage facility because, in addition to maintenance of equipment and ongoing operations, the maintenance and storage facility houses the main control center for the entire Project, and the required testing and operation of the system could not be completed without access to it. No location has been identified closer to Downtown with sufficient available land to construct a maintenance and storage facility. The Project will be constructed in phases to accomplish the following:

- *Match the anticipated schedule for right-of-way acquisition and utility relocations*
- *Reduce the time that each area will experience traffic and community disturbances*

- *Allow for multiple construction contracts with smaller contract size to promote more competitive bidding*
- *Match the rate of construction to what can be maintained with local workforce and resources*
- *Balance expenditure of funds to minimize borrowing*

The portion of the corridor Ewa of Pearl Highlands is less developed than the areas Koko Head. Right-of-way can be obtained more quickly; therefore, overall project construction can begin earlier, resulting in lower total construction costs. Construction is planned to continue uninterrupted Koko Head from Pearl Highlands to Aloha Stadium, then Kalihi, and finally to Ala Moana Center.

The Preferred Alternative includes a connection to the Airport. While each of the alternatives discussed in the Draft EIS includes trade-offs between benefits and impacts, the Airport Alternative from East Kapolei to Ala Moana has been selected as the Preferred Alternative as described above. As compared to the alternatives discussed in the Draft EIS, the Airport Alternative will carry the most passengers, provide the greatest transit-user benefits, and result in the fewest vehicle hours of delay. During the public comment period on the Draft EIS, the public overwhelmingly supported the Airport Alternative. Of the comments that specifically supported one of the alternatives, more than 75 percent were in support of the Airport Alternative. For more information this selection is discussed in Section 2.4 of the Final EIS.

Lastly, in answer to your concern about electric cables in the ground, the power coupling to the vehicles will be via a third rail located on the elevated guideway. The third rail will not be accessible to the public. The Federal Transit Administration is providing project management oversight, as indicated in Figure 2-1 of the Final EIS.

The FTA and DTS appreciate your interest in the Project. The Final EIS has been issued in conjunction with the distribution of this letter. You may view the Final EIS on the Project website at www.honolulutransit.org. You may request a DVD of the Final EIS and additional content through the "Contact Us" tab on the website or by calling the Project hotline at 566-2299. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Status :	Initial Action Needed
Creation Date :	11/24/2008
Creator Affiliation :	
First Name :	SL
Last Name :	SUEN
Business/Organization :	HING HANG TRADING GROUP LLC
Address :	1021 SMITH ST.
Alternative Preference :	
Apt./Suite No. :	210
City :	HON
State :	HI
Zip Code :	96817
Email :	S_SUENS@YAHOO.COM
Telephone :	5366422
Telephone Extension :	
Add to Mailing List :	Both
Submission Method :	Website
Other Submission Method :	
Submission Date :	11/24/2008
Submission Content/Notes :	PROVIDING MORE MAP DETAILS AND DESCRIPTIONS ON EACH ALTERNATIVE OF SALT LAKE ROUTE AND AIRPORT ROUTE FOR THIS PROPOSED RAIL TRANSIT SYSTEM ON THIS ISLAND COMMUNITY. HAVE THANKSGIVING.

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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HONOLULU, HAWAII 96813
Phone: (808) 768-8305 • Fax: (808) 768-4730 • Internet: www.honolulu.gov

MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-330792

S. L. Suen
1021 Smith Street
Apartment 210
Honolulu, Hawaii 96817

Dear S. L. Suen:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraph addresses your comments regarding the above-referenced submittal:

Regarding your request for map details and descriptions, in addition to the project maps included in Chapter 2 of the Draft and Final EISs, Appendix B of the Final EIS includes detailed plans for the Airport Alternative. Similar plans for the Salt Lake Alternative were included in Appendix A (Conceptual Plans) of the Draft EIS.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
Creation Date :	12/31/2008
Creator Affiliation :	
First Name :	Hurshae
Last Name :	Summons
Business/Organization :	military contractor
Address :	po box 1090
Alternative Preference :	
Apt./Suite No. :	
City :	Pearl City
State :	HI
Zip Code :	96782
Email :	Schaesan@hotmail.com
Telephone :	808-4283549
Telephone Extension :	
Add to Mailing List :	Both
Submission Method :	Website
Other Submission Method :	
Submission Date :	12/31/2008
Submission Content/Notes :	I thought about it for quite some time and considered input from friends, neighbors, and strangers. This project should have been started years ago. There remains a problem, the route is impractical, it should be changed before time and money are wasted. Thousands of commuters travel from areas like Waianae and Kahuku travel as far a Honolulu to work. The routes should at least start in these locations and end a practical transit area outside of Honolulu where a major "Bus" depot is. Another Idea is to connect Ewa Beach to Honolulu.(build a &%#$% bridge) If national security is an issue then at least ask the Government. All they can say is no.

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-332341

Hurshae Summons
P.O. Box 1090
Pearl City, Hawaii 96782

Dear Hurshae Summons:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

As outlined in Section 1.1 of the Final EIS, there have been several prior attempts to develop a rail transit system in Honolulu. While each of the alternatives discussed in the Draft EIS includes trade-offs between benefits and impacts, the Airport Alternative from East Kapolei to Ala Moana has been selected as the Preferred Alternative as described above. As compared to the alternatives discussed in the Draft EIS, the Airport Alternative will carry the most passengers, provide the greatest transit-user benefits, and result in the fewest vehicle hours of delay. It will provide access to employment centers at Pearl Harbor Naval Base and Honolulu International Airport and will serve the Salt Lake neighborhood with connecting bus service. Of the three Build Alternatives addressed in the Draft EIS, the Airport Alternative will have slightly less impacts to the natural and built environment analyzed in the Draft EIS. During the public comment period on the Draft EIS, the public overwhelmingly supported the Airport Alternative. Of the comments that specifically supported one of the alternatives, more than 75 percent were

in support of the Airport Alternative. For more information this selection is discussed in Section 2.4 of the Final EIS. Since publication of the Draft EIS, design has been advanced, further analysis has been completed, and information has been added in response to comments on the Draft EIS and agency coordination. The Final EIS discusses the process that was used to select the Preferred Alternative, how comments were considered in the decision-making process, impacts and mitigation commitments.

The areas listed in the comment will be served by local feeder bus service that will integrate with the fixed guideway system. Waianae and Kahuku will be served by local feeder bus service that will integrate with the fixed guideway system. Appendix D of the Final EIS presents information on future bus routes and frequencies.

As described in Chapter 2, a Pearl Harbor crossing was evaluated and eliminated by the Oahu Metropolitan Planning Organization (OahuMPO) as part of the regional planning process.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
Creation Date :	12/8/2008
Creator Affiliation :	
First Name :	karen
Last Name :	sunahara-teruya
Business/Organization :	
Address :	94-537 Holaniku St.
Alternative Preference :	
Apt./Suite No. :	
City :	Mililani
State :	HI
Zip Code :	96789
Email :	
Telephone :	808-341-9864
Telephone Extension :	
Add to Mailing List :	None
Submission Method :	Website
Other Submission Method :	
Submission Date :	12/08/2008
Submission Content/Notes :	I have been commuting from Mililani to town for the last 25 years. Although I am against the rail and voted accordingly, if the City does move forward, I believe that the first segment should NOT be from Kapolai to Waipahu. This is the most stupidest thinking I have seen yet. What were the transportation planners thinking!!! The route should be from the center core Honolulu outward. For there to be any significant impact in the early stages, it is to take traffic out of the Pearl City to honolulu segment. How the planners cannot think of this logical aspect is astounding! What will the Kapolei to Waipahu segment buy us, when everyone is trying to get into town? Do you expect the leeward folks to ride the rail from Kapolei to Waipahu and then catch the BUS into town? Come on, where is the logical thinking on this. Lets do whats right and not do the stupid thing just because it was planned that way. The City should think smarter with our tax dollars.

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-331316

Ms. Karen Sunahara-Teruya
94-537 Holaniku Street
Mililani, Hawaii 96789

Dear Ms. Sunahara-Teruya:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall indentify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

As described in Section 2.5.10, Project Phasing, and further in Section 8.6.9, Construction Phasing, in the Final EIS, to support phased opening, the first construction phase must be connected to a maintenance and storage facility, which requires considerable space. No location has been identified closer to Downtown with sufficient available space to construct a maintenance and storage facility. Therefore, construction will begin between East Kapolei and Leeward Community College. The Project will be constructed in phases to accomplish the following:

- *Match the anticipated schedule for right-of-way acquisition and utility relocations.*
- *Reduce the time that each area will experience traffic and community disturbances.*

- *Allow for multiple construction contracts with smaller contract size to promote more competitive bidding.*
- *Match the rate of construction to what can be maintained with local workforce and available financial resources.*
- *Balance expenditure of funds to minimize borrowing.*

The portion of the corridor in the Ewa direction of Pearl Highlands is less developed than the areas in the Koko Head direction. Right-of-way can be obtained more quickly at the west end of the Project; therefore, overall project construction can begin earlier, resulting in lower total construction costs. Construction is planned to continue uninterrupted in the Koko Head direction from Pearl Highlands to Aloha Stadium, Kalihi, and finally to Ala Moana Center.

As portions of the Project are completed, each will be opened incrementally so that system benefits, even if limited during the initial phases, will be realized prior to completion of construction of the entire Project.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
Creation Date :	12/6/2008
Creator Affiliation :	
First Name :	Ron
Last Name :	Suwa
Business/Organization :	
Address :	94-1050 Pulelo Street
Alternative Preference :	
Apt./Suite No. :	
City :	Waipahu
State :	HI
Zip Code :	96797
Email :	rmsuwa@gmail.com
Telephone :	
Telephone Extension :	
Add to Mailing List :	Both
Submission Method :	Website
Other Submission Method :	
Submission Date :	12/06/2008
Submission Content/Notes :	I think the first section of the rail should be between Pearl City and Honolulu. I also favor Pearl Harbor/Airport versus Salt Lake.

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-331294

Mr. Ron Suwa
94-1050 Pulelo Street
Waipahu, Hawaii 96797

Dear Mr. Suwa:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall indentify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraph addresses your comments regarding the above-referenced submittal:

As described in Section 2.5.10, Project Phasing, and further in Section 8.6.9, Construction Phasing, in the Final EIS, to support phased opening, the first construction phase must be connected to a maintenance and storage facility, which requires considerable space. No location has been identified closer to Downtown with sufficient available space to construct a maintenance and storage facility. Therefore, construction will begin between East Kapolei and Leeward Community College. The Project will be constructed in phases to accomplish the following:

- *Match the anticipated schedule for right-of-way acquisition and utility relocations.*
- *Reduce the time that each area will experience traffic and community disturbances.*

- *Allow for multiple construction contracts with smaller contract size to promote more competitive bidding.*
- *Match the rate of construction to what can be maintained with local workforce and available financial resources.*
- *Balance expenditure of funds to minimize borrowing.*

The portion of the corridor in the Ewa direction of Pearl Highlands is less developed than the areas in the Koko Head direction. Right-of-way can be obtained more quickly at the west end of the Project; therefore, overall project construction can begin earlier, resulting in lower total construction costs. Construction is planned to continue uninterrupted in the Koko Head direction from Pearl Highlands to Aloha Stadium, Kalihi, and finally to Ala Moana Center.

As portions of the Project are completed, each will be opened incrementally so that system benefits, even if limited during the initial phases, will be realized prior to completion of construction of the entire Project.

The Airport Alternative is the Preferred Alternative in the Final EIS. While each of the alternatives discussed in the Draft EIS includes trade-offs between benefits and impacts, the Airport Alternative from East Kapolei to Ala Moana has been selected as the Preferred Alternative as described above. As compared to the alternatives discussed in the Draft EIS, the Airport Alternative will carry the most passengers, provide the greatest transit-user benefits, and result in the fewest vehicle hours of delay. It will provide access to employment centers at Pearl Harbor Naval Base and Honolulu International Airport and will serve the Salt Lake neighborhood with connecting bus service. Of the three Build Alternatives addressed in the Draft EIS, the Airport Alternative will have slightly less impacts to the natural and built environment analyzed in the Draft EIS. During the public comment period on the Draft EIS, the public overwhelmingly supported the Airport Alternative. Of the comments that specifically supported one of the alternatives, more than 75 percent were in support of the Airport Alternative. For more information this selection is discussed in Section 2.4 of the Final EIS. Since publication of the Draft EIS, design has been advanced, further analysis has been completed, and information has been added in response to comments on the Draft EIS and agency coordination. The Final EIS discusses the process that was used to select the Preferred Alternative, how comments were considered in the decision-making process, impacts and mitigation commitments.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
Creation Date :	12/9/2008
Creator Affiliation :	
First Name :	Ted
Last Name :	Taheny
Business/Organization :	
Address :	85-1053 Piliuka way
Alternative Preference :	
Apt./Suite No. :	
City :	Waianae
State :	HI
Zip Code :	96792
Email :	ttaheny@khon.com
Telephone :	696-6924
Telephone Extension :	
Add to Mailing List :	Both
Submission Method :	Website
Other Submission Method :	
Submission Date :	12/09/2008
Submission Content/Notes :	I would like to ride my bicycle to the train, take it on the train into town, and ride it from the station to work... provided you make allowances for bicycles on the trains. Please include this in your plans. Thank You

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

RT9/09-331521

May 21, 2010

Mr. Ted Taheny
85-1053 Piliuka Way
Waianae, Hawaii 96792

Dear Mr. Taheny:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall indentify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraph addresses comments regarding the above-referenced submittal:

As stated in Chapter 3 of the Final EIS, each station will have facilities for parking bicycles. Bicycles will also be allowed on trains, as regulated by a bicycle policy. This policy will be determined at a later time prior to the opening of the fixed guideway system.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Issuance of the Record of Decision under NEPA and acceptance of the Final EIS by the Governor of the State of Hawaii are the next anticipated actions and will conclude the environmental review process for this Project.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
Creation Date :	11/24/2008
Creator Affiliation :	
First Name :	Paulette A.
Last Name :	Tam
Business/Organization :	concerned resident
Address :	P O Box 4787
Alternative Preference :	
Apt./Suite No. :	
City :	Kaneohe
State :	HI
Zip Code :	96744
Email :	ptam1861@yahoo.com
Telephone :	247-2725
Telephone Extension :	
Add to Mailing List :	Both
Submission Method :	Website
Other Submission Method :	
Submission Date :	11/24/2008
Submission Content/Notes :	Aloha, Even though I do not live on the leeward side of Oahu, I support the Draft EIS in its entirety and feel the steel on steel rail transit system should be built as soon as possible from Kapolei through the airport to Ala Moana Center. I can see myself catching the bus to Ala Moana Center and riding the rail transit to Kapolei and back in the event I get a job or move out to that area. Thank you for your time. Aloha, Paulette A. Tam concerned Kaneohe resident and former Kaneohe Neighborhood Member 1989-2006.

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-330791

Ms. Paulette A. Tam
P.O. Box 4787
Kaneohe, Hawaii 96744

Dear Ms. Tam:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraph addresses your comments regarding the above-referenced submittal:

Your preference for the Airport Alternative has been noted. While each of the alternatives discussed in the Draft EIS includes trade-offs between benefits and impacts, the Airport Alternative from East Kapolei to Ala Moana has been selected as the Preferred Alternative as described above. As compared to the alternatives discussed in the Draft EIS, the Airport Alternative will carry the most passengers, provide the greatest transit-user benefits, and result in the fewest vehicle hours of delay. It will provide access to employment centers at Pearl Harbor Naval Base and Honolulu International Airport and will serve the Salt Lake neighborhood with connecting bus service. Of the three Build Alternatives addressed in the Draft EIS, the Airport Alternative will have slightly less impacts to the natural and built environment analyzed in the Draft EIS. During the public comment period on the Draft EIS, the public overwhelmingly supported the Airport Alternative. Of the comments that specifically supported one of the alternatives, more than 75 percent were in support of the Airport Alternative. For more

information this selection is discussed in Section 2.4 of the Final EIS. Since publication of the Draft EIS, design has been advanced, further analysis has been completed, and information has been added in response to comments on the Draft EIS and agency coordination. The Final EIS discusses the process that was used to select the Preferred Alternative, how comments were considered in the decision-making process, impacts and mitigation commitments.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
Creation Date :	12/6/2008
Creator Affiliation :	
First Name :	Candice
Last Name :	Tan
Business/Organization :	
Address :	324 ILIMANO Street
Alternative Preference :	
Apt./Suite No. :	
City :	Kailua
State :	HI
Zip Code :	96734
Email :	cleetan@hawaii.rr.com
Telephone :	254-4097
Telephone Extension :	
Add to Mailing List :	Email
Submission Method :	Website
Other Submission Method :	
Submission Date :	12/06/2008
Submission Content/Notes :	Yes, let's do it.

There has been enough arguing and complaining.

Let's get this thing started! It's going to cost a lot of money, but we have a lot of people to share the cost.

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, 3RD FLOOR
HONOLULU, HAWAII 96813
Phone: (808) 768-8305 • Fax: (808) 768-4730 • Internet: www.honolulu.gov

MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-331300

Ms. Candice Tan
324 Ilimano Street
Kailua, Hawaii 96734

Dear Ms. Tan:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall indentify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraph addresses your comments regarding the above-referenced submittal:

Your preference for a Fixed Guideway Transit Alternative has been noted. While each of the alternatives discussed in the Draft EIS includes trade-offs between benefits and impacts, the Airport Alternative from East Kapolei to Ala Moana has been selected as the Preferred Alternative as described above. As compared to the alternatives discussed in the Draft EIS, the Airport Alternative will carry the most passengers, provide the greatest transit-user benefits, and result in the fewest vehicle hours of delay. It will provide access to employment centers at Pearl Harbor Naval Base and Honolulu International Airport and will serve the Salt Lake neighborhood with connecting bus service. Of the three Build Alternatives addressed in the Draft EIS, the Airport Alternative will have slightly less impacts to the natural and built environment analyzed in the Draft EIS. During the public comment period on the Draft EIS, the public overwhelmingly supported the Airport Alternative. Of the comments that specifically supported one of the alternatives, more than 75 percent were in support of the Airport Alternative. For more

information this selection is discussed in Section 2.4 of the Final EIS. Since publication of the Draft EIS, design has been advanced, further analysis has been completed, and information has been added in response to comments on the Draft EIS and agency coordination. The Final EIS discusses the process that was used to select the Preferred Alternative, how comments were considered in the decision-making process, impacts and mitigation commitments.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
Creation Date :	11/24/2008
Creator Affiliation :	
First Name :	Rock
Last Name :	Tang
Business/Organization :	
Address :	1448 Young Street
Alternative Preference :	
Apt./Suite No. :	603
City :	Honolulu
State :	HI
Zip Code :	96814
Email :	rocktang@excite.com
Telephone :	
Telephone Extension :	
Add to Mailing List :	Both
Submission Method :	Website
Other Submission Method :	
Submission Date :	11/24/2008
Submission Content/Notes :	Kudos to re-evaluating the Airport route. Given that we have 4.5 million visitors a year to Honolulu and numerous resident trips, it seem intuitive that we should proceed with an airport to Waikiki route. Let's build something our transit savvy guests (Japanese visitors especially) will want to use and make their trips more enjoyable and make them more likely to return.

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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HONOLULU, HAWAII 96813
Phone: (808) 768-8305 • Fax: (808) 768-4730 • Internet: www.honolulu.gov

MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-330794

Mr. Rock Tang
1448 Young Street
Apartment 603
Honolulu, Hawaii 96814

Dear Mr. Tang:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

Your preference for the Airport Alternative has been noted. While each of the alternatives discussed in the Draft EIS includes trade-offs between benefits and impacts, the Airport Alternative from East Kapolei to Ala Moana has been selected as the Preferred Alternative as described above. As compared to the alternatives discussed in the Draft EIS, the Airport Alternative will carry the most passengers, provide the greatest transit-user benefits, and result in the fewest vehicle hours of delay. It will provide access to employment centers at Pearl Harbor Naval Base and Honolulu International Airport and will serve the Salt Lake neighborhood with connecting bus service. Of the three Build Alternatives addressed in the Draft EIS, the Airport Alternative will have slightly less impacts to the natural and built environment analyzed in the Draft EIS. During the public comment period on the Draft EIS, the public overwhelmingly supported the Airport Alternative. Of the comments that specifically supported one of the

alternatives, more than 75 percent were in support of the Airport Alternative. For more information this selection is discussed in Section 2.4 of the Final EIS. Since publication of the Draft EIS, design has been advanced, further analysis has been completed, and information has been added in response to comments on the Draft EIS and agency coordination. The Final EIS discusses the process that was used to select the Preferred Alternative, how comments were considered in the decision-making process, impacts and mitigation commitments.

As shown in Figure 3-7, transit trips from the Airport to Waikiki will take approximately 40 minutes with the Project versus approximately 70 minutes under No Build conditions. This time is door to door and includes transfers.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
Creation Date :	12/6/2008
Creator Affiliation :	
First Name :	Earl
Last Name :	Tanioka
Business/Organization :	Retired Police Officer
Address :	827-1 Ala Lilikoi St.
Alternative Preference :	
Apt./Suite No. :	Apt#1
City :	Honolulu
State :	HI
Zip Code :	96818
Email :	taniokae002@hawaii.rr.com
Telephone :	808-833-3260
Telephone Extension :	
Add to Mailing List :	Email
Submission Method :	Website
Other Submission Method :	
Submission Oate :	12/06/2008
Submission Content/Notes :	Common Sense: Most traffic are people going to work or students going to school. Why then would you go through Salt Lake when more people work along the airport route and Nimitz Hwy. Salt Lake is more residential and very little business. Plus that area is too congested for building a superstructure like rail. C&C haven't even finished the widening of Salt Lake Blvd and Puuloa Rd.

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-331304

Mr. Earl Tanioka
827-1 Ala Lilikoi Street
Apartment 1
Honolulu, Hawaii 96818

Dear Mr. Tanioka:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall indentify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraph addresses your comments regarding the above-referenced submittal:

Your preference for the Airport Alternative has been noted. While each of the alternatives discussed in the Draft EIS includes trade-offs between benefits and impacts, the Airport Alternative from East Kapolei to Ala Moana has been selected as the Preferred Alternative as described above. As compared to the alternatives discussed in the Draft EIS, the Airport Alternative will carry the most passengers, provide the greatest transit-user benefits, and result in the fewest vehicle hours of delay. It will provide access to employment centers at Pearl Harbor Naval Base and Honolulu International Airport and will serve the Salt Lake neighborhood with connecting bus service. Of the three Build Alternatives addressed in the Draft EIS, the Airport Alternative will have slightly less impacts to the natural and built environment analyzed in the Draft EIS. During the public comment period on the Draft EIS, the public overwhelmingly supported the Airport Alternative. Of the comments that specifically supported one of the

alternatives, more than 75 percent were in support of the Airport Alternative. For more information this selection is discussed in Section 2.4 of the Final EIS. Since publication of the Draft EIS, design has been advanced, further analysis has been completed, and information has been added in response to comments on the Draft EIS and agency coordination. The Final EIS discusses the process that was used to select the Preferred Alternative, how comments were considered in the decision-making process, impacts and mitigation commitments.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

RT11/08-288760

To: Rail Route Comment Collectors.

Re: Salt Lake vs. Airport routes.

'08 NOV 24 P1:31 DTS RAPID TRANSIT

1. Go to both places.

a. There are supporters for both routes. Enough to say support justifies spending 1/2 #Billion. or whatever to cost.

b. Go cost less if you go both places in the same phase instead of later as a spur.

2. Get one riddah reason. To change, go Airport and tell Romy and Salt Lake Tough Shit go convince more of us to not trust Mufi and his cabinet. Even the guys who stay stuck selling this outrageously expensive project who are civil Service.

3. How long you think people go accept government telling us "Life is not fair, suck it up and shut up"?! Royal Kuwait NO MO BUS SERVICE! Now we gotta pay even more taxes to get NO SERVICE?! (For Rail)

Aloha

Alex

AR00003356

DEPARTMENT OF TRANSPORTATION SERVICES

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT11/08-288760R

Mr. Alexander M. Tanji
94-1062 Kapehu Street
Waipahu, Hawaii 96797

Dear Mr. Tanji:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

Your preference for the Airport & Salt Lake Alternative has been noted. While each of the alternatives discussed in the Draft EIS includes trade-offs between benefits and impacts, the Airport Alternative from East Kapolei to Ala Moana has been selected as the Preferred Alternative as described above. As compared to the alternatives discussed in the Draft EIS, the Airport Alternative will carry the most passengers, provide the greatest transit-user benefits, and result in the fewest vehicle hours of delay. It will provide access to employment centers at Pearl Harbor Naval Base and Honolulu International Airport and will serve the Salt Lake neighborhood with connecting bus service. Of the three Build Alternatives addressed in the Draft EIS, the Airport Alternative will have slightly less impacts to the natural and built environment analyzed in the Draft EIS. During the public comment period on the Draft EIS, the public overwhelmingly supported the Airport Alternative. Of the comments that specifically supported one of the alternatives, more than 75 percent were in support of the Airport Alternative. For more

information this selection is discussed in Section 2.4 of the Final EIS. Since publication of the Draft EIS, design has been advanced, further analysis has been completed, and information has been added in response to comments on the Draft EIS and agency coordination. The Final EIS discusses the process that was used to select the Preferred Alternative, how comments were considered in the decision-making process, impacts and mitigation commitments.

Your other comments have been noted.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

COMMENTS OF MARK TAYLOR ON
DRAFT ENVIRONMENTAL IMPACT STATEMENT
FOR HONOLULU RAIL TRANSIT PROJECT
December 9, 2008

Thank you for the opportunity to submit comments on the Draft EIS for the Honolulu Rail Transit Project. My name is Mark Taylor. I reside in the Salt Lake neighborhood of Honolulu and served from 1993 to 2007 as an elected member of the Aliamanu-Salt Lake-Foster Village Neighborhood Board.

I have three comments on the Draft EIS.

First, the opening paragraph of section 6.4.2 of the Draft EIS (entitled "Project Cash Flow") states that both the "Salt Lake and Airport Alternatives would be financially feasible." Yet this same paragraph states that the Airport Alternative would require $1.4 billion in Federal funding, and that the FTA "has not been approached to consider the $1.4 billion for the Airport Alternative."

Given that there is no indication that Federal funding at the $1.4 billion level will even be considered by the FTA, how can the Draft EIS state conclusively that the Airport Alternative is "financially feasible"? Unless and until the FTA indicates in writing that it is willing to consider providing $1.4 billion, the EIS should state that the Airport Alternative has not been shown to be financially feasible. To do otherwise is misleading and invites a fiscally imprudent policy decision on the initial transit alignment.

Second, Table 7-2 of the Draft EIS (entitled "Effectiveness of Alternatives in Improving Corridor Mobility") contains figures that appear questionable, if not incorrect.

- The table indicates that Transit Ridership in 2030 will be only 1% higher for the Airport Alternative than for the Salt Lake Alternative. Yet, it also indicates that Transit User Benefits will be 5% higher for the Airport Alternative than for the Salt Lake Alternative. This significant inconsistency should be either corrected or fully explained.

- The Airport Alternative's purported 5% advantage in Transit User Benefits equates to reduced travel time for all transit users of 800,000 hours per year compared to the Salt Lake Alternative. Yet, the Draft EIS indicates the Airport rail route actually takes longer to traverse than the Salt Lake rail route. In fact, assuming half of projected daily rail trips in 2030 include the portion of the system between Aloha Stadium and Middle Street, the Airport Alternative will increase travel time for rail users by over 500,000 hours per year[1]. How can the Airport Alternative *decrease* travel time for *all* transit users by 800,000 hours per year when it *increases* travel time for *rail* transit users by 500,000 hours per year? Again, this significant inconsistency should be either corrected or fully explained.

Third, Table 7-7 of the Draft EIS (entitled "Cost-effectiveness of the Build Alternatives") indicates the Salt Lake Alternative is more cost-effective than the Airport Alternative, but only by a small margin. The figures in this table are derived by dividing the cost of the system under each build alternative by the number of hours of Transit User Benefits it produces. Therefore, if in fact there are any revisions to the Transit User Benefits in Table 7-2 in light of the discrepancies identified above, Table 7-7 should also be revised to reflect the impact on the relative cost-effectiveness of each build alternative.

Thank you again for the opportunity to comment.

[1] 90,000 projected daily trips multiplied by ½, multiplied by 2 minutes longer per trip, multiplied by 365 days per year, divided by 60 minutes per hour, equals 547,500 hours.

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-331793

Mr. Mark Taylor
3427 Ala Hinalo Street
Honolulu, Hawaii 96818

Dear Mr. Taylor:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall indentify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

The statement in the Draft EIS was correct at the time it was written, namely that "FTA has agreed to consider a funding request of $1.2 billion but has not been approached regarding a higher level." FTA has now been approached about a higher funding level recognizing the Airport Alternative's higher cost. The higher number of $1.55 billion is reflected in Chapter 6 of the Final EIS. The level of Federal funding described in the Final EIS is based on discussions with FTA about a reasonable level of support. While indications are positive, an official FTA commitment cannot be made until Congress acts to approve the Project's appropriation in a Full Funding Grant Agreement. Section 6.6 of the Final EIS describes the risks and uncertainties associated with project funding.

Transit-user benefits, which are a measure of time and costs saved, include both those that accrue to new riders as well as those that accrue to existing riders. Because the majority of

benefits accrue to existing riders, the ratio of total user benefits for the Airport Alternative compared to the Salt Lake Alternative is greater than the ratio of total transit riders for the Airport
Alternative compared to the Salt Lake Alternative. There are more people using the fixed guideway destined to the activity centers on the Airport Alternative alignment (mostly employees) than there are people starting in the Salt Lake area (mostly residents).

All transit users are not equally affected by the differences between the Salt Lake and Airport alignments. The rail in-vehicle time for a trip from East Kapolei to Ala Moana Center is two minutes longer for the Airport Alternative than for the Salt Lake Alternative. Thus, transit travelers making that trip lose time benefits with the Airport Alternative as compared to the Salt Lake Alternative. In addition, because of the longer travel time, there are somewhat fewer transit trips forecast between, for instance, Kapolei and Ala Moana Center for the Airport Alternative than for the Salt Lake Alternative (compare Tables 3-25 and 3-39 in the Travel Forecasting Results Report). However, the Airport Alternative serves other markets substantially better than the Salt Lake Alternative, such as Ewa or Kapolei to Pearl Harbor or the Airport, resulting both in more transit riders and shorter travel times for existing transit riders. In summary, the Airport Alternative, even though it has a slightly longer rail travel time from end to end than the Salt Lake Alternative, results in forecast increases in total transit trips (of 1 percent) and in fixed guideway riders (of 8 percent) because it serves different markets.

User benefits presented in the Draft EIS are correct. There is no change in the relationship between the Salt Lake and Airport Alternatives cost-effectiveness ratios. Further refinement to the travel forecast model since the Draft EIS was published has lowered the cost-effectiveness ratio for the Airport Alternative in the Final EIS.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Fyi: * next page. Apart from that, Happy Holidays.

A Leaderless Rail to Nowhere

Mufi says his electric train set is better than Ann's Lego-bus-bridge, a bridge that creates an bus-exclusive new H4, like H3 with no exits, from Ewa to Downtown. When will our elected leaders give us leadership with insight, rather than propose compromised either/or choices on the issue of transportation?

Dean Uchida in last Sunday's opinion piece (Star-Bulletin, p. E3) states, "the underlying issue is growth, not traffic." More specifically, it's land use, not traffic.

What makes the issue so compromised results from the fact that the O'ahu land holders come in two main categories: (1) Individual ownership in fee simple and (2) Trust ownership held exclusively by trustees for the common use of others (Federal Lands) and/or parceled out for individual use through leaseholds (Kamehameha Schools Trust, O.H.A., Public Lands). The first relates to lands that most would call, "private property" where the owners can sell it, like any other commodity to anyone else they please. The second form of land holding *in toto*, consists of property held in common for the benefit of a group of people and cannot be privatised to individuals by sale except under circumstances defined in the trust.

Nine percent of the level, arable land in the state of Hawai'i remains in the control of the Kamehameha Schools' Trust (The heir of Bernice Bishop's conveyance of all the "Royal Lands" to the benefit of the native Hawaiian peoples and their descendants.) Add to this the Office of Hawaiian Affairs lands, and those held by the State and the City and County of Honolulu, we can see that much, if not most all of the land in Hawai'i is held as a public trust for everyone or for all Hawaiian descendents and their *ohanas* collectively. Therefore, in no small measure, the common good of the Hawaiian people and the other citizens of the State and City and County of Honolulu should determine the optimal form of public transportation. Instead, they shift its cost to the tax base and declare it a universal benefit to all residents.

What confuses the matter are the large royal tracts of land that king's conveyed to relatives or retainers for exceptional service to the crown.

Unlike Mr. Bishop, who re-conveyed all of the remaining Royal Lands into a trust for the benefit of the native Hawaiians upon his wife's death and returned to live out his remaining years in San Francisco, others did not follow his example.

The beneficiaries of the Campbell Estate, for example, who had intermarried and became descendants of Prince Kuhio, held on to their large West O'ahu land holdings in a trust until 2007 when it was converted in a private family-owned corporation.

When it became no longer profitable to cultivate sugar cane and pineapple on these plantation plots, the beneficiaries sought to make the most of their privatised inheritance by converting the lands into residential housing sites. They pulled out the cash crops and planted individual fee simple single family homes that created a huge cash return and the suburban sprawl we now see from Waipahu to Kapolei.

To get past the federal lands held exclusively by the U.S. military in Pearl Harbor and south from Wahiawa, a narrow corridor of concrete was paved, and then expanded into the H1 freeway. Access to West O'ahu was assured. Development could move forward.

With the admission of Hawai'i in the United States as a state, the large landed estates became anomalies in the fee simple world of U.S. real estate. With the death of James Campbell's last surviving daughter, Beatrice Wrigley in 1987, the estate had twenty years, according to Campbell's will, to dissolve the trust and redistribute itself to its surviving heirs. The Campbell Estate thus expired in 2007. Rather than kill "the goose that laid the golden eggs," it was incorporated into the James Campbell Co. LLC. Most of the beneficiaries, thirty-one family members, became shareholders in the new company. Now the problem compounds. The new company secured $645 million in debt financing in 2007 to create the new company and to fund its future investments.

From 1987 to 2007 the rush was on to develop more residential housing leaving it to the new owners to create the infrastructure as the needs arose. Now the company faces a cloudy financial picture given the collapse of the national financial system and the freezing of credit for housing. They hold a lot of debt with

a reduced income stream and a large chunk of undeveloped land that must be sold to have value.

To cover its maturing debts and to protect its developed assets in a depressed housing market devoid of easy credit, the company will probably have to sell a lot of raw land to just cover its current debt obligations in an attempt to realize its master development plan. The free market may cause the re-conveyance of these privatized lands to those who still have the cash and the duty to serve the common good: the Kamehameha Schools' Trust, the O.H.A., and the State of Hawai'i (We can buy Turtle Bay, can't we?) and the City and County of Honolulu (How much do we plan to pay for rail right-a-ways?).

Let the market set the price and, therefore, the tax rate on the land. With a little patience and with regular purchases, these four agencies should be able to acquire large tracts of undeveloped land in West O'ahu by 2010. The general public should be rewarded with a combined total of thousands of acres of new lands that can be converted to agricultural use and greater food independence (if not total self-sufficiency) without having to use the right of eminent domain to acquire them. (Energy independence is not our only common need.)

Now, all this raises the question: What would our transportation system look like given these new circumstances:

1. We have a lot of West O'ahu homeowners living in devalued homes with special needs that we need to accommodate.

2. We need to design a diversified crop and fruit tree development that can yield three harvests annually for all available lands.

3. We need to bring workers directly—non-stop--to their places of work at low cost and reduce road traffic congestion.

4. East O'ahu homeowners also suffer from unmet transportation and infrastructure needs as West O'ahu, we must identify and equitably resolve these urban dysfunctions.

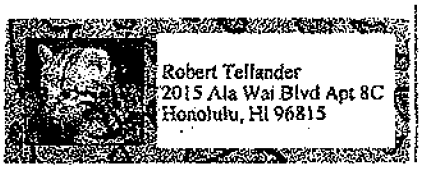
Rather than explain and expand on my own perspectives, however, I want my elected and wanna-be leaders to focus on and to respond to these four areas of concern. If they cannot: Do Not Vote for them.

If you are as frustrated as I am by the ineptitude to act insightfully and to resolve pressing social needs, may be you and I should start talking with our friends and neighbors to craft our own solutions and cause our elected leaders to follow our lead.

2008, as it turned out, is a Jubilee Year. Those with integrity, ethical insight and compassion for strangers will be rewarded whenever their proposals practically and for the better resolve some of our most currently compromised needs.

We should do that and not try to say an electric train solves these problems nor a non-stop bus ride to Downtown makes life better for all in O'ahu. It's inadequate leadership on a rail.

Robert Tellander
2015 Ala Wai Blvd. #8c
Honolulu, HI 96815-2002
808-946-9974



CHRISTMAS 2008

Married at 30; still together at 70.

After the completion of the condo remodel--an even more trying joint-venture--we pulled ourselves together and set off to celebrate our 40th wedding anniversary where it all began. This time, we returned to visit persons and places as members of the senior generation: Time had not stood still.

At the end of May, we left Lars (34), our youngest son, the Academy of Art guard, in Honolulu and commenced our two-month odyssey into our shared past. We started with our most recent memories among friends in Petaluma, CA; classmates at Princeton, NJ, and former roommates in the Washington, D.C. area. Then back to Europe and our families' origins.

First, to Paris, our honeymoon destination, among friends and family and on to Holland among Dutch friends and Feldbrugge cousins. (Breaking the pattern, we made a five-day detour among strangers to Prague.)

We picked up the family trail again in Sweden among the Tellander family cousins before returning to Boston where Erik (37), our oldest son, the architect [Wm. Rawn, Boston], picked us up and drove to his "new" (1801 A.D.) colonial manse on the Common in Amherst ,NH. Here we got reacquainted with our grandchildren, Maja (5) and Nils (3) and our daughter-in-law, Lisa (37) and her visiting Housman parents, Ted and Margaret (Cape Cod), and sister, Karen (Singapore). (All of these members of our immediate and extended family will be coming to Honolulu for this Christmas and NEW year.)

We flew from New York City in separate airplanes: Marlise to Honolulu and Bob to Los Angeles, CA to visit his brother, Jack (75), in his nursing home in Santa Monica, CA and then home to Honolulu.

To see glimpses of what we saw, come visit us in Hawaii so you can show us what we missed while we were away from you. Let's have a happy NEW year! With all those we still know and love.

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, 3RD FLOOR
HONOLULU, HAWAII 96813
Phone: (808) 768-8305 • Fax: (808) 768-4730 • Internet: www.honolulu.gov

MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT12/08-289468R

Mr. Robert Tellander
2015 Ala Wai Boulevard
Apartment 8C
Honolulu, Hawaii 96815

Dear Mr. Tellander:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

Your comments have been noted. The Project will provide direct transit access to several major employment areas in Honolulu. As indicated in Figure 3-7 in the Final EIS, transit travel times will be considerably less with the Project during commute periods (a.m. peak period) compared to existing conditions and future 2030 conditions without the Project.

As indicated in Section 1.7 of the Final EIS, the purpose of the Project is to provide high-capacity rapid transit in the transportation corridor between Kapolei and UH Manoa. The Project described in Chapter 2 of the Final EIS will serve the corridor between East Kapolei and Ala Moana Center via the Airport. Communities in East Honolulu will still benefit with the added local bus service that will be provided to the Ala Moana Station.

Lastly, the goals of the Project correspond to the need for transit improvements, as described in Section 1.8 of the Final EIS. Although important issues in their own right, West Oahu home values, special needs, and diversified crops are not the focus of this study. Improving transportation equity is a goal of the Project. Section 1.8 of the Final EIS includes a summary that includes workers and other commuters that need access to reliable and affordable transportation.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

From: Ted.Matley@dot.gov [mailto:Ted.Matley@dot.gov]
Sent: Thursday, January 22, 2009 1:39 PM
To: Miyamoto, Faith
Subject: FW: Honolulu City Rail Proposal

From: Suzanne Telfer [mailto:suzantell@earthlink.net]
Sent: Monday, December 29, 2008 4:49 PM
To: Matley, Ted <FTA>
Subject: Honolulu City Rail Proposal

Mr. Wayne Y. Yoshioka
Department of Transportation Services
City and County of Honolulu
Honolulu Hale, 3rd Floor
Honolulu, HI 96813

Dear Wayne Yoshioka:

Thank you for taking time to read this taxpayer's view of the City's rail proposal.

As you know, this heavy rail project is the most controversial project ever undertaken in Honolulu since Hawaii became a State. And when a project is so controversial and costly (inspite of a maneuvered vote of approval) it will be plagued by unalterable problems and cost overruns FOREVER.

This Island is a fragile eco-system that should not be completely covered over in cement or it will die. The heavy rail system is designed

to do just that. Each mile of it will lead an unending plethora of cement structures from one end of the route to the other. This is not right for people, land, animals, flora and fauna, or LIFE ITSELF ON THIS ISLAND.

A light rail system would suffice and not be as obtrusive, controversial, costly or destructive. Please do not bail out the unions at the expense of our fragile eco-
system Fifty years of living here tells me heavy rail is not right at all.

UA MAU KE EA O KA 'AINA I KA PONO. (The life of the land is preserved in righteousness.)

Very truly yours,

Suzanne Teller
(Mrs. Albert Teller)

Mrs. Albert Teller
1541 Kalakaua Ave. #1510
Honolulu, HI 96826

1/23/2009

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT12/08-293202R

Ms. Suzanne Teller
1541 Kalakaua Avenue, #1510
Honolulu, Hawaii 96826

Dear Ms. Teller:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

To answer your comments, each mile of guideway will include the construction of one mile of elevated structure approximately 30 feet wide and any associated stations. The majority of the area crossed is already paved, and in those locations the Project will not increase impervious surface.

The Alternatives Screening Memorandum (DTS 2006a) recognized the visually sensitive areas in Kakaako and Downtown Honolulu, including the Chinatown, Hawaii Capital, and Thomas Square/Honolulu Academy of Arts Special District. To minimize impacts on historic resources, visual aesthetics, and surface traffic, the screening process considered 15 combinations of tunnel, at-grade, or elevated alignments between Iwilei and Ward Avenue. Five different alignments through Downtown Honolulu were advanced for further analysis in the Alternatives Analysis, including an at-grade portion along Hotel Street, a tunnel under King

Street, and elevated guideways along Nimitz Highway and Queen Street (Figure 2-4).

The Alternatives Analysis Report (DTS 2006b) evaluated the alignment alternatives based on transportation and overall benefits, environmental and social impacts, and cost considerations. The report found that an at-grade alignment along Hotel Street would require the acquisition of more parcels and could potentially affect more burial sites than any of the other alternatives considered. The alignment with at-grade operation Downtown and a tunnel under King Street, was not selected because of the environmental effects, such as impacts to cultural resources, reduction of street capacity, and property acquisition requirements of the at-grade and tunnel sections, which would cost an additional $300 million.

The Project's purpose is "to provide high-capacity rapid transit" in the congested east-west travel corridor (see Section 1.7 of the Final EIS). The need for the Project includes improving corridor transit mobility and reliability. The at-grade alignment would not meet the Project's Purpose and Need because it could not satisfy the mobility and reliability objectives of the Project (see bullets below). Some of the technical considerations associated with an at-grade versus elevated alignment through Downtown Honolulu include the following:

- ***System Capacity, Speed, and Reliability***—*The short, 200-foot (or less) blocks in Downtown Honolulu would permanently limit the system to two-car trains to prevent stopped trains from blocking vehicular traffic on cross-streets. Under ideal operational circumstances, the capacity of an at-grade system could reach 4,000 passengers per hour per direction, assuming optimistic five minute headways. Based on travel forecasts, the Project should support approximately 8,000 passengers in the peak hour by 2030. Moreover, the Project can be readily expanded to carry over 25,000 in each direction by reducing the interval between trains (headway) to 90 seconds during the peak period. To reach a comparable system capacity, speed, and reliability, an at-grade alignment would require a fenced, segregated right-of-way that would eliminate all obstacles to the train's passage, such as vehicular, pedestrian, or bicycle crossings. Even with transit signal priority, the at-grade speeds would be slower and less reliable than an elevated guideway. An at-grade system would travel at slower speeds due to the shorter blocks, tight and short radius curves in places within the constrained and congested Downtown street network, the need to obey traffic regulations (e.g., traffic signals), and potential conflicts with other at-grade activity, including cars, bicyclists, and pedestrians. These effects mean longer travel times and far less reliability than a fully grade-separated system. None of these factors affects an elevated rail system. The elevated rail can travel at its own speed any time of the day regardless of weather, traffic, or the need to let cross traffic proceed at intersections.*

- ***Mixed-Traffic Conflicts***— *The Project will run at three minute headways. However, three-minute headways with an at-grade system would prevent effective coordination of traffic signals in the delicately balanced signal network in downtown Honolulu. A disruption of traffic signal cycle coordination every three minutes would severely affect traffic flow and capacity of cross-streets. Furthermore, there would be no option to increase the capacity of the at-grade rail*

system by reducing the headway to 90 seconds, which would only exacerbate the signalization problem. An at-grade system would require removal of two or more existing traffic lanes on affected streets. This effect is significant and would exacerbate congestion. Congestion would not be isolated to the streets that cross the at-grade alignment but, instead, would spread throughout Downtown. The Final EIS shows that the Project's impact on traffic will be isolated and minimal with the elevated rail, and, in fact will reduce system-wide traffic delay by 18 percent compared to the No Build Alternative (Table 3-14 in the Final EIS). The elevated guideway will require no removal of existing through travel lanes, while providing a reliable travel alternative. When traffic slows, or even stops due to congestion or incidents, the elevated rail transit will continue to operate without delay or interruption.

An at-grade light rail system with continuous tracks in-street would create major impediments to turning movements, many of which would have to be closed to eliminate a crash hazard. Even where turning movements are designed to be accommodated, at-grade systems experience potential collision problems. In addition, mixing at-grade fixed guideway vehicles with cars, bicyclists, and pedestrians presents a much higher potential for conflicts compared to grade-separated conditions. Where pedestrian and automobiles cross the tracks in the street network, particularly in areas of high activity (e.g., station areas or intersections), there is a risk of collisions involving trains that does not exist with an elevated system. There is evidence of crashes between trains and cars and trains and pedestrians on other at-grade systems throughout the country (e.g., Phoenix, Houston, LA). This potential would be high in the Chinatown and Downtown neighborhoods, where the number of pedestrians is high and the aging population presents a particular risk.

- ***Construction Impacts***—*Constructing an at-grade rail system could have more effects than an elevated system in a number of ways. The wider and continuous footprint of an at-grade rail system compared to an elevated rail system (which touches the ground only at discrete column foundations, power substations, and station accessways) increases the potential of utility conflicts and impacts to sensitive cultural resources. In addition, the extra roadway lanes utilized by an at-grade system would result in increased congestion or require that additional businesses or homes be taken to widen the roadway through Downtown. Additionally, the duration of short-term construction impacts to the community and environment with an at-grade system would be considerably greater than with an elevated system. Because of differing construction techniques, more lanes would need to be continuously closed for at-grade construction and the closures would last longer than with elevated construction. This would result in a greater disruption to business and residential access, prolonged exposure to construction noise, and traffic impacts.*

Because it is not feasible for an at-grade system through Downtown to move passengers rapidly and reliably without significant detrimental effects on other transportation system elements (e.g., the highway and pedestrian systems, safety, reliability, etc.), an at-grade system

would have a negative system-wide impact that would reduce ridership throughout the system. The at-grade system would not meet the Project's Purpose and Need and, therefore, does not require further analysis.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT11/09-340096

Mr. Lawson Teshima
650 Iwilei Road, Suite 415
Honolulu, Hawaii 96817

Dear Mr. Techima:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

The Final EIS identifies the Airport Alternative as the Preferred Alternative. While each of the alternatives discussed in the Draft EIS includes trade-offs between benefits and impacts, the Airport Alternative from East Kapolei to Ala Moana has been selected as the Preferred Alternative as described above. As compared to the alternatives discussed in the Draft EIS, the Airport Alternative will carry the most passengers, provide the greatest transit-user benefits, and result in the fewest vehicle hours of delay. It will provide access to employment centers at Pearl Harbor Naval Base and Honolulu International Airport and will serve the Salt Lake neighborhood with connecting bus service. Of the three Build Alternatives addressed in the Draft EIS, the Airport Alternative will have slightly less impacts to the natural and built environment analyzed in the Draft EIS. During the public comment period on the Draft EIS, the public overwhelmingly supported the Airport Alternative. Of the comments that specifically supported one of the alternatives, more than 75 percent were in support of the

Airport Alternative. For more information this selection is discussed in Section 2.4 of the Final EIS. Since publication of the Draft EIS, design has been advanced, further analysis has been completed, and information has been added in response to comments on the Draft EIS and agency coordination. The Final EIS discusses the process that was used to select the Preferred Alternative, how comments were considered in the decision-making process, impacts and mitigation commitments.
The following paragraphs address the comments contained in your submittal:

There is, at this point, no commitment from the FTA for a specific amount of federal funding. The $1.2 billion has been discussed in the past and now $1.55 billion has been identified in the Final EIS and reflected in FTA's approval for the Project to enter Preliminary Engineering. These amounts have not raised major concerns from the FTA. It is a requirement for the Project to identify an anticipated federal amount in its pro forma cost analyses. The FTA will only commit the funding once the full environmental and New Starts processes have been completed. For the Project, because the percentage of local matching funds (75 percent or more) is so high compared to the average of less than 50 percent, the additional $200 million is still well within a reasonable request.

No election-related advertising was funded by the City. Expenditure of taxpayer funds has been limited to providing factual information about the Project. Guidelines set forth by NEPA and Chapter 343 of the Hawaii Revised Statutes stipulate that public involvement be carried out on large-scale projects such as the rail project. As one of the largest infrastructure projects ever to be constructed on Oahu, the City felt that it was important to disseminate information to as many people as possible. Thus, a broad range of print and visual media was necessary to reach different population segments. Project funds paid for the public involvement activities that are listed in Chapter 8 of the Final EIS.

Chapter 6 of the Final EIS presents the current estimate of the amount of the County General Excise and Use Tax (GET) Surcharge and discusses the uncertainties associated with the estimate. The GET forecast presented in the Final EIS takes the current economic downturn into account, including lower projections of tourism over the next several years, and slower growth projections in services, contracting, and rentals. The forecast assumes that GET surcharge revenues will grow from current levels as Oahu's population and economic activity increases, and as a function of inflation over the period. The financial plan is a dynamic document that will be updated as conditions warrant. DTS will continue to monitor and update the revenue forecasts and refine the financial plan as the Project proceeds through FTA's New Starts process. As stated in Chapter 6 of the Final EIS, GET collections will raise $3.5 billion by 2022. The Project as presented in the Final EIS does not include any proposals to exempt certain industries from taxes currently in place.

The Project as presented in the Final EIS is a rail line from East Kapolei to Ala Moana Center via Honolulu International Airport. The Project does not include rail service into Waikiki. As stated in Chapter 2 of the EIS, future extensions are planned from Ala Moana Center to UH Manoa and Waikiki. The future extensions are not part of the Project; thus, they are not required to be evaluated under Chapter 343 of the Hawaii Revised Statutes and NEPA. Under NEPA, environmental analysis is only required when there is a proposed action by a federal agency. Here, because the future extensions are not proposed for implementation at this time,

they are not part of the Project studied in the Final EIS. It would be premature to undertake an environmental analysis of the extensions (beyond the cumulative impacts analysis) because they are not part of the proposed action to be taken by the City and FTA. When the future extensions are proposed for implementation at some time in the future, environmental analysis of the extensions and appropriate alternatives will be undertaken at that time.

As shown in Chapter 3 of the Final EIS, the number of visitors who will use the fixed guideway is relatively small compared to other users. For example, approximately 10,000 of the 116,000 daily fixed guideway boardings will be made by visitors. Further, as shown in Table 3-12 in the Final EIS, effects on tour operators because of the Project are expected to be minimal.

The City intends to comply with 49 U.S.C. § 5323(d), which limits charter service provided by federally assisted public transportation operators. FTA regulations specify these limitations in 49 CFR Part 604, Charter Service. The City cannot engage in charter service unless permitted by FTA charter service regulations. See Circular C-9300.1B, Capital Investment Program Guidance and Application Instructions issued, November 1, 2008.

The City has no authority to dictate how the federal government chooses to award federal grant monies. Grant programs overseen by the FTA are subject to its own rules and regulations. For example, according to FTA Circular C-9300.1B, the Bus and Bus-Related Facilities portion of the Capital Investment Program (Bus Program) is available to states and local governments, as well as sub-recipients, such as public agencies, private companies engaged in public transportation, and private non-profit organizations, are eligible to receive funds under the Bus Program. Whether Polynesian Hospitality qualifies for the Bus Program would depend on whether it meets these and other requirements under appropriate federal rules and regulations.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

From: Ted.Matley@dot.gov [mailto:Ted.Matley@dot.gov]
Sent: Thursday, January 22, 2009 1:42 PM
To: Miyamoto, Faith
Subject: FW: No Subject

From: BakiProp@aol.com [mailto:BakiProp@aol.com]
Sent: Thursday, December 11, 2008 12:43 AM
To: Matley, Ted <FTA>
Subject: No Subject

Sir

State of Honolulu, is taxing us right and left Double taxing. Higher taxes, killing small businesses. Tourism is dried up. Waikiki beaches, Hotels are empty. Where will we get the Money to pay for this elephant called the Rail Transit? It will die a thousand death not it will take 15 years to built it. Just like the Boston Beautification.

Not now. Please.

Robert Thomas

****

Make your life easier with all your friends, email, and favorite sites in one place. Try it now.
(http://www.aol.com/?optin=new-dp&icid=aolcom40vanity&ncid=emlcntaolcom00000010)

1/23/2009

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010 RT9/09-332253

Mr. Robert Thomas
bakiprop@aol.com

Dear Mr. Thomas:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraph addresses your comments regarding the above-referenced submittal:

Chapter 6 of the Final EIS describes the funding sources anticipated to be used to pay for the capital costs of the Project and the City's overall public transportation system. Capital costs of the Project, including finance charges, are expected to be fully paid for by a combination of FTA Section 5307 and FTA Section 5309 New Starts funds from the Federal government and the County's General Excise and Use Tax Surcharge levied from 2007 through 2022. Section 6.4 of the Final EIS describes the funding sources to pay for ongoing operations and maintenance costs associated with maintaining the transit system in a state of good repair. Operating and maintenance costs will be paid for from the same sources currently used for TheBus, which includes Federal funding, fare revenues, and subsidies from the General and Highway Funds.

The FTA and DTS appreciate your interest in the Project. The Final EIS has been issued in conjunction with the distribution of this letter. You may view the Final EIS on the

Project website at www.honolulutransit.org. You may request a DVD of the Final EIS and additional content through the "Contact Us" tab on the website or by calling the Project hotline at 566-2299. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Status :	Initial Action Needed
Creation Date :	12/4/2008
Creator Affiliation :	
First Name :	Daniel-W.
Last Name :	Tiedge
Business/Organization :	University of Bremen, Germany
Address :	Carl-Severing-Str. 28
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Apt./Suite No. :	
City :	Bremen, Germany
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Telephone Extension :	
Add to Mailing List :	Both
Submission Method :	Website
Other Submission Method :	
Submission Date :	12/04/2008

Submission Content/Notes : Dear Sir or Madam,

I am a 23-year old student writing you from Bremen, Germany, where I studdy geography at the local university.
I think it is excellent that the Honolulu rail transit project has been approved by the voters.
I lived and went to high school (McKinley) in Honolulu for a total of 1,5 years. So I am well aware of the traffic problems the city and residents heve to face everyday.
Being an experienced rail-rider and a fan of rail-based mass-transit, I strongly believe that bringing rail transit to Oahu will be a successful project.

This Christmas I will be in Honolulu for a period of three weeks. And my question is now, if is any opportunity to some volunteer-work at your agency while I am there.
That would be a great way for me to gain some experience abroad as plan to make my living later on by promoting and planning rail-based transit in the US.
And may be you could even benefit from me being an experienced rail-rider.

Mahalo for taking the time to read my message.
Your sincerely
Daniel Tiedge

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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HONOLULU, HAWAII 96813
Phone: (808) 768-8305 • Fax: (808) 768-4730 • Internet: www.honolulu.gov

MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-331288

Mr. Daniel W. Tiedge
Carl-Severing-Str. 28
Bremen 28329
GERMANY

Dear Mr. Tiedge:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall indentify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraph addresses your comments regarding the above-referenced submittal:

Your preference for a Fixed Guideway Transit Alternative has been noted. While each of the alternatives discussed in the Draft EIS includes trade-offs between benefits and impacts, the Airport Alternative from East Kapolei to Ala Moana has been selected as the Preferred Alternative as described above. As compared to the alternatives discussed in the Draft EIS, the Airport Alternative will carry the most passengers, provide the greatest transit-user benefits, and result in the fewest vehicle hours of delay. It will provide access to employment centers at Pearl Harbor Naval Base and Honolulu International Airport and will serve the Salt Lake neighborhood with connecting bus service. Of the three Build Alternatives addressed in the Draft EIS, the Airport Alternative will have slightly less impacts to the natural and built environment analyzed in the Draft EIS. During the public comment period on the Draft EIS, the public overwhelmingly supported the Airport Alternative. Of the comments that specifically supported one of the

alternatives, more than 75 percent were in support of the Airport Alternative. For more information this selection is discussed in Section 2.4 of the Final EIS. Since publication of the Draft EIS, design has been advanced, further analysis has been completed, and information has been added in response to comments on the Draft EIS and agency coordination. The Final EIS discusses the process that was used to select the Preferred Alternative, how comments were considered in the decision-making process, impacts and mitigation commitments.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

From: Djou, Charles
Sent: Tuesday, December 09, 2008 9:47 AM
To: Matsuda, Sylvia
Subject: FW: RAIL PHASING

Please add to DEIS comments

Charles K. Djou
Councilmember, District IV (Waikiki, East Honolulu)
Honolulu City Council
530 South King Street, Suite 202
Honolulu, Hawaii 96813
Phone: (808) 768-5004
Fax: (808) 550-6689
Email: cdjou@honolulu.gov
Web: www.honolulu.gov/council/d4

From: Steve Timpson [mailto:stimpson@hawaii.rr.com]
Sent: Monday, December 08, 2008 11:43 AM
To: Djou, Charles
Subject: RAIL PHASING

Charles,

Thank you for looking into the logic of the currently announced phasing of the rail. The only logic supporting constructing the first phase of the rail in the country is to make available jobs sooner than would be if work starts in town. Think of it as to who would be using a system that starts in Ewa and ends in Aeia? People are not going to drive to Ewa, leave their cars there, ride the rail to Aeia, and them take some other means to travel into town, which will mean that the ridership counts will be way down, which then fuels the fire from people not favoring rapid transit about stopping future phases since nobody is using the system
San Francisco, and all the other cities that have built rapid transit systems all sequence the phasing to start in town and then extend the system into the suburbs as use increases. All these locations have done so even though the downtown section is more difficult and costly

Please continue to pursue the re-phasing as it just does not make any sense

Thanks

Steve Timpson
Goto Construction
216-9525

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

May 21, 2010

RT9/09-334561

Mr. Steve Timpson
stimpson@hawaii.rr.com

Dear Mr. Timpson:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraph addresses comments regarding the above-referenced submittal:

As described in Section 2.5.10 of the Final EIS, to support phased opening of the system, the first construction phase must be connected to a maintenance and storage facility, which requires considerable land. The first phase of the Project must be connected to the maintenance and storage facility because, in addition to maintenance of equipment and ongoing operations, the maintenance and storage facility houses the main control center for the entire Project, and the required testing and operation of the system could not be completed without access to it. No location has been identified closer to Downtown with sufficient available land to construct a maintenance and storage facility. The Project will be constructed in phases to accomplish the following:

- *Match the anticipated schedule for right-of-way acquisition and utility relocations*

- *Reduce the time that each area will experience traffic and community disturbances*
- *Allow for multiple construction contracts with smaller contract size to promote more competitive bidding*
- *Match the rate of construction to what can be maintained with local workforce and resources*
- *Balance expenditure of funds to minimize borrowing*

The portion of the corridor Ewa of Pearl Highlands is less developed than the areas Koko Head. Right-of-way can be obtained more quickly; therefore, overall project construction can begin earlier, resulting in lower total construction costs. Construction is planned to continue uninterrupted Koko Head from Pearl Highlands to Aloha Stadium, then Kalihi, and finally to Ala Moana Center.

The FTA and DTS appreciate your interest in the Project. The Final EIS has been issued in conjunction with the distribution of this letter. You may view the Final EIS on the Project website at www.honolulutransit.org. You may request a DVD of the Final EIS and additional content through the "Contact Us" tab on the website or by calling the Project hotline at 566-2299. Issuance of the Record of Decision under NEPA and acceptance of the Final EIS by the Governor of the State of Hawaii are the next anticipated actions and will conclude the environmental review process for this Project.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Status :	Initial Action Needed
Creation Date :	2/5/2009
Creator Affiliation :	
First Name :	James
Last Name :	Tokishi
Business/Organization :	
Address :	
Alternative Preference :	
Apt./Suite No. :	
City :	
State :	HI
Zip Code :	96816
Email :	j.tokishi@gmail.com
Telephone :	
Telephone Extension :	
Add to Mailing List :	Email
Submission Method :	Website
Other Submission Method :	
Submission Date :	02/05/2009
Submission Content/Notes :	My concern regarding the DEIS is that there is no updated revenue information. In 2006, the economy was strong, and Parsons Brinckerhoff used three numbers, a "conservative" estimate, and two fifteen-year projections using information from the Hawaii Council on Revenues, despite the CoR only making predictions for a few years in the future. In the two years (2007, 2008) following the release of the Alternatives Analysis, the 0.5% GET transit tax has not met even the lowest revenue forecasts, shown in table 5-4 in the AA. Despite this, the DEIS uses the middle forecast to estimate the total revenue available to the rail project. Even in 2007, before the economic downturn of 2008, revenues were far below their predicted values. It seems clear both that the original estimates were far too optimistic, and that the projections need to be reevaluated due to the current economic climate.

DEPARTMENT OF TRANSPORTATION SERVICES

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010 RT9/09-334578

Mr. James Tokishi
j.tokishi@gmail.com

Dear Mr. Tokishi:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraph addresses your comments regarding the above-referenced submittal:

The General Excise and Use Tax (GET) surcharge revenue estimate presented in the Draft EIS was based on information available at the time the Draft EIS was prepared. It was an updated forecast compared to the forecasts prepared for the Alternatives Analysis, and it reflected the actual receipts of surcharge monies that had been received at the time the Draft EIS was prepared. The Final EIS reflects more recent information about costs and revenues based on the latest forecasts from the spring of 2009. Specifically, in Chapter 6 of the Final EIS, the GET surcharge revenues have been adjusted downward to show the effect of the flagging economy on revenue collections. The City will continue to monitor and update the revenue forecasts as the Project proceeds through FTA's New Starts process.

The FTA and DTS appreciate your interest in the Project. The Final EIS has been issued in conjunction with the distribution of this letter. You may view the Final EIS on the Project website at www.honolulutransit.org. You may request a DVD of the Final EIS and

additional content through the "Contact Us" tab on the website or by calling the Project hotline at 566-2299. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Status :	Initial Action Needed
Creation Date :	11/6/2008
Creator Affiliation :	
First Name :	Barbara
Last Name :	Tom
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Address :	753 Kalanipuu St
Apt./Suite No. :	
City :	Honolulu
State :	HI
Zip Code :	96825
Email :	bltx59@hawaii.rr.com
Telephone :	395-3903
Telephone Extension :	
Add to Mailing List :	None
Submission Method :	Website
Other Submission Method :	
Submission Date :	11/06/2008
Submission Content/Notes :	Do you really think rail will cost only 4.8 Billion? I expect my grandchildren will pay dearly and will not benefit since they will not be riders and will not work in construction or food service, which I envision to be the main jobs created. How many City projects have com in on time and in budget? What is the usual cost overrun? Do you expect cost over estimates for Rail? I voted againt rail because I think it is too costly but I don't know what the answer is to traffic. By the way, I suspect your estimate of the fix to traffic is way over because I don't think rail will ease traffic except in rush hour and only for the residents of Kapolei and Ewa beach - otherwise the train will be empty and there isn't much traffic then anyway.

DEPARTMENT OF TRANSPORTATION SERVICES

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-330384

Ms. Barbara Tom
753 Kalanipuu Street
Honolulu, Hawaii 96825

Dear Ms. Tom:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

Your opposition to the Fixed Guideway Transit Alternative has been noted. While each of the alternatives discussed in the Draft EIS includes trade-offs between benefits and impacts, the Airport Alternative from East Kapolei to Ala Moana has been identified as the Preferred Alternative as described above. Compared to the other alternatives discussed in the Draft EIS, the Airport Alternative will carry the most passengers, provide the greatest transit-user benefits, and result in the fewest vehicle hours of delay. It will provide access to employment centers at Pearl Harbor Naval Base and Honolulu International Airport and will serve the Salt Lake neighborhood with connecting bus service. Of the three Build Alternatives addressed in the Draft EIS, the Airport Alternative will have slightly lower impacts to the natural and built environment. During the public comment period on the Draft EIS, the public overwhelmingly supported the Airport Alternative. Of the comments that specifically supported one of the alternatives, more than 75 percent were in support of the Airport Alternative.

The Project is expected to benefit Oahu residents by meeting the following purpose and need of the Project of: improving corridor mobility, travel reliability, access to planned development to support City policy to develop a second urban center, and transportation equity. The total cost of the Project, including finance charges, is $4.6 billion in 2009 dollars and $5.5 in inflated dollars. Of this amount, about $1.3 billion is a contingency to cover unforeseen cost increases. Chapter 6 of the Final EIS provides a cost and financial analysis of the Project. The Final EIS does not contain information about other City projects as they are not related to the Project.

Analysis of traffic impacts employs a travel demand forecasting model used by the Oahu Metropolitan Planning Organization (OahuMPO). The OahuMPO's existing model was reviewed, enhanced, recalibrated, and validated to be consistent with current FTA guidelines. The approach has proven to be effective in estimating traffic impacts in other cities. The model-generated analysis shows a reduction in total congestion by 18 percent in 2030 (measured in vehicles hours of delay) when comparing the Project to the No Build Alternative (Table 3-14 of the Final EIS). Traffic reductions will be seen on major roadways throughout the corridor and will be most pronounced in Aiea and Waipahu, in addition to the Ewa area (Tables 3-9 and 3-10 of the Final EIS). With the Project, transit ridership levels will be influenced by factors such as improved transit travel times in peak periods, as compared to the No Build Alternative.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

OAU R710/08-293446

12/29/08

TO: Dept of TRANS.
650 So. King St. 96813

Fr: Beatrice Tomikawa

Subj: RAIL Project

1. I'm completely AGAINST The RAIL Project.
2. You're Spending A Terrific amount to this project
3. NOT MANY will Ride the RAIL. Even the BUS today very few ride it.
4. When I'm Your town I see so many BUS "NOT in Service" — So who's going to RIDE the RAIL?

Beatrice Tomikawa

Ms. Beatrice Tomikawa
95-1059 Puiu St.
Mililani, HI 96789-3722

AR00003392

DEPARTMENT OF TRANSPORTATION SERVICES

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010 RT12/08-293446R

Ms. Beatrice Tomihama
95-1059 Eulu Street
Mililani, Hawaii 96789

Dear Ms. Tomihama:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

Your preference for the No Build Alternative has been noted. The No Build Alternative does not address the project needs or meet the purpose of the Project as established in Sections 1.7 and 1.8 of the EIS. While each of the alternatives discussed in the Draft EIS includes trade-offs between benefits and impacts, the Airport Alternative from East Kapolei to Ala Moana has been selected as the Preferred Alternative as described above. As compared to the alternatives discussed in the Draft EIS, the Airport Alternative will carry the most passengers, provide the greatest transit-user benefits, and result in the fewest vehicle hours of delay. It will provide access to employment centers at Pearl Harbor Naval Base and Honolulu International Airport and will serve the Salt Lake neighborhood with connecting bus service. Of the three Build Alternatives addressed in the Draft EIS, the Airport Alternative will have slightly less impacts to the natural and built environment analyzed in the Draft EIS. During the public comment period on the Draft EIS, the public overwhelmingly supported the Airport Alternative.

Of the comments that specifically supported one of the alternatives, more than 75 percent were in support of the Airport Alternative. For more information this selection is discussed in Section 2.4 of the Final EIS. Since publication of the Draft EIS, design has been advanced, further analysis has been completed, and information has been added in response to comments on the Draft EIS and agency coordination. The Final EIS discusses the process that was used to select the Preferred Alternative, how comments were considered in the decision-making process, impacts and mitigation commitments.

Next, your second comment has been noted.

To address your third comment, as identified in Section 3.2.1 of the Final EIS, transit ridership forecasts for rail and bus service are based on a travel demand forecasting model used by the Oahu Metropolitan Transportation Organization (OahuMPO) for the Oahu Regional Transportation Plan. The OahuMPO model is based on "best practices" for urban travel models in the U.S. The model is updated approximately every five years to reflect changes in land use, socioeconomic conditions, and transportation network improvements. The model is approved by the OahuMPO Technical Advisory Committee. As indicated in the Final EIS, this modeling approach has proven to be effective in estimating ridership levels in other areas such as Los Angeles County, Salt Lake City, and the Denver region in the last 10 years. The model is based on guidelines established by the FTA. The model is based upon a set of realistic input assumptions regarding land use and demographic changes between now and 2030 and expected transportation levels-of-service on both the highway and public transit system.

Regarding your last comment, as stated in Section 3.3.2 of the Final EIS, TheBus system serves more than 80 percent of Oahu's developed areas and has about 252,200 boardings on an average weekday. Honolulu has the fourth highest load factor for bus service in the U.S. It is a very well-used system and provides a good indication that ridership forecasts for the fixed guideway are reasonable. Buses that are not in service are either on their way to start a route or returning from a route. Such status is not related to how many people ride transit when in service.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
Creation Date :	11/25/2008
Creator Affiliation :	
First Name :	L.
Last Name :	Tomita
Business/Organization :	
Address :	94-870 Lumiauau St
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Apt./Suite No. :	A203
City :	Waipahu
State :	HI
Zip Code :	96797
Email :	tomits@kahala.net
Telephone :	
Telephone Extension :	
Add to Mailing List :	Email
Submission Method :	Website
Other Submission Method :	
Submission Date :	11/25/2008
Submission Content/Notes :	1. initial route: UH Manoa & Kalaeloa. extension: Ala Moana SC. don't see Ala Moana SC workers/shoppers at the H-1/H-2 merge at 5 am. 2. why the love affair with Salt Lake? wouldn't more people benefit with an airport route? regarding 1. & 2, above: thought the whole rail idea was to serve the greatest good. the greatest good don't live in Salt Lake. do your homework! 3. too much focus on initial cost. how much is it going to cost for upkeep? the C & C of HNL can't even fill potholes. how are we going to pay for rail maintenance?

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010 RT9/09-330867

L. Tomita
94-870 Lumiauau Street, A203
Waipahu, Hawaii 96797

Dear L. Tomita:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall indentify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

In response to your first bulleted comment, the connection of UH Manoa and Kalaeloa would require completion of the system between those points, which would include Ala Moana Center. The system must be connected to a maintenance and storage facility, which has considerable land requirements that cannot be met in the Primary Urban Center. The Ala Moana area is a major employment center. The extensions of the line to UH Manoa and Waikiki will also start from the Ala Moana terminus when funding becomes available. Those are also major generators of trips such as Ala Moana.

Regarding your second bullet point, your preference for the Airport Alternative has been noted. While each of the alternatives discussed in the Draft EIS includes trade-offs between benefits and impacts, the Airport Alternative from East Kapolei to Ala Moana has been selected as the Preferred Alternative as described above. As compared to the alternatives discussed in

the Draft EIS, the Airport Alternative will carry the most passengers, provide the greatest transit-user benefits, and result in the fewest vehicle hours of delay. It will provide access to employment centers at Pearl Harbor Naval Base and Honolulu International Airport and will serve the Salt Lake neighborhood with connecting bus service. Of the three Build Alternatives addressed in the Draft EIS, the Airport Alternative will have slightly less impacts to the natural and built environment analyzed in the Draft EIS. During the public comment period on the Draft EIS, the public overwhelmingly supported the Airport Alternative. Of the comments that specifically supported one of the alternatives, more than 75 percent were in support of the Airport Alternative. For more information this selection is discussed in Section 2.4 of the Final EIS. Since publication of the Draft EIS, design has been advanced, further analysis has been completed, and information has been added in response to comments on the Draft EIS and agency coordination. The Final EIS discusses the process that was used to select the Preferred Alternative, how comments were considered in the decision-making process, impacts and mitigation commitments.

Regarding your third bullet point, the details of the cost of maintenance for the guideway system are provided in Section 6.4 of the Final EIS. Operating and maintenance costs will be paid for from the same funding sources currently used for TheBus: Federal funding, fare revenues, and subsidies from the City's General and Highway Funds. Funding for guideway maintenance will be covered in the City's annual budgeting process and amounts to between 2 percent and 3 percent of the City's annual operating budget. Projected operating and maintenance costs for the transit system (the fixed guideway, TheBus, and TheHandi-Van) can be found in Figure 6-2 of the Final EIS.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Action Completed
Creation Date :	11/2/2008
Creator Affiliation :	
First Name :	Matthew
Last Name :	Toyama
Business/Organization :	
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Apt./Suite No. :	
City :	
State :	HI
Zip Code :	96822
Email :	Gensuke@hawaii.rr.com
Telephone :	
Telephone Extension :	
Add to Mailing List :	Email
Submission Method :	Website
Other Submission Method :	
Submission Date :	11/02/2008

Submission Content/Notes : Election Day is Coming up and I've taken my time to make my decision. Right now I'm very much against Rail Transit because, based on both Stop Rail and Support Rail advertisements, I believe that the people in charge of the project have no clue what they're really doing.

This mainly stems from the fact that the Support Rail advertisements don't address some of the more serious issues, such as space usage and environmental concerns. All the Support Rail advertisements (As well as their website) really say is "Anti-Rail Protesters are wrong because Rail technology works in Seattle".

After reviewing this site I've gotten a much clearer image of what the Rail project will be like. I approve of the idee of using elevated railways, that being the only practical way I believe it will work. However I am very concerned about how you plan on integrating more eco-friendly alternative energy sources into the project itself.

Many Advertisements claim that Rail will reduce our dependence on foreign oil because it will run on electricity, and claim that it will use solar, wind, and biofuel. However all sources I've been able to locate don't say HOW the alternative energy sources will be integrated.

As this is the case, I must assume that they will not infact be integrated and the rail system will have to rely on HECO who, as I understand it, still generate the majority of Hawaii's Electricity through traditional Oil Burning means. Am I wrong?

I'm also curious as to:
-Why you have not made the specifics about the Rail Technology being considered available to the public.
-How we can be sure that the government is going to promptly enact any promises they make.
-Why you are planning to break ground in 2009, possibly before you are approved to receive funding.
-Where the money is going to come from if construction begins in 2009 and we can only get government funding by 2011.

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010 RT8/09-330330

Mr. Matthew Toyama
gensuke@hawaii.rr.com

Dear Mr. Toyama:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

The public involvement materials used until November 2008 contained project-related information that was available at the time of publication. However, since the beginning of the Alternatives Analysis and environmental processes, many details regarding your concerns of space usage and environmental impacts were evaluated in the Draft and Final EIS.

The Final EIS (Section 4.11.3) indicates that the Project will reduce energy consumption by about 3 percent compared to the No Build Alternative. During Final Design, energy-efficient design and methodologies will be incorporated into the Maintenance and Storage Facility, the stations, and other structures where practical. The extent of photovoltaic and other energy-reduction and generation features could be included at that time. The Project will still rely heavily on Hawaiian Electric Company (HECO) for energy to power the system. As described in the Final EIS Section 4.11.3, HECO's planned electricity generation on Oahu will be sufficient to

support the Project with various upgrades. Please refer to Chapter 4 of the Final EIS for the analysis of environmental impacts.

Regarding your comment about transit vehicles, a specific vehicle has not been selected for the system. The RTD has established vehicle specifications that are summarized in Chapter 2 of the Final EIS. As noted in Chapter 2, the selected transit technology will be electrically powered, industry-standard steel wheel on steel rail powered from a third-rail system. The selected vehicle will be capable of a top speed greater than 50 mph. The vehicles could either be manually operated by a driver or fully automated (driverless).

Any commitments made in the Final EIS and Record of Decision become project requirements. These will be incorporated into the project specifications and City staff will be tasked with ensuring these commitments are carried out.

Lastly, local funding through a surcharge to the General Excise and Use Tax (GET) was approved in 2005. Construction of a project of this magnitude requires a substantial period of time to complete and the earlier that this Project is completed the earlier the benefits may be realized. In addition, inflation increases project costs with time, and the earlier that construction can be undertaken, the better that costs can be controlled. As discussed in Chapter 7 of the Final EIS, the Project is proceeding through the Federal project development process. Current indications are that the Project will be rated favorably to receive Federal funds.

The FTA and DTS appreciate your interest in the Project. The Final EIS has been issued in conjunction with the distribution of this letter. You may view the Final EIS on the Project website at www.honolulutransit.org. You may request a DVD of the Final EIS and additional content through the "Contact Us" tab on the website or by calling the Project hotline at 566-2299. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Record Date :	12/20/2008
First Name :	Paul
Last Name :	Tse
Business/Organization :	
Address :	155 N. Beretania St.
Apt./Suite No. :	202
City :	Honolulu
State :	HI
Zip Code :	96817
Email :	ptse189@yahoo.com
Telephone :	
Telephone Extension :	
Add to Mailing List :	Both
Submission Method :	Website
Submission Content/Notes :	I have several suggestions for the rail transit system. It's better to start the first phrase from downtown honolulu to Pearl CIty first. I heard that the rail system will be intergrated with TheBus , TheBoat. Hybrid buses will also be use in this project instead of diesel buses. The reason why is that the buses will reduce greenhouse gases.

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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HONOLULU, HAWAII 96813
Phone: (808) 768-8305 • Fax: (808) 768-4730 • Internet: www.honolulu.gov

MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010 RT9/09-322251

Mr. Paul Tse
155 North Beretania Street
Apartment 202
Honolulu, Hawaii 96817

Dear Mr. Tse:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

As described in Section 2.5.10, Project Phasing, and further in Section 8.6.9, Construction Phasing, in the Final EIS, to support phased opening, the first construction phase must be connected to a maintenance and storage facility, which requires considerable space. No location has been identified closer to Downtown with sufficient available space to construct a maintenance and storage facility. Therefore, construction will begin between East Kapolei and Leeward Community College. The Project will be constructed in phases to accomplish the following:

- *Match the anticipated schedule for right-of-way acquisition and utility relocations.*

- *Reduce the time that each area will experience traffic and community disturbances.*
- *Allow for multiple construction contracts with smaller contract size to promote more competitive bidding.*
- *Match the rate of construction to what can be maintained with local workforce and available financial resources.*
- *Balance expenditure of funds to minimize borrowing.*

The portion of the corridor in the Ewa direction of Pearl Highlands is less developed than the areas in the Koko Head direction. Right-of-way can be obtained more quickly at the west end of the Project; therefore, overall project construction can begin earlier, resulting in lower total construction costs. Construction is planned to continue uninterrupted in the Koko Head direction from Pearl Highlands to Aloha Stadium, Kalihi, and finally to Ala Moana Center.

As portions of the Project are completed, each will be opened incrementally so that system benefits, even if limited during the initial phases, will be realized prior to completion of construction of the entire Project.

The fixed guideway system will be integrated with other transit modes. Appendix D of the Final EIS provides information on future bus routes and frequencies with the Project. How those modes are fueled is independent of the fixed guideway system.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
Creation Date :	1/7/2009
Creator Affiliation :	
First Name :	Veronica
Last Name :	Tuia
Business/Organization :	Good Samaritan Church
Address :	P.O Box 31029
Alternative Preference :	
Apt./Suite No. :	
City :	Honolulu
State :	HI
Zip Code :	96820
Email :	
Telephone :	
Telephone Extension :	
Add to Mailing List :	Standard
Submission Method :	Website
Other Submission Method :	
Submission Date :	01/07/2009
Submission Content/Notes :	Can we start now? Thanks

DEPARTMENT OF TRANSPORTATION SERVICES

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

May 21, 2010

RT9/09-333550

Ms. Veronica Tuia
P.O. Box 31029
Honolulu, Hawaii 96820

Dear Ms. Tuia:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraph addresses comments regarding the above-referenced submittal:

While each of the alternatives includes trade-offs between benefits and impacts, the Airport Alternative from East Kapolei to Ala Moana Center has been selected as the Preferred Alternative. The identification of the Airport Alternative as the Preferred Alternative was made by the City to comply with FTA's NEPA regulations that state that the Final EIS should focus on the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative, public input on the Draft EIS, and City Council Resolution 08-261 identifying the Airport Alternative as the Project. The selection of the Airport Alternative is described in Chapter 2 of this Final EIS. The discussion of the alternatives considered is included in Chapter 2 of this Final EIS and the Alternatives Analysis. As discussed in Section 3.4.2 of this Final EIS, the Airport Alternative will carry the most passengers with 116,000 daily passengers and 282,500 daily trips in 2030, thereby resulting in the greatest transit-user benefits. The Airport Alternative will also result in the fewest vehicle miles traveled and vehicle

hours of delay, as well as provide access to major employment areas, including Honolulu International Airport, that will have substantially greater ridership than the other alternatives considered. The Project is proceeding as quickly as practical, as illustrated in the schedule presented in Chapter 2 of the Final EIS.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Issuance of the Record of Decision under NEPA and acceptance of the Final EIS by the Governor of the State of Hawaii are the next anticipated actions and will conclude the environmental review process for this Project.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

DC #42827-C
RECEIVED
DEC 29 2008
PB AMERICAS, INC.
HONOLULU, HAWAII

from Ralph Rosenberg Court Reporters

Richard Ubersax
Waimanalo
12/8/08

The purpose of the DEIS is to provide the City and County, the FTA, and the public with the information necessary to make an informed decision, based on a full and open analysis of costs, benefits, and environmental impacts of alternatives considered. However, it seems that in some respects, the DEIS is aimed at convincing the pubic and the FTA of the benefits of the Project, rather than inform the public.

One example is in the cost-effectiveness of the project. The FTA's cost-effectiveness index is a ratio formed by adding an alternative's annualized *capital cost* to its *year 2030 operating and maintenance cost*, and the total is divided by *user benefits*", in hours saved. The key criteria for determining the cost-effective index are annualized cost of the project, ridership estimates, and the time benefits realized by the riders.

Any proposed New Starts project receiving less than a "Medium" cost-effectiveness index rating will not be recommended for funding by the FTA. The threshold between a rating of "Medium" and "Medium-Low" is $22.99 per user benefit expressed in dollars per hour of user benefit.

In the Alternatives Analysis, the cost-effectiveness index for the 20-mile alignment from East Kapolei to Ala Moana Center is stated as $21.34; and for the full project from West Kapolei to UH Manoa with an extension to Waikiki as $27.05. Thus, the 20-mile segment meets the threshold of $22.99, but the full project does not.

City ordinance 07-001 recommended the North-South Road/Airport option as the preferred minimum operational segment (MOS) for several reasons, one of which being that the cost-effectiveness index of $22.56 is below FTA's threshold.

Now, in the DEIS, the cost-effectiveness index has markedly improved to a point that is significantly below the FTA threshold of $22.99: $17.53 for the Salt Lake Alternative, $17.78 for the Airport Alternative, and $22.86 for the combined Salt Lake/Airport Alternative. Information for the full project with extensions is conspicuously absent in the DEIS although it was available in the AA.

We know that the capital cost and O&M costs have not reduced, so that the only explanation is that the user benefits have increased significantly. If one digs further into the DEIS, you will find the following statement: "Research indicates that positive attributes (both perceived and real) are associated with the use of a fixed guideway system, which make the system more attractive than general bus transit. These benefits include such things as improved safety, security, visibility, ease of use, comfort, and reliability. These factors or attributes are not captured by the standard travel demand forecasting process. To account for these attributes in this user benefit analysis, FTA has approved an additional factor [redacted] of in-vehicle time. The

factor was incorporated for riders taking the fixed guideway only. A 5.5-minute savings of in-vehicle time was incorporated for riders taking feeder buses to the fixed guideway."

Basically what this indicates is that 14.5 minutes is subtracted from every guideway trip made, and 5.5 minutes from every feeder-bus trip to end up with the "time" benefit for guideway trips that is now artificially more favorable. Assuming ~90,000 fixed guideway trips each day, fed by ~63,000 bus trips, this fudge factor adds up to a 22,000-hour time credit for fixed guideway use and a 6,000-hour time credit for feeder-bus use ..... for a total credit of 28,000 hours each day of user benefit ...or over 5 million hours each year of "user benefit". Although the DEIS does not say so out rightly, this is probably a major factor in the much lower cost-effectiveness index.

Thus, it seems that the City and Parsons Brinkerhoff, with or without collusion by the FTA has decided to apply a new subjective measure to the determination of "user benefits", which is not incorporated in the transit models. The application of this change is never clearly explained in the DEIS nor any of the publicly available supporting references.

This issue and the exclusion of the complete project (MOS with all extensions) from the cost-effectiveness analysis need to be scrutinized thoroughly by the FTA.

DEPARTMENT OF TRANSPORTATION SERVICES

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010 RT10/09-335707

Mr. Richard W. Ubersax
41-1013 Laumilo Street
Waimanalo, Hawaii 96795

Dear Mr. Ubersax:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

The Draft EIS only reports estimates of cost-effectiveness for those Build Alternatives addressed in the document, namely three fixed-guideway alternatives that would extend from East Kapolei to Ala Moana Center. The Project has logical termini and independent utility from any extensions that may be constructed in the future. The future extensions to East Kapolei, Salt Lake Boulevard, Waikiki, and UH Manoa are discussed in the cumulative impacts sections of Chapters 3 and 4 of the Final EIS; however, the future extensions are not part of the Project. Thus, they are not required to be evaluated under Chapter 343 of the Hawaii Revised Statues and NEPA. Under NEPA, environmental analysis is only required when there is a proposed action by a Federal agency. Here, because the future extensions are not proposed for implementation at this time, they are not part of the Project studied in the Final EIS. It would be premature to undertake an environmental analysis of the extensions (beyond the cumulative impacts analysis) because they are not part of the proposed action to be taken by the City and

FTA. If the future extensions are proposed for implementation at some time in the future, environmental analysis of the extensions and appropriate alternatives will be undertaken at that time.

The cost-effectiveness calculation is closely scrutinized by FTA. The calculation itself is specified by the FTA according to the factors it considers representative of travel behavior from experience gained on many projects across the country. The analysis steps that led to the numbers in Chapter 7 of the Draft and Final EISs are defined by the FTA. Over the course of a refinement in the model application, there are many things that change. Many elements make up the user-benefit calculation. Some are related to travel time or cost savings; others are related to the overall improvement in transportation system performance that will be derived from the Project. User benefits, for example, could change if there is a change in ridership resulting from new information incorporated into the model. Cost-effectiveness for the other options evaluated did not rise to the level of the fixed guideway, despite their lower overall project costs. The incorporation of "non-included attributes" in the calculation of user benefits is fully consistent with FTA guidance.

The Final EIS meets the requirements of NEPA and the FTA. The public has been continuously informed about progress on the Project since it started over three years ago. The analysis completed shows a significant difference in the ability of the various alternatives tested to meet the various objectives set forth in the Final EIS. The fixed guideway was by far the most responsive to the identified Purpose and Need. These assessments were completed using the procedures specified by the FTA.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Richard W. Ubersax, Ph.D.
41-1013 Laumilo Street
Waimanalo, HI 96795
UBERSAX@GMAIL.COM
(808) 259-6895

February 5, 2009

To: Mr. Wayne Y. Yoshioka
Department of Transportation Services
City and County of Honolulu
650 South King Street, 3rd Floor
Honolulu, HI 96813

CC: Mr. Ted Matley
FTA Region IX
201 Mission Street, Suite 1650
San Francisco, CA 94105

RE: General Comments on DEIS

Dear Mr. Yoshioka:

I am by no means an expert on transportation planning and engineering, but as an R&D director (now retired) in a multibillion-dollar high-tech company, do have considerable experience in evaluating complex and risky technology projects, including evaluation of alternative technologies and approaches, assessing technical feasibility of proposed approaches, and evaluating outcome probabilities and economic risks. Surprisingly, the principles and methodologies for evaluating the Honolulu rail transit project are very similar. In both cases an informed decision to proceed (or not) is based on reliable input (existing and projected) and objective analysis based on experience, good judgment, and benchmarking against comparable projects. After initiation of approved projects, similar methodologies are applied to measure progress as new information (results) becomes available.

Based on my analysis of the DEIS and supporting documentation, and researching project history and benchmark information, I have serious reservations about whether the City has made an objective evaluation of all of the alternatives against the key criteria, but rather has conducted the process and presented data and analysis to achieve a predetermined result. The magnitude of the cost of the project and the long-term implications that the wrong choice will have on the aesthetic, environmental, economic, and social welfare of the community is cause to pause and reassess the validity of the whole process.

Each Administration bas had its own "pet" transit program (just look at the history over the last 20 years), which has resulted in vacillation and delay in moving forward. This has created chaos in the selection process and confusion among the people. The current Administration (and Council) terminated the past Administration's BRT project within days of attaining office and instantly the current program was elevated to the top of the agenda.

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I think we all recognize the need for an efficient and cost-effective transit system for the island of Oahu, but we must resist emotional or predetermined decisions and political agendas to dominate the process – rather than a pristinely objective process.

The following examples and discussion are meant to show where I believe there are flaws in the process, data, interpretation of the data, and arguments in favor of the case. There are numerous other examples I could use, but for lack of time and brevity, I have focused on the ones presented. Please take this discourse constructively, even though it may appear highly critical.

Please contact me with any questions.

Respectfully yonrs,

Richard W. Ubersax

Richard W. Ubersax

P.S.: I have also sent you an electronic copy in .pdf format.

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The purpose of the DEIS is to provide the City and County of Honolulu, the FTA, and the public with information necessary to make an informed decision, based on a full and open analysis of costs, benefits, and environmental impacts of all of the alternatives considered. This project is probably one of the most complex and costly projects ever undertaken in the state of Hawaii; so it is critical for the City administrators and the public to have sufficient and objective information to make informed judgments about the various aspects of the project, distill the information to assess the merits of potential alternatives, and determine how it will affect the island and their personal lives. However, it seems that in some respects, the DEIS is aimed at convincing the pubic (and the FTA) of the benefits of the "Project", rather than to objectively inform about both the benefits and downsides.

The DEIS and the accompanying Technical Reports certainly contain a plethora of information, but there are many areas where important information is missing or difficult to find, where significant changes have been made from the Alternatives Analysis without sufficient explanation, where the validity of data is in serious doubt, and where decisions and choices have been made and rationalized with incredulous explanation. As a result, the credibility of the entire document and process is compromised.

The Administration, FTA, and Oahu taxpayers should be wary of spending over $5 billion on a Project that has been selected on the basis bias, questionable data and judgment, where the risks have not been fully evaluated, and where significant impacts have been summarily dismissed.

In its present form, the DEIS does not meet the criteria set forth in the first sentence of this page. In fact, the City should step back, assess whether they have objectively met all of the criteria and requirements of NEPA and SAFTEA-LU, make the appropriate modifications to ensure compliance, inform the public of their intentions and plan, and then move forward. It is better to take the time now rather than regret unintended consequences in the future.

The following discussion is meant to provide examples where – based on my interpretation and analysis of the information provided in the DEIS, supporting references, and other documentation developed throughout the process – I find that incomplete or ambiguous data has been presented, inappropriate conclusions have been drawn, and/or questionable decisions made.

A. Selection and Evaluation of Alternatives

The DEIS defines the "Project" as a fixed guideway transit system from East Kapolei to Ala Moana Center. Planned extensions are anticipated to West Kapolei, UH Manoa, and Waikiki. The Locally Preferred Alternative selected by City Council includes the Project and the planned extensions. The DEIS considers the following "four" alternatives:

1) No-Build Alternative and
2) Build between East Kapolei and Ala Moana Center, with three variations:
   a) Salt Lake Alternative
   b) Airport Alternative
   c) Salt Lake + Airport Alternative combined

Actually, these distill to two alternatives – No Build and Build. The three "Build" alternatives described in the DEIS are so similar in terms of environmental impact, benefits accrued, and economics that they cannot be truly classified as distinctly different alternatives; to the skeptic, it appears that they were structured as distinct alternatives in the DEIS to satisfy the legal

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requirement of due diligence for the selection and evaluation among all reasonable alternatives. If they were truly distinct, City Council would never have been able to make the switch from the Salt Lake Alternative to the Airport Alternative by a simple Council vote without considerable public input.

It is clearly stated in 40CFR1502.14:

The Environmental Impact statement *"should present the environmental impacts of the proposal and the alternatives in comparative form, thus sharply defining the issues and providing a clear basis for choice among options by the decision maker and the public. In this section agencies shall:*

(a) Rigorously explore and objectively evaluate all reosonable alternatives, and for alternatives that were eliminated from detailed study, briefly discuss the reasons for their having been eliminated.

(b) Devote substantial treatment to each alternative considered in detail including the proposed action so that reviewers may evaluate their comparative merits.

(c) Include reasonable alternatives not within the jurisdiction of the lead agency.

(d) Include the alternative of no action.

(e) Identify the agency's preferred alternative or alternatives, if one or more exists, in the draft statement and identify such alternative in the final statement unless another law prohibits the expression of such a preference.

(f) Include appropriote mitigation measures not already included in the proposed action or alternatives."

It is clear that since reincarnation of rail transit in 2005, there has been bias towards steel-on-steel rail as the preferred transit mode; other potentially viable alternatives have not been considered seriously, or they have been systematically eliminated during preliminary evaluation. The Locally Preferred Alternative (LPA) from Kapolei to UH Manoa with an extension to Waikiki was selected because the end-points make sense and the route passes through the highly populated east-west corridor where traffic relief is badly needed. When it was realized that the cost of this route was significantly higher than the City could afford, the expedient solution was simply to shorten the route, with the intent to complete the LPA at a later time. Other alternatives, which could be as equally effective – and perhaps lower-cost – appear to have been summarily dismissed without comprehensive, objective evaluation. The explanation of why alternatives were not feasible was based on flawed analysis and on the argument that they did not meet FTA or State criteria for funding. In reality, there are alternative federal funding sources, and the State could easily amend HB 1309 to accommodate other Alternatives. It is clear that the political will was – and continues to be – focused on rail (note restrictions in HB 1309 for counties with population of greater than 500,000), and thus has limited the scope of selection of Alternatives.

The current design of the fixed guideway will cause irreparable disruption of views through and across its path; it would ruin the aesthetics neighborhoods and important historical sites. These visual impacts would be impossible to mitigate. The noise of trains passing every 1.5 to 5 minutes will be physically and emotionally distressing, especially during night-time hours along tight corridors. The FTA guidelines are for exterior noise, and do not consider the open window and door lifestyle of our residents. Many of the receptor sites evaluated in the DEIS would shift

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from "no impact" to "moderate impact", or from "moderate impact" to "severe impact" if the criteria were adjusted for our lifestyle. The assessment in the DEIS downplays the severity of noise impacts by not considering L_{max} for instantaneous noise as recommended by FTA guidelines. At present, there are no City or State statutes that regulate noise from mobile sources. Hawaii HAR 11-46 *[not HAR 11-16]* regulates stationary noise sources. It is imperative that such statutes be legislated to protect the peaceful environment to which we are accustomed.

All things considered, we need to step back and objectively evaluate alternatives that could be more cost-effective than elevated rail and could bring lesser environmental impact along its path. The following are examples that should be considered:

a) A more environmentally-friendly rail system. The greatest concerns with an elevated guideway, steel-on-steel rail system is the high cost of the elevated guideway (~3-4 times that of at-grade systems) and significant visual, aesthetic, and noise impacts along the guideway. A potential solution would be to build the system at grade through rural areas where possible for lower cost, and through sensitive urban areas (where noise, visual, and aesthetic impacts are problematical), to build at-grade or underground. Fixed Guideway Alternative 4a (Kapolei Parkway/Kamokila Boulevard/Salt Lake Boulevard/King Street/Hotel Street/Alakea Street/Kapi'olani Boulevard/UH Manoa) from the *Alternatives Screening Memo, October 24, 2006* apparently attempted to do this but was eliminated from consideration late in the evaluation process. It (or optimizations thereof) should be revisited, and perhaps with shortened routes (e.g., an MOS from East Kapolei to Ala Moana Center) for greater affordability.

   This alternative would be expected to have lesser noise and visual impacts east of Iwilei Road since it descends to grade on Hotel Street and goes underground at Alakea Street to Waimanu Street. The cost of this alternative is expected to be less than or comparable to the DEIS Salt Lake Alternative.

b) A bus rapid transit (BRT) system similar to that described in the *"Primary Corridor Transportation Project"* FEIS, *July 2003* and *"Honolulu BRT Project Evaluation", January 2006.* The system began operation in November 2004, but was discontinued in June 2005, supposedly due to poor performance (and coincidental with change in City administration).

   A conclusion of the 2006 "Evaluation" report is: *"Greater benefits in terms of improving ridership, customer satisfaction, capital and operating cost effectiveness, transit supportive land use, and environmental quality may be possible with more significant investments in dedicated running ways, advanced vehicles, stations, ITS elements, and fare collection."* BRT has been proven successful in many U.S. and foreign cities, and could be successful in Honolulu if given the chance. This alternative should be revived and given the necessary planning and engineering resources to make an objective evaluation.

c) A BRT / Managed Lane Alternative (MLA) hybrid, similar to the EZ-Way proposal by Professor Panos Prevedouros and Councilwoman Ann Kobayashi during her mayoral campaign. A major deficiency in the evaluation of the MLA in the Alternatives Analysis is that the design developed by the City did not provide sufficient egress points along the route to enable uncongested flow at exit ramps. This was a major reason for its dismissal from further consideration. However, it is anticipated that with improved design to

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overcome this deficiency, the EZ-Way proposal would ascend to become a viable alternative.

All of the above alternatives would be expected to lessen the environmental impacts that a fixed-guideway elevated system will bring to the highly populated urban center of Honolulu.

Finally on the point of objectivity versus political will: the City Administration, City Council, and entire selection process have lost credibility over the Salt Lake Alternative versus Airport Alternative debacle. The initial selection of the Salt Lake Alternative was politically motivated; the change to the Airport Alternative was proposed the week after the election. The net result is that the whole process is now tainted. Let's take the appropriate steps to restore that credibility by giving all potentially viable alternatives an objective assessment. Yes, it will delay the project; but we "can not afford not to do it".

B. Transit User Benefits and Cost Effectiveness of the Project

a) User Benefits:

This is an area where major change has been made in the DEIS versus the AA without sufficient explanation. To most readers of the DEIS, the change probably went unnoticed because of how the DEIS is structured.

"Transit user benefits represent the amount of transit travel-time savings a user would experience with a given transit alternative compared to the No Build Alternative."(DEIS p. 3-36).

Table 3-19 lists the transit-time savings for various transit markets for the three Build Alternatives compared to the No Build Alternative. These represent future projections calculated by the travel demand-forecasting model. The model predicts that the time saved each day for users of the Project will be approximately 50,000 hours per day or 15-16 million hours per year.

During the period between the AA and DEIS, the FTA allowed an additional benefit to transit users – again expressed in terms of time saved (Federal Register Vol. 72, No. 106. June 4, 2007):

*"FTA adopts as final its proposal to allow project sponsors that seek to introduce a new transit mode to an area to claim credits (implemented through what is commonly called a mode specific constant) for the user benefits caused by attributes of that mode **beyond the travel time** and cost measures currently available in the local travel model. FTA will continue to work closely with sponsors of projects that have calibrated mode-specific constants to ensure that they are using constants that are generally consistent with the methods and values permitted for sponsors of projects which are new to an area."*

"FTA will assign credits for characteristics in three categories: (1) Guideway-like characteristics (equivalent to a maximum of eight minutes of travel time savings); (2) span of good service (up to three minutes); and (3) passenger amenities (up to four minutes). Further, FTA will define a discount of up to 20 percent on the weight applied to time spent on the transit vehicle. These credits and discount are applied to the calculation of user benefits only; ridership forecasts will not be affected."

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This was superficially disclosed in the DEIS on p. 3-36:

"Research indicates that positive attributes (both perceived and real) are associated with the use of a fixed guideway system, which make the system more attractive than general bus transit. These benefits include such things as improved safety, security, visibility, ease of use, comfort, and reliability. These factors or attributes are not captured by the standard travel demand forecasting process. To account for these attributes in this user benefit analysis, FTA has approved an additional factor equivalent to a 14.5 -minute savings of in-vehicle time. The factor was incorporated for riders taking the fixed guideway only. A 5.5 -minute savings of in-vehicle time was incorporated for riders taking feeder buses to the fixed guideway."

Basically what this indicates is that 14.5 minutes is credited to every guideway trip made, and 5.5 minutes to every feeder-bus trip, to end up with an inflated "time" benefit for guideway trips. These "savings" are then multiplied by ridership estimates. Assuming ~90,000 fixed guideway trips each day [Table 3-18], fed by ~63,000 bus trips, this additional factor adds up to a 22,000-hour time credit for fixed guideway use and a 6,000-hour time credit for feeder-bus use – for a **total credit of 28,000 hours each day** of user benefit – or over 8.6 million hours each year. The total user benefit has now increased 56% to approximately 78,000 hours each day. This total amount is nowhere disclosed in the DEIS or Technical Reports. At first glance, this might appear as an innocuous adjustment; but it becomes significant in the calculation of the "Cost-Effectiveness Index" – one of the most significant criteria in the FDA's rating of the Project versus competing projects.

The mode-specific constants are intended to be applied to account for attributes (such as safety, security, reliability, ease of use, etc.) above and beyond the time-savings predicted in the local travel model. However, these factors are subjective and arbitrary, unless they can be validated versus other operating transit systems. The derivation of the values in the DEIS are not explained at all, so appear to be strictly arbitrary values, or values negotiated with FTA. A full and open analysis is certainly missing, and needs to be included: What data supports the claim that trains are safer than other modes? Users of the Project will need to make more transfers than with the No-Build Alternative; does this really improve ease of use?

The Washington Metropolitan Area Transit Authority reports that the incidence of crime is approximately three times greater for train transport than bus:

Crime rate per Million Riders	2004	2005	2006	2007	2008
Rail	1.76	1.65	1.69	2.17	2.76
Parking Lot	4.28	3.55	3.97	4.38	4.40
Bus	0.60	0.68	0.79	0.79	0.95

Reference: http://www.wmata.com/about_metro/transit_police/mtpd_crime_stats03.cfm

Thus, if one assumes a similar trend in Honolulu, the modal-specific constant adjustment for "safety" should be zero or negative. The point is that the modal-specific constants use in the analysis need to be thoroughly explained in the DEIS.

b) Cost-Effectiveness Index:

According to the DEIS (p. 7-9): *"Cost-effectiveness is one of the key criteria that FTA uses to evaluate projects proposed for Section 5309 New Starts funding. The FTA's cost effectiveness*

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index is a ratio formed by adding an alternative's annualized capital cost to its year 2030 operating and maintenance cost, and the total is divided by user benefits", in hours saved. Further "The cost-effectiveness indices for the Build Alternatives compared to the baseline fall within the "medium" range established by FTA for its New Starts ratings, which, along with other considerations, is currently required to qualify for New Starts funding." The key criteria for determining the cost-effective index are annualized cost of the project, ridership estimates, and the time benefits realized by the riders.

Any proposed New Starts project receiving less than a "Medium" cost-effectiveness index rating will not be recommended for funding by the FTA. The threshold between a rating of "Medium" and "Medium-Low" is $22.99 per user benefit expressed in dollars per hour of user benefit.

According to the Alternatives Analysis, the cost-effectiveness index for the 20-mile alignment from East Kapolei to Ala Moana Center is $21.34; and for the full project from West Kapolei to UH Manoa with an extension to Waikiki as $27.05. Thus, the full project would not meet the threshold requirement of $22.99, but the 20-mile alignment would.

City ordinance 07-001 defined a Locally Preferred Alternative for a fixed guideway transit system and authorized development of a minimum operable segment (MOS). The North-South Road/Airport option was recommended by Council in the ordinance for several reasons, one of which being that the cost-effectiveness index of $22.56 was below FTA's threshold for receiving the necessary "Medium" or better cost-effectiveness rating needed to qualify for FTA's recommendation for funding. Note again that the threshold is $22.99.

Now, in the DEIS, **the cost-effectiveness index has markedly improved** to a point that is significantly below the FTA threshold of $22.99: **$17.53** for the Salt Lake Alternative, **$17.78** for the Airport Alternative, and **$22.86** for the combined Salt Lake/Airport Alternative (DEIS Table 7-7). Information for the full project with extensions is not available in the DEIS.

We know that the capital cost and O&M costs have not reduced (perhaps have increased slightly), so that the only explanation is that the user benefits have increased significantly. As discussed above, the user benefits have increased significantly because of application of the subjective "mode-specific" time adjustment to the actual time saved. Thus, if one adds the *annualized capital cost* to its year *2030 operating and maintenance costs*, and divides the total by the user benefits (in hours saved), the result is a number that is significantly less than reported in the AA; e.g. $21.34 in the AA (20-mile alignment) versus $17.53 in the DEIS (Salt Lake Alternative).

The application of this change is never clearly explained in the DEIS nor any of the supporting references. In fact, the level of detail in the DEIS on the Cost-effectiveness Index is restricted to Table 7-7. This certainly does not meet the requirement of a full and open analysis so that the public is able to make an informed decision. To the contrary, the City has disguised and concealed this information so that it is difficult to comprehend how Cost-effectiveness Index was calculated.

There is a disclaimer to the validity of the Cost-effectiveness Index calculations in the DEIS as follows:

"*FTA is currently reviewing the estimates made for ridership and user benefits, operating and maintenance costs, and capital costs for the Build Alternatives. If these results hold up through*

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subsequent phases of project development, along with other FTA considerations, the Project would be in the competitive range for funding consideration." (DEIS p. 7-9)

It is imperative that this whole area be scrutinized by the FTA, so that the merits of the project are accurately determined prior to issuance of an ROD.

It is also noteworthy that the City has not included any discussion of the Cost-effectiveness Index of the Full Project as was done in the AA. One can surmise that it would be significantly higher than for the Project, and was intentionally excluded since it still might exceed the FTA threshold of $22.99 (my estimation is that it would be between $22 and $24).

One final note on Cost-effectiveness Index: Since the Honolulu Project utilizes an elevated guideway along the entire length it would be expected to cost 3 to 4 times as much as an "at-grade" system. Operations and Maintenance costs are expected to be higher than an at-grade system because of the higher infrastructure cost. User benefits (time saved) are expected to be the same as any rail transit system of similar size. Thus, with the significantly higher cost of the elevated system, it is difficult to rationalize how the Honolulu Project could have a Cost-effectiveness Index that is competitive with other projects on the FTA docket.

The discussion in the DEIS needs be expanded to elaborate the derivation of User Benefits data and Cost-effectiveness Index – in detail at least as extensive as in the Alternatives Analysis. The dramatic reduction in the Cost-effectiveness Index reported in the DEIS versus in the AA needs comprehensive explanation, and how this change will influence the FTA's evaluation of the Project. The FTA should explain how this project could be competitive with other projects with respect to this important rating criterion, considering its extremely high capital cost.

C. <u>Validity of Model Predictions and Interpretation</u>:

Many of the conclusions drawn throughout the evaluation process are based on predictive transit and traffic models commonly used for such evaluations. They are commonly used by most large cities for transit planning, and are usually tailored for the specific city or area. It is impossible for the layman to understand the operation of these models and their inputs and outputs (e.g., screenline analysis, vehicle miles traveled, vehicle hours traveled, vehicle hours of delay, transit ridership, transit time saved, etc), so we must rely on what is reported by the users of the models.

In the DEIS, these model predictions are reported as the gospel truth; the results are not reported as ranges, but as specific values; no probabilities are assigned concerning the confidence of the values reported. It is unreasonable that we should be expected to accept these predictions at face value. At a minimum, the DEIS should at least disclose that there is uncertainty around predictive model outputs, and report a <u>range</u> of probable output values that reflects the range of reasonable inputs into the model, and assign a probability of confidence to the values or ranges reported. Within the DEIS and supporting references, the discussion around confidence level or uncertainty around the values is conspicuously absent.

The disparity between model predictions and actual transit ridership validates the need to report model predictions as ranges or to assign confidence probabilities. For the majority of rail transit systems put into operation within the last 30 years, actual ridership has not met ridership predictions; a few have exceeded prediction. For many of these cases, actual ridership might fall within a predicted range , and thus give greater credibility to the entire process.

The "*Honolulu High-Capacity Transit Corridor Project Alternatives Analysis Travel Demand Forecasting Results Report*" (RTD 2008t, October 2008) addresses changes made in the Travel Demand model, but does not address validation of the model. In fact the Report is elusive in describing details. For example in the section on Adjustment of the Mode Choice Model, it says *"The mode choice model was re-calibrated as part of the Draft EIS process; however, the details of it are not discussed in this report"* (p. 1-3). Regarding calibration and validation of the model, the Report states: *"The 2005 model was calibrated as a result of all of the changes discussed. Calibration Target Values were assigned and applied to the model. Details regarding the calibration and validation process, including the specific Calibration Target Values, can be found in the Honolulu High-Capacity Transit Corridor Project Travel Forecasting Methodology Report (RTD 2006)"* (p. 1-5).

There are several examples from the DEIS that prompt one to question the validity of these models or whether the data is being reported accurately:

a) Ridership Model:

DEIS Table 3-17 shows Fixed Guideway ridership for the three Alternatives. It seems inconsistent that ridership for the "Airport & Salt Lake" Alternative (92,710 daily boardings) is less than for the "Air Port" Alternative (95,310). One would certainly think that the Airport & Salt Lake Alternative, with one additional station than the Airport Alternative, would have greater ridership than the Airport Alternative alone. Perhaps there is good rationale for this, but it is certainly not disclosed in the DEIS.

It is also curious that the data in Tables 4-21, 4-22, and 4-23 of the *Travel Demand Forecasting Results Report* (RTD 2008t) are significantly greater than reported in the DEIS (although the data in Appendix A of the Forecasting Results Report (RTD 2008t) are the same).

	DEIS Table 3-17	RTD 2008t Tables 4-21, 22, 23	RTD 2008t Appendix A
Salt Lake:	87,570	102,174	87,571
Airport:	95,310	120,231	95,305
SL & AP	92,710	108,179	92,707

Perhaps there are explanations (that are not obvious to the reader) for this "curious" data, but they are not discussed in the DEIS or Technical report (RTD 2008t).

Side note: As a point of reporting accuracy, there is obviously a gross error in Table 4-11 of the *Travel Demand Forecasting Results Report* (total AM peak hour volume of 93,410 appears to be off by factor of ~10). Perhaps the wrong spreadsheet was inserted.

b) Calculation and Interpretation of Congestion Data:

The *Oahu MPO* Travel Demand Forecasting Model is the primary tool for predicting future traffic patterns and transportation-related effects. The tables below show data extracted from the DEIS for Vehicle Miles Traveled per day (VMT/d), Vehicle Hours Traveled per day (VHT/d), and Vehicle Hours of Delay per day (VHD/d). A primary measure of traffic congestion in the DEIS (and AA) is based on "Vehicle Hours of Delay" (VHD) for each

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transportation scenario. It is not clear from the DEIS how VHD is calculated in the model; nonetheless, if we take the data at face value, the following can be concluded:

- In 2030, if the Project were not built, VHD would be 43.2% greater than in 2007 (even with planned roadway improvements); e.g., "congestion" would be 43.2% greater.
- In the build scenarios, congestion in 2030 would be 10.8-13.5% greater than today
- In the build scenarios, congestion in 2030 would be 20.8-22.6% less than the 2030 No Build scenario.

From DEIS Tables 3-9 and 3-14

	VMT/d	VHT/d	VHD/d	% Change from 2007 VMT/d	VHT/d	VHD/d
2007	11,581,000	334,000	74,000			
2030 no-Build	13,583,000	415,000	106,000	17.3%	24.3%	43.2%
2030 Salt Lake	13,096,000	385,000	84,000	13.1%	15.3%	13.5%
2030 Airport	13,086,000	385,000	82,000	13.0%	15.3%	10.8%
2030 Both	13,103,000	386,000	83,000	13.1%	15.6%	12.2%

	% Change from 2030 no build		
2030 Salt Lake	-3.6%	-7.2%	-20.8%
2030 Airport	-3.7%	-7.2%	-22.6%
2030 Both	-3.5%	-7.0%	-21.7%

Similar data is presented in the AA (below).

From AA Table 3-10

	VMT/d	VHT/d	VHD/d	% change from 2005 VMT/d	VHT/d	VHD/d
2005	11,206,000	305,000	57,000			
2030 no-Build	13,971,000	395,000	82,000	24.7%	29.5%	43.9%
2030 20-Mile	13,539,000	376,000	73,500	20.8%	23.3%	28.9%
2030 MLA Rev	14,034,000	397,000	82,500	25.2%	30.1%	44.7%
2030 MLA* Rev	14,050,000	387,000	72,500	25.4%	26.9%	27.2%

	% Change from No Build VMT/d	VHT/d	VHD/d
2030 20-Mile	-3.1%	-4.8%	-10.4%
2030 MLA Reverse	+0.5%	+0.5%	+0.6%
2030 MLA* Rev	0.6%	-2.0%	-11.6%

**MLA reversible case with H-1 zipper in place (estimated)*

Comparing the DEIS data with the AA data, the following differences stand out:

- VHD for the 2030 No Build case in the DEIS is 29% greater than the 2030 No Build case in the AA (106,000/82000); although VHD for the 2030 Build cases are only ~13% greater than for the 2030 20-mile alternative in the AA (~83,000/73,500).

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- Existing condition (2005 or 2007) VHD is 30% greater in the DEIS than in the AA, although VMT is only 3% greater. One would think that the increase in VHD would be much smaller for a 3% increase in cars on the road (VMT).

Ultimately the Build Alternatives provide congestion relief (improvement in VHD) when compared with the No Build Alternatives of 10.4% in the AA and ~21-23% in the DEIS.....or to put it in the Administration's words: "a 100% improvement in congestion." Lacking good explanation in the DEIS, this sudden improvement is difficult to rationalize or understand. The impression that was left with the public is that the benefits of the Build Alternatives are much greater than previously anticipated – just what the Administration intended. Nothing was said about the accuracy or calibration of the models as a possible explanation.

The underlying uncertainty is whether the travel models are providing reliable data. Predictive models calculate future conditions based on the model's algorithms (mathematical manipulations via equations) and input data (including from other models). Algorithms can be optimized to try to better suit local conditions. Overall, getting a predictive model to make accurate predictions (validated) is an extremely difficult undertaking. If the assumptions that go into the model are not validated, the accuracy of the output can be in question. An obvious validation point lies in the comparison of 2005 traffic data (actually measured existing condition) with that predicted for 2007. Unfortunately, I do not believe that "actual" 2007 data has been gathered, and thus, validation is not possible.

To demonstrate the point that it is an easy matter to achieve an entirely different outcome from small, and explainable differences in input data, I have added an "new" alternative into the AA Alternatives evaluation: a Managed Lane Alternative with the reversible lane option, but using the H-1 zipper lane as an added lane (H-1 zipper was not used for the reversible MLA option). I have assumed a reduction in daily delay of 10,000 hours; which is equivalent to a 2.4-minute savings for each of the 250,000 cars that would benefit from this option. This option is included at the bottom of the above table (in gray font). Isn't it amazing that this option reduces congestion 11.6% versus 10.4% for the 20-mile AA Build Alternative! If I had access to the model, I could just as easily have "optimized" inputs and algorithms to get a similar result.

The main point in this example is that even small differences in model predictions can influence data used in making key decisions. In this case, the MLA Alternative looks considerably better than originally portrayed in the AA. Is the congestion relief quoted in the DEIS really 100% greater than in the AA? Certainly not; it is only 12% better (23% minus 11%).....or maybe not even that.....I really do not know because the accuracy of the model has not been validated!

The magnitude of this Project requires that the City demonstrate through substantive assessment and analysis that all of the information used in the evaluation and selection of alternatives is accurate and can be validated within reasonable confidence levels.

D. Project Risks and Uncertainties

Section 6.5 of the DEIS (Risks and Uncertainties) is designed to explain the financial "risks" associated with the Project; but in reality, it is more a compilation of "uncertainties" rather than a comprehensive analysis of the risks and potential consequences of these uncertainties, and a plan to mitigate their impacts on the Project. As a result, the reader (and thus general public) is

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unaware of the impact these financial uncertainties could have on the Project and on the financial stability of the City.

With respect to FTA's *"Risk Analysis Methodologies and Procedures"*, June 2004, it appears that the City has completed the first two "Prepare" and "Identify" steps of the risk analysis process, but has neglected to "Quantify" or "Assess" the magnitude of the risks, or established a plan to "Mitigate" the risks). Rather, the City has reserved a large "contingency" in the Project budget to cover the risks and uncertainties. The FTA discourages this approach, and suggests that a comprehensive risk analysis is a tool for better communication and more cost-effective project management, and thus minimizes the need for large contingencies.

The risk assessment should anticipate the following events and a plan to mitigate their consequences:

- GET surcharge fund plus New Starts funding is not sufficient to meet Project capital costs (including interest costs). Right now there is no assurance that the GET revenues will meet the anticipated $4.054 Billion, or New Starts funding will meet expectations. The DEIS states that additional funding would be possible to fund the capital needs of the Project, but does not specifically identify the source except by reference to "complemented by local assistance" (Section 6.2.2). Does this mean local taxes (State and City) will increase to cover the gap? Will the GET be extended beyond 2022? Will funds be transferred from the General and Highway funds (at the expense of other infrastructure projects)? Will the project be stopped short of Ala Moana Center? How will the Extensions be financed?

  The City needs to be more specific in defining sources of additional funds, and if in the form of General Revenue Bonds or "borrowed" from other City funds, how they will be repaid.

- Fare revenues are not sufficient to cover 27 to 33% of O&M costs or total transit subsidies exceed 15% of General and Highway fund revenues. What will be the source of additional funds?

- Construction delays or stoppage by discovery of Archaeological and Cultural Resources; construction impediments caused by concerned groups. Virtually every major construction project on Oahu has been either stopped or significantly delayed because of anticipated or actual discovery of Archaeological Resources. There will be no exception for this project. The City should expect construction delays of uncertain length. The impact of this scenario needs to be addressed in the financial Risk Analysis.

- Operating risks. In addition to those mentioned in the DEIS there is a risk that speeds will have to be reduced or headways extended for a variety of reasons: e.g., longer stops needed at stations, too noisy in sensitive residential neighborhoods. This will have a definite impact on cost. The financial implications of these situations on operating costs and/or cost of mitigation need to be assessed.

A major concern of many residents is the impact that cost over-runs (either capital or operational) will have on quality-of-life programs for the benefit of the general public, such as: parks, recreational facilities, road quality. This concern extends to the impact that higher taxes will have on disposable income, and thus quality-of-life on a daily basis for each individual and family.

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FTA guidelines indicate that a comprehensive Risk Analysis has the potential to increase efficiency and reduce project costs. It is imperative the risks associated with this Project be addressed in much greater detail in the SEIS or FEIS.

E. Economic Impact

The DEIS must meet the requirements of both Federal and State EIS standards. It is clear from Hawaii Revised Statutes Chapter 343 that the DEIS should disclose *"the environmental effects of a proposed action, effects of a proposed action on the economic welfare, social welfare, and cultural practices of the community and State, effects of the economic activities arising out of the proposed action, measures proposed to minimize adverse effects, and alternatives to the action and their environmental effects."*

Section 4.2 of the DEIS (*Economic Activity*) assesses the impact of the Project on specific economic elements in the study corridor, but fails to consider the more global economic impacts on the *economic welfare and social welfare* of the community (island of Oahu) either in this section or in cumulative effects. It covers the impact on employment, and the positive and negative impacts the Project will have on property values and tax revenues for properties near the guideway. But it fails to address the Project's impact on property taxes for all property owners on Oahu.

It also fails to assess the impact that capital costs of the Project will have on the long-term *economic and social welfare* of the people, or on other infrastructure projects (e.g., roads, sewers, parks) and social programs. Financing of the Project capital cost via the GET surcharge costs each individual on Oahu ~$125-150 each year (~$500-600 per family) and will continue for 16 years through 2022. In total, each family will contribute ~$20K (YOE $s) towards the capital cost of the project. The 0.5% GET surcharge has already impacted the lives of many residents, and could impact many more because of the economic downturn in the local and national economy. The GET is a regressive tax and thus impacts the economic (and social) welfare of lower-income families more than higher-income families. There is no mention of these effects in the DEIS or supporting references.

Any shortfalls in Operating and Maintenance costs are *"assumed to be funded through City subsidies from its General and Highway Funds"* (DEIS p. 6-10). Today, Operating and Maintenance subsidies represent ~10% of the County's General Fund (which is 70% funded by property tax revenues) and are expected to increase to 14-15% in 2018 (DEIS Fig. 6.3). This translates to an increase of ~$40M to $50M (2008 $), or ~$44 to $55 for each resident each year (~$170 to 220 per family), which will be have to be funded by an increase in property tax of ~5 to 6% (despite the Administration's denial that there will be a need to increase property taxes for this purpose).

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Note to correct misstatement in DEIS: To rationalize the curve in Figure 6-3 (resulting in a concomitant lower O&M cost as % of General Fund since 2002), it is stated in the DEIS, p.6-7, that *"City revenues have increased, as a result of large increases in real estate values on O'ahu ...."*. This is a statement that the City has used repeatedly to rationalize why real estate taxes (revenues) have increased dramatically over the past five years. The corollary to this statement must also apply: *City revenues will decrease as a result in decreases in real estate value.* But this corollary will prove to be incorrect because of City statute. In reality, real estate revenues have increased because of increases in the City's operating budget (and thus need for additional revenues) proposed by the Administration and approved by City Council; real property taxes, according to the City's ROH Sec. 8-11.1, are determined by the product of real property values times the tax rate – and not real property values alone. In fact if real property values decreased during the same period, statute requires that the tax rate increase to provide sufficient revenue to support the budget.

The City's share of project cost of $4.2 billion (YOE) will be irretrievably lost from other projects (e.g., sewer repair and maintenance, sewage facility upgrades, H-power waste-to-energy expansion, landfill expansion/relocation, road repair and maintenance, etc.), and the community may not have the resources to fund both the Project and these other necessary projects. There should be no dispute that the Project will have a significant impact on the economic and social welfare of residents of Oahu. It is critical that the EIS evaluate these impacts.

F. Omission of Extensions from detailed discussion in the DEIS

The thesis on the first page of this discourse is amplified by the omission of the three "planned extensions" (to West Kapolei, University of Hawaii at Manoa, and Waikiki) from detailed analysis and discussion in the DEIS. The extensions are covered superficially as "cumulative" effects; even though the latter two extensions have greater potential impact on the environment (and cost) than the defined "Project" (Minimum Operable Segment). The Locally Preferred Alternative should not have been segmented into the "Project" plus three extensions for this EIS, but evaluated in its entirety. To cover the extensions as "cumulative" effectives does injustice to the process and the public. The use of the term "First Project" to describe the "Project" indicates full intention to complete the Locally Preferred Alternative at some point. Admittedly, inclusion of the extensions might change the overall conclusions of the DEIS – which is all the more reason for including them.

G. Air Quality (Section 4.8)

This section compares "regional [Oahu] mobile source pollutant burdens" for the three Build Alternates and the No Build.

"Air quality effects predicted to result from the Project's operation are based on the anticipated vehicle miles traveled (VMT) and average network speed for each alternative." (p. 4-94)

"If the electricity used to operate any one of the Build Alternatives is generated by combustion, this may produce additional emissions. However, these emissions would be offset in whole or part by the reductions generated by reduced VMT. Furthermore, power plant emissions may be much more easily controlled than emissions from individual automobiles." (p. 4-95)

These two statements indicate that pollution burdens of the four Alternatives have been calculated based solely on VMT, and that pollution caused by generation of electricity used by the Project is not included. The most audacious and ludicrous statement is that *"power plant*

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emissions may be much more easily controlled than emissions from individual automobiles." At the present time there is no cost-effective process to do this, and none is foreseen in the immediate future.

To the best of my knowledge, electricity from the project will come from HECO; 90% of whose energy comes from combustion of fossil fuels and trash. It is unlikely that this situation will change significantly in the future. If one considers this additional pollution source, the pollution generated by all four Alternatives is essentially the same, making the following statement false:

"It is anticipated that the Project would reduce regional pollutant emissions by between 3.2 to 4.0 percent (varying by Build Alternative) compared to the No Build Alternative (Table 4-12)".(p. 4-95)

In addition, the analysis does not reflect or even consider the impact of improved automobile efficiency (which is guaranteed to happen).

H. Downtown Station Location (a curious situation)

The Dillingham Transportation Building is one of the most architecturally and historically significant buildings in downtown Honolulu; it is on the Hawaii Register of Historic Places. Yet, the current plan is to locate the entrance to the Downtown Station in full view of (and partially encroaching into) the building's courtyard. Several alternatives have been considered, but all have been dismissed for a variety of reasons.

However, one of the alternatives requires comment. The "Fort Street" location would move the whole station in the Ewa direction to Fort Street with an entrance at either Walker Park or the Fort Street Mall on the mauka side of Nimitz and an entrance in Irwin Memorial Park on the makai side. A modification to this plan would be to place the mauka entrance *Koko Head* side of Walker Park on private TMK parcel 21013006. This alternative would completely avoid affecting the Dillingham Transportation Building and Walker Park. What is most interesting in the DEIS are the explanations on why this location is not feasible:

"However, this station location would require a 250-foot curve radius to maintain a minimum distance between the edge of the station platform and end of curve. A 250-foot curve radius is substantially less than the Project's design criteria of 500 feet. Such a tight radius would necessitate reducing speeds to 5 to 10 miles per hour, which is substantially below the Project's design speed of 30 miles per hour. This would result in increased travel time and o substantial decrease in user benefits." (p. 5-34) First, the current design radius is 600 feet, and with only slight changes in alignment on Nimitz Avenue, a radius of 500 feet could be maintained. Secondly, this curve is right at the entrance/exit to the station, and all trains should be going less than 10 miles per hour at that point.

"Additionally, placing an entrance makai of Nimitz Highway would impact Section-4(f)- protected Irwin Memorial Park, and a mauka entrance would block either the Fort Street Mall or Walker Park, another Section 4(f) resource." As discussed above locating the entrance on private property on the mauka side of Nimitz eliminates the 4(f) concern there, and even though location of the makai entrance in Irwin Park represents a 4(f) impact, it has less historical and architectural significance than locating it next to the Dillingham Transportation Building.

Thus, this location seems to be pretty attractive. One wonders what the real reason is for locating the station in front of the Dillingham Transportation Building with an entrance in the adjacent courtyard.

AR00003427

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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June 11, 2010 RT10/09-337486

Mr. Richard W. Ubersax
41-1013 Laumilo Street
Waimanalo, Hawaii 96795

Dear Mr. Ubersax:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

A. Selection and Evaluation of Alternatives

The Build Alternatives included in the Draft EIS are all similar, in that they have been developed through FTA's Project Development Process and meet the Purpose and Need for the Project. As described in Chapter 2 of the Final EIS, the process, as outlined in FTA guidance, has been followed to evaluate a broad range of alternatives and identify the Preferred Alternative. During the Draft EIS scoping process, the public and agencies were requested to comment on the alternatives that resulted from the Alternatives Analysis and were proposed to be carried forward into the Draft EIS and to identify any other reasonable alternatives that would meet Purpose and Need at lower cost or with fewer environmental impacts. No such alternatives were identified, aside for

the ones included in the Draft EIS. The Draft EIS precisely addresses the requirements of 40 CFR § 1502.14.

For further information, Chapter 2 of the Final EIS summarizes the alternatives screening and selection process. Beginning in the fall of 2005, an initial screening process considered alternatives identified through previous transit studies, a field review of the study corridor, an analysis of current population and employment data for the study corridor, a literature review of technology modes, ongoing work completed as part of the Oahu Regional Transportation Plan 2030 (ORTP) prepared by the Oahu Metropolitan Planning Organization (OahuMPO) (OahuMPO 2007), and public and agency comments received during the formal Alternatives Analysis scoping process.

The screening process is documented in the Honolulu High-Capacity Transit Corridor Project Alternatives Screening Memorandum (DTS 2006a). Three scoping meetings were held during the screening process in December 2005, which included a presentation of initial alternatives to the public, interested agencies, and officials to receive comments on the Purpose and Need, alternatives, and scope of the Alternatives Analysis. Refinements were made to the alternatives based on the public input during scoping.

After completion of screening in the winter of 2006, the following alternatives were studied in the Alternatives Analysis: No Build Alternative, Transportation System Management (TSM) Alternative, Managed Lane Alternative, and the Fixed Guideway Alternative. After review of the Alternatives Analysis Report and consideration of public comments, the City Council identified a fixed guideway transit system extending from Kapolei to UH Manoa with a connection to Waikiki as the Locally Preferred Alternative. This identification, which eliminated the TSM and Managed Lane Alternatives from further consideration, became Ordinance 07-001 on January 6, 2007. The NEPA process considered a range of alternatives that was consistent with the identified Locally Preferred Alternative. As discussed in Section 2.2, there were no alternatives that had not been previously studied and eliminated for good cause that would satisfy the Purpose and Need at less cost, with greater effectiveness, or less environmental or community impact.

Regarding your comments on visual impacts, the assessment of visual effect due to the Project as described in Section 4.8.3 of the Final EIS considers changes to the visual landscape and viewer responses to those changes. This includes the existing development along the Project alignment. Within the Project corridor the environment changes from rural at the Wai'anae end of the corridor to dense high-rise development at the Koko Head end.

As part of the design process, the City has developed design principles, which are identified in the Honolulu High-Capacity Transit Corridor Project Compendium of Design Criteria (RTD 2009m) that will be implemented in final design to minimize visual effects of the Project. For example, guideway materials and surface textures will be selected in accordance with generally accepted architectural principles to achieve effective integration between the guideway and its surrounding environment. Landscape

and streetscape improvements will mitigate potential visual impacts, primarily for street-level views.

Other measures to address visual impacts of the Project are being developed through the station design and planning process. The initial station area plans and design guidelines were first developed with coordination between DTS and the Department of Planning and Permitting (DPP). The next level of transit station design focuses on integrating individual neighborhood characteristics of the communities served by the stations.

The following mitigation framework will be included in the Project to minimize negative visual effects and enhance the visual and aesthetic opportunities that it creates:

- *Develop and apply design guidelines that will establish a consistent design framework for the Project with consideration of local context.*
- *Coordinate the project design with City TOD planning and DPP.*
- *Consult with the communities surrounding each station for input on station design elements.*
- *Consider specific sites for landscaping and trees during the final design phase when plans for new plantings will be prepared by a landscape architect. Landscape and streetscape improvements will serve to mitigate potential visual impacts.*

Section 4.8.3 of the Final EIS, Design Principles and Mitigation includes information related to the mitigation framework described above. Specifically architecture and landscape design criteria include guidelines regarding site design, materials and finishes, and lighting, which apply to stations, station areas, and the guideway.

The Project's effects on historic sites are discussed in Section 4.16 of the Final EIS. Under Section 106, the City has complied the requirements to identify and address any impacts to historic properties. These have been further reviewed through an extensive consultation process including private and public historic and agency interests such as the State Historic Preservation Division, National Park Service, Advisory Council on Historic Preservation, etc. in addition to the Federal Transit Administration..

Regarding your concerns about noise, according to the FTA Manual (Section 2.5.7), "The Lmax descriptor is not recommended for transit noise impact assessment..." Separately described maximum noise levels are not necessary to the calculation of the Day Night Average Sound Level (Ldn), which is the prescribed metric (sound descriptor) to be used in an FTA noise impact analysis for residential uses or the Equivalent Sound Level (Leq), which is used for sensitive uses without a "sleeping" component. The maximum sound level is included in the Sound Exposure Level descriptor of rail transit noise that was used to calculate future project operational Ldn

and Leq noise levels. The information provided in Appendices E and F of the FTA Guidelines may be used to calculate the Lmax if desired.

a) The Alternatives Screening Memorandum (DTS 2006a) recognized the visually sensitive areas in Kakaako and Downtown Honolulu, including the Chinatown, Hawaii Capital, and Thomas Square/Honolulu Academy of Arts Special District. To minimize impacts on historic resources, visual aesthetics, and surface traffic, the screening process considered 15 combinations of tunnel, at-grade, or elevated alignments between Iwilei and Ward Avenue. Five different alignments through Downtown Honolulu were advanced for further analysis in the Alternatives Analysis, including an at-grade portion along Hotel Street, a tunnel under King Street, and elevated guideways along Nimitz Highway and Queen Street (Figure 2-4).

The Alternatives Analysis Report (DTS 2006b) evaluated the alignment alternatives based on transportation and overall benefits, environmental and social impacts, and cost considerations. The report found that an at-grade alignment along Hotel Street would require the acquisition of more parcels and could potentially affect more burial sites than any of the other alternatives considered. The alignment with at-grade operation Downtown and a tunnel under King Street, was not selected because of the environmental effects, such as impacts to cultural resources, reduction of street capacity, and property acquisition requirements of the at-grade and tunnel sections, which would cost an additional $300 million.

The Project's purpose is "to provide high-capacity rapid transit" in the congested east-west travel corridor (see Section 1.7 of the Final EIS). The need for the Project includes improving corridor transit mobility and reliability. The at-grade alignment would not meet the Project's Purpose and Need because it could not satisfy the mobility and reliability objectives of the Project (see bullets below). Some of the technical considerations associated with an at-grade versus elevated alignment through Downtown Honolulu include the following:

- ***System Capacity, Speed, and Reliability**—The short, 200-foot (or less) blocks in Downtown Honolulu would permanently limit the system to two-car trains to prevent stopped trains from blocking vehicular traffic on cross-streets. Under ideal operational circumstances, the capacity of an at-grade system could reach 4,000 passengers per hour per direction, assuming optimistic five minute headways. Based on travel forecasts, the Project should support approximately 8,000 passengers in the peak hour by 2030. Moreover, the Project can be readily expanded to carry over 25,000 in each direction by reducing the interval between trains (headway) to 90 seconds during the peak period. To reach a comparable system capacity, speed, and reliability, an at-grade alignment would require a fenced, segregated right-of-way that would eliminate all obstacles to the train's passage, such as vehicular, pedestrian, or bicycle crossings. Even with transit signal priority, the at-grade speeds would be slower and less reliable than an elevated guideway. An at-grade system would travel at slower speeds due to the*

shorter blocks, tight and short radius curves in places within the constrained and congested Downtown street network, the need to obey traffic regulations (e.g., traffic signals), and potential conflicts with other at-grade activity, including cars, bicyclists, and pedestrians. These effects mean longer travel times and far less reliability than a fully grade-separated system. None of these factors affects an elevated rail system. The elevated rail can travel at its own speed any time of the day regardless of weather, traffic, or the need to let cross traffic proceed at intersections.

- ***Mixed-Traffic Conflicts***— *The Project will run at three minute headways. However, three-minute headways with an at-grade system would prevent effective coordination of traffic signals in the delicately balanced signal network in downtown Honolulu. A disruption of traffic signal cycle coordination every three minutes would severely affect traffic flow and capacity of cross-streets. Furthermore, there would be no option to increase the capacity of the at-grade rail system by reducing the headway to 90 seconds, which would only exacerbate the signalization problem. An at-grade system would require removal of two or more existing traffic lanes on affected streets. This effect is significant and would exacerbate congestion. Congestion would not be isolated to the streets that cross the at-grade alignment but, instead, would spread throughout Downtown. The Final EIS shows that the Project's impact on traffic will be isolated and minimal with the elevated rail, and, in fact will reduce system-wide traffic delay by 18 percent compared to the No Build Alternative (Table 3-14 in the Final EIS). The elevated guideway will require no removal of existing through travel lanes, while providing a reliable travel alternative. When traffic slows, or even stops due to congestion or incidents, the elevated rail transit will continue to operate without delay or interruption.*

An at-grade light rail system with continuous tracks in-street would create major impediments to turning movements, many of which would have to be closed to eliminate a crash hazard. Even where turning movements are designed to be accommodated, at-grade systems experience potential collision problems. In addition, mixing at-grade fixed guideway vehicles with cars, bicyclists, and pedestrians presents a much higher potential for conflicts compared to grade-separated conditions. Where pedestrian and automobiles cross the tracks in the street network, particularly in areas of high activity (e.g., station areas or intersections), there is a risk of collisions involving trains that does not exist with an elevated system. There is evidence of crashes between trains and cars and trains and pedestrians on other at-grade systems throughout the country (e.g., Phoenix, Houston, LA). This potential would be high in the Chinatown and Downtown neighborhoods, where the number of pedestrians is high and the aging population presents a particular risk.

- ***Construction Impacts***—*Constructing an at-grade rail system could have more effects than an elevated system in a number of ways. The wider and continuous footprint of an at-grade rail system compared to an elevated rail system (which touches the ground only at discrete column foundations, power*

substations, and station accessways) increases the potential of utility conflicts and impacts to sensitive cultural resources. In addition, the extra roadway lanes utilized by an at-grade system would result in increased congestion or require that additional businesses or homes be taken to widen the roadway through Downtown. Additionally, the duration of short-term construction impacts to the community and environment with an at-grade system would be considerably greater than with an elevated system. Because of differing construction techniques, more lanes would need to be continuously closed for at-grade construction and the closures would last longer than with elevated construction. This would result in a greater disruption to business and residential access, prolonged exposure to construction noise, and traffic impacts.

Because it is not feasible for an at-grade system through Downtown to move passengers rapidly and reliably without significant detrimental effects on other transportation system elements (e.g., the highway and pedestrian systems, safety, reliability, etc.), an at-grade system would have a negative system-wide impact that would reduce ridership throughout the system. The at-grade system would not meet the Project's Purpose and Need and, therefore, does not require further analysis.

b) Bus-based transit was evaluated during the Alternatives Analysis in two forms. The Transportation System Management (TSM) Alternative evaluated buses operating within the current system with minor system upgrades. The Managed Lane Alternative considered construction of a semi-exclusive guideway. As described in Chapter 2 of the Final EIS, neither of these alternatives was as effective at meeting the goals of the Project as is the Fixed Guideway Alternative. Furthermore, the fixed guideway relies on the bus system to support its operation, so there is significant consideration of bus in the Project. The performance of any bus-only system, even a BRT-based bus system, cannot approach the performance of the Project because it will continue to be exposed to the vagaries on daily congestion.

c) In "Chapter 2 – Alternatives Considered" of the Alternatives Analysis Report, November 2007, as well as in "Chapter 2 – Alternatives Considered" of the Final EIS, two options were considered for the Managed Lane Alternative: Two-direction and Reversible. This alternative would have provided a two-lane elevated toll facility between Waipahu and Downtown Honolulu, with variable pricing strategies to maintain free-flow speeds for transit and high-occupancy vehicles (HOVs).

The Two-direction Option would have served express buses operating in both directions during the entire day. To maintain free-flow speeds in the Two-direction Option, it may have been necessary to charge tolls to manage the number of HOVs using the facility. For the Reversible Option, three-person HOVs would have been allowed to use the facility for free, while single-occupant and two-person HOVs would have had to pay a toll. Of the two options studied, the Reversible Option was found be preferable.

As also discussed in Chapter 2 of the Final EIS, transit reliability would not have been improved except for express bus service operation in the managed lanes. While this alternative would have slightly reduced congestion on parallel highways, system-wide traffic congestion would have been similar to the No Build Alternative as a result of increased traffic on arterials trying to access the facility. Total islandwide vehicle hours of delay (VHD) would have increased with the Managed Lane Alternative compared to the No Build Alternative, indicating an increase in systemwide congestion (see Table 2-2 of Final EIS).

The Alternatives Analysis did address the Managed Lane Alternative in detail, including ramps at key locations. It did not perform as well as the fixed guideway and was, as a consequence, eliminated from further consideration. There is a trade-off between, the number of access points and the performance of the facility. More ramps means improved accessibility from more locations, but it can have a detrimental effect on traffic flow compared to the longer stretches of unimpeded operation. More ramps also significantly adds to the cost of the facility, which was not covered in the EZWay concept. Each ramp requires about 1000 feet (including transitions) for safe access to the exit and the equivalent for an on-ramp merging move. That means about 2000 additional feet of structure at least 12 feet wider than the mainline width at each ramp location. In addition, there is the effect of the ramps on properties in the communities in which they are placed. The only certain effect of additional ramps is a higher project cost for the added ramps compared to the Managed Lane Alternative as well as access for more vehicles would likely mean higher tolls to maintain free-flow operation. Tolls needed to be about $6.40 using the configuration in the Alternatives Analysis.

While each of the alternatives discussed in the Draft EIS includes trade-offs between benefits and impacts, the Airport Alternative from East Kapolei to Ala Moana has been identified as the Preferred Alternative as described above. Compared to the other alternatives discussed in the Draft EIS, the Airport Alternative will carry more passengers, provide the greatest transit-user benefits, and result in the fewest vehicle hours of delay. It will provide access to employment centers at Pearl Harbor Naval Base and Honolulu International Airport and will serve the Salt Lake neighborhood with connecting bus service. Of the three Build Alternatives addressed in the Draft EIS, the Airport Alternative will have slightly lower impacts to the natural and built environment. During the public comment period on the Draft EIS, the public overwhelmingly supported the Airport Alternative. Of the comments that specifically supported one of the alternatives, more than 75 percent were in support of the Airport Alternative.

The Alternatives Analysis phase, which as noted earlier, preceded the EIS process, is documented in Chapter 2 of the Final EIS. It evaluated a range of modal and general alignment alternatives, in terms of their costs, benefits, and impacts. The scoping process for the Alternatives Analysis involved a presentation of the viable alternatives to the public and interested public agencies and officials to receive comments on the Purpose and Need, alternatives, and

scope of the analysis. Scoping for the EIS followed the FTA process that provides for a culling of alternatives studied in the EIS through an Alternatives Analysis. The scoping process initiated for the Alternatives Analysis included a variety of highway, bus and fixed guideway options for consideration. During the later scoping effort for the EIS, the public was requested to propose alternatives that would satisfy the purpose and need at less cost or with greater effectiveness, less environmental or community impact and to propose alternatives that were not previously studied and eliminated for good cause. The only alternative that emerged that met these criteria was a fixed-guideway alternative following several alternative alignments. All reasonable alternatives that emerged from these processes were ultimately evaluated in the Draft and Final EISs.

Since publication of the Draft EIS, design has been advanced, further analysis has been completed, and information has been added in response to comments on the Draft EIS and agency coordination. The Final EIS discusses the process that was used to select the Preferred Alternative, how comments were considered in the decision-making process, impacts, and mitigation commitments.

The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the FTA's NEPA regulations that state that the Final EIS should focus on the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative, public input on the Draft EIS, and City Council Resolution 08-261 identifying the Airport Alternative as the Project.

B. Transit-User Benefits and Cost-Effectiveness of the Project

a) User Benefits - User benefit information is discussed in Addendum 01 to the Travel Demand Forecasting Results Report and Travel Forecasting Results and Uncertainties Report, available on the project website (www.honolulutransit.org). The values used in the development of travel demand information and user benefits are not arbitrary or negotiated. FTA approves them based on evidence derived from systems in operation throughout the country for systems comparable to the type being developed for Honolulu. The analysis steps that led to the numbers in Chapter 7 of the Draft and Final EISs are defined by the FTA. Over the course of refinement in the model application, many things change. Many elements comprise the user-benefit calculation. Some are related to travel time or cost savings; others are related to the overall improvement in transportation-system performance derived from the Project. The user benefits, for example, could change if there is a change in ridership resulting from new information incorporated into the model. Cost-effectiveness for the other options evaluated did not rise to the level of the fixed guideway despite their lower overall project costs. The incorporation of "non-included attributes" in the calculation of user benefits is fully consistent with FTA guidance.

The question of safety is presented in Section 2.5.4 of the Final EIS as a benefit of the planned system and is corroborated by Bureau of Transportation Statistics (BTS) data that show the vast majority of rail-related collisions occur at grade crossings. (There are no grade crossings in the proposed system.) The convenience and ease of use of the fixed guideway is related to visibility (it is easy to find), understandability of travel options (the guideway connects origins and destinations in a single line), minimal headways (no waiting), travel comfort (smoother acceleration or deceleration than typical buses), and reduced travel time.

As stated in Chapter 3 of the Final EIS, with the Project, the rate of transfers will be higher than under the No Build Alternative because of changes in local bus service to maximize access to the fixed guideway system. However, because of the high frequency of the fixed guideway service (three-minute headways between trains during peak periods), riders transferring from buses to the fixed guideway will experience minimal wait times. Riders transferring from the guideway service to buses will benefit from improved frequencies on existing bus routes serving stations. In addition, several new routes with high frequencies will be provided as feeders to the guideway system. Since these routes will primarily operate in residential areas, they will provide greater reliability versus routes operating along congested arterials. The travel demand forecasting model includes a time penalty for transfers. With these characteristics in place, the transit system with the Project would still have ridership levels 44 percent higher than the No Build Alternative. While people typically try to minimize transfers on any trip, the more fundamental criterion for making a trip decision is how long the trip takes. Rail will offer people a shorter overall trip time compared to other options, even with the transfers, as noted in Figure 3-7 of the Final EIS.

As discussed in Chapter 2 of the Final EIS, the design of stations and public areas will apply Crime Prevention through Environmental Design principles to minimize the incidence of crime. These measures have proven effective with other systems.

b) Cost-Effectiveness Index - Extensions of the fixed guideway are not part of the Preferred Alternative in the Final EIS. Cost-effectiveness consists primarily of calculating the benefit derived by users of the system in terms of time saved and cost as required by the FTA. The FTA specifies how these factors are to be used and how they must be reported to arrive at the cost-effectiveness index that will be reported for the Project. The same procedure is used for all projects reviewed by the FTA.

The cost effectiveness index (CEI) is a measure of the project's ability to meet FTA qualifications for Federal funding. The CEI compares the benefits that accrue to users as a result of the fixed guideway system being in place compared to the annualized costs (operating and capital) of the Project. The changes in the CEI are the result of more comprehensive development of both costs and user benefits and review by the FTA. Since the Alternatives Analysis, ridership

projections for the system have increased while the costs are comparatively the same.

As indicated in Table 7-7 of the Draft EIS, the Airport Alternative has a CEI of $17.78/hour. This is well below the $24.99/hour level currently required by FTA for a project to be cost-effective. Ridership and cost estimates are based on the best information available and have been developed consistent with FTA guidance and under FTA scrutiny. Even at lower ridership levels or higher costs, the Project would still qualify under FTA's CEI criterion.

Since the Draft EIS was published, the travel demand model has been refined by adding an updated air passenger model (which forecasts travel in the corridor related to passengers arriving or departing at Honolulu International Airport), defining more realistic drive access modes to project stations (driving alone or carpooling), and recognizing a more robust off-peak non-home-based direct-demand element (trips that do not begin or end at home) based on travel surveys in Honolulu. The ridership and user-benefit forecasts presented in the Final EIS have been reviewed and approved by the FTA. The cost-effectiveness index of the Project, as shown in Table 7-8 of the Final EIS, is $16.24/hour.

An elevated, fully automated transit system has lower operating and maintenance costs compared to an at-grade system operated by drivers. User benefits are higher because the performance of the elevated system is substantially higher than an at-grade system. This has been evidenced by grade-separated systems throughout the U.S.

The cost-effectiveness of the full LPA in not germane to the Project as it is not part of the project for which finding is being requested. At a future time, when the planned extensions are considered, new information about costs will be developed and evaluated, including a cost-effectiveness index of that project.

C. Modal Predictions

All model applications must conform to the requirements imposed on such work by the FTA. The FTA reviews, comments, and ultimately approves the model forecasts, including ridership numbers, to be used in all analyses. The FTA understands that an element of risk exists in model-generated travel forecasts. The FTA establishes the required practice and the ongoing review procedures with that in mind. The reports prepared as a result of the process discuss the risk elements and the steps taken to minimize them in the use of the numbers resulting from the application of the model. While ranges are not part of the FTA's current requirements, uncertainty analysis conducted for the Project show that the limits for ridership are between 105,000 and 130,000 riders a day, bracketing the official forecast of 116,000 riders a day used for all calculations. Chapter 3 in the Final EIS has been revised and now discusses the uncertainty analysis conducted for the Project and the anticipated limits for guideway ridership. The model has been validated and calibrated against the on-board survey conducted in 2005 and traffic ground counts taken in 2005, 2007 and 2008. Validation

and calibration are discussed in the Model Development, Calibration, and Validation Report, available on the project website (www.honolulutransit.org).

a) Ridership Model - As stated in Section 3.4.2 of the Draft EIS, "service frequency would be lower on the Airport & Salt Lake Alternative where the two lines are parallel, so slightly fewer fixed guideway boardings are projected for this alternative." For the analysis, the operation of the system is assumed to "split" the train trips between the Airport alignment and the Salt Lake alignment in the Airport & Salt Lake Alternative. As a result, headways on the parallel portions of the track will be approximately twice as long as headways on the other parts of the track (East Kapolei to Aloha Stadium and Middle Street to Ala Moana Center). This maintains the overall frequency of the system. In effect, the system would approximately average the number of trips between the two branches. Hence, the number of passengers should be between the Airport and the Salt Lake levels, as noted in Chapter 3.

Mahalo for bringing your next points to our attention. This error did not have any effect on the information presented in the Draft or Final EISs. Table 4-11 has been corrected in the Addendum 01 to the Travel Demand Forecasting Results Report.

b) Calculation and Interpretation of Congestion Data - The travel demand model used in the analyses for the Alternatives Analysis and the Draft and Final EISs was calibrated and validated based on the latest information available at the time. There are revisions that result from land use policy changes, demographic trends, and travel behavior, among others. For example, the model was recalibrated and validated after the Alternatives Analysis to incorporate information collected from surveys of bus users. It also incorporated changes in land use information throughout the corridor. The model will be updated periodically and the changes will be reflected in documents prepared at different times. The results are still the best information available and the basis for comparing the options under consideration. This is consistent with requirements imposed by the FTA which evaluates travel demand models very closely to avoid unreasonable forecasts. The model shows that a small decrease in cars can cause dramatic decreases in delay.

Validation of the travel forecasting model was done using 2005 traffic data and transit ridership information. This information is presented in the Model Development, Calibration, and Validation Report available on the project website (www.honolulutransit.org). Any increase or decrease in results is generated by the model in response to external variables such as land use data and travel information. The Managed Lane Alternative was analyzed in the Alternatives Analysis using the same tool used to analyze the fixed guideway and did not produce comparatively favorable results. As a consequence, it was eliminated from further consideration. The issue with the alternative proposed in the comment letter is that the time savings was "assumed". In other words, it was exogenously developed. In the travel demand model, that number is developed

internally in the model based on the network and socio-economic data inputs. The model does not "select" a time savings to arrive at an particular outcome. As stated above, the same approach was used for all alternatives studied throughout the project development process.

D. Project Risks and Uncertainties

The FTA specifies contingencies based on the stage of a project. Contingencies increase before Preliminary Engineering and decrease as contract documents are prepared based on Final Design. FTA has performed an independent risk analysis on the Project's cost estimates and found them within the appropriate risk range for this stage of the Project. Further evaluations of risk will be completed before the project receives final federal approval.

Section 6.3 of the Final EIS describes the funding sources anticipated to be used to pay for the capital costs of the Project and the City's overall public transportation system. Capital costs of the Project, including finance charges, are expected to be fully paid for by a combination of FTA Section 5309 New Starts Funds and FTA Section 5307 Funds from the Federal government and the Count General Excise and Use Tax (GET) surcharge levied from 2007 through 2022.

In addition, Section 6.4 of the Final EIS describes the funding sources to pay for ongoing operating and maintenance costs associated with maintaining the resulting transit system in a state of good repair. Operating and maintenance costs will be paid for from the same sources currently used for TheBus: Federal funding, fare revenues, and subsidies from the City's General and Highway Funds.

The capital plan for the Project is presented in Section 6.3 of the Final EIS and includes a description of the amount of funding anticipated from various sources. This section also describes risks and uncertainties associated with these funding assumptions. It is worth noting that the amount to be derived from the GET Surcharge in the Final EIS is $3.5 billion to reflect the effect of the slower economy.

Regarding fare cost recovery, it is the City Council's current policy to maintain fare cost recovery at a level between 27 and 33 percent of total system operating costs. If costs rise, policy provides for an increase in fares, which has been implemented in the past.

Your letter also addresses concerns about encountering iwi kupuna (Hawaiian burials). Section 4.16 of the Final EIS notes the likelihood of encountering iwi kupuna during construction. The City is working closely with the Oahu Island Burial Council to develop a plan to sample the corridor far in advance of construction to allow more time to resolve any questions or concerns that may arise as a result of finding burial remains along the route. This will also allow time to take appropriate action in keeping with affected lineal or cultural descendants wishes and State law.

The operating risks are incorporated in the operations planning work being done for the Project. Assumptions used in developing the plans have been reviewed by FTA third-party experts to ensure consistency with other guideway systems' operating practices.

FTA imposes strict guidelines for estimating costs to prevent concerns, such as the potential overruns mentioned in the comment. Cost estimates are thoroughly scrutinized by various FTA third party representatives, and risks and uncertainties are considered in developing financial plans for the Project. Chapter 6 of the Final EIS discusses this, along with other financial information.

The financial elements of the Final EIS are based on the August 2009 Financial Plan which is a more advanced level of analysis than was available in the Draft EIS.

E. Economic Impact

Beyond collection of property taxes that fund City operations, for which the City develops rates on an annual basis and part of which will fund transit services, there is no anticipated impact to property taxes for Oahu residents. Fixed guideway operation costs will represent between 2 and 3 percent of the City's annual operating budget.

The GET surcharge that funds the capital costs of the Project is a dedicated revenue source that the City Council adopted to pay for a priority concern of the community. Each of the other long-term issues mentioned in the comment will be addressed by the Council in an appropriate manner. Your other comments about the GET surcharge are noted but do not pertain to the project alternatives or effects. As indicated above and in Section 6.4 of the Final EIS, the operating and maintenance costs for the fixed guideway represent between 2 and 3 percent of the City's operating budget.

For further information on economic effects, Section 4.3 of the Final EIS addresses economic impacts, and Section 4.7 of the Final EIS discusses social welfare.

F. Extensions

The Project has logical termini and independent utility from any extensions that may be constructed in the future. The future extensions to East Kapolei, Salt Lake Boulevard, Waikiki, and UH Manoa are discussed in the cumulative impacts sections of Chapters 3 and 4 of the Final EIS. The future extensions are not part of the Project, thus they are not required to be evaluated under Chapter 343 of the Hawaii Revised Statutes and NEPA. Under NEPA, environmental analysis is only required when there is a proposed action by a Federal agency. Here, because the future extensions are not proposed for implementation at this time, they are not part of the Project studied in the Final EIS and the City has not requested funding from the FTA for their construction. It would be premature to undertake an environmental analysis of the extensions (beyond the cumulative impacts analysis) because they are not part of the proposed action to be taken by the City and FTA. If the extensions are proposed for implementation in the

future, environmental analysis of the extensions and appropriate alternatives will be undertaken at that time.

G. Air Quality

As stated in Section 4.9.3 of the Final EIS, if the electricity used to operate the Project is generated by combustion, this may produce additional emissions. However, these emissions will be offset in whole or part by the reductions generated by reduced vehicle miles traveled (VMT), as indicated in Table 4-15. Furthermore, power plant emissions may be more easily controlled than emissions from individual automobiles.

Concerning the question about vehicle efficiency, the Project did take that into account. In addition, there would be a greater level of automobile use if the Project were not built (see Greenhouse Gases in Section 4.9.3 of the Final EIS).

The title of Table 4-12 in the Draft EIS was changed from "2030 Regional Pollutant Burdens (kg/day)" to "2030 Mobile Source Regional Transportation Pollutant Burden (kg/day)" in the Final EIS.

The Section 4.9 of the Final EIS was revised to state, "However, these emissions will be offset in whole or part by the reductions generated by reduced VMT, as indicated in Table 4-15."

Emission factors were developed using EPA's MOBILE6.2 Emission Factor program. Regulated fuel-efficiency rates, at the time of analysis, were incorporated into the program. Future fuel efficiency was not included in the analysis.

Also worth noting is the effort to replace fossil fuels with renewable sources of energy by HECO. As stated in the comment, this could take a long time, but as the sources of energy become "greener", so too will the Project.

H. Downtown Station Location

To maintain a 500-foot radius curve in that location would require realignment of Nimitz Highway farther into the harbor, reconfiguration of Nimitz Highway with fewer Koko Head-bound lanes, or construction of several large straddle-bent structures over the Koko Head-bound lanes of Nimitz Highway. This is not a practical alternative.

Under this avoidance alternative, the entrances would be in Irwin Memorial Park on the makai side and either Walker Park or Fort Street Mall on the mauka side. However, this station location would require a 250-foot curve radius to maintain a minimum distance between the edge of the station platform and end of curve. A 250-foot curve radius is less than the Project's design criteria of 500 feet. This tight radius would necessitate reducing speeds to 5 to 10 miles per hour, which is below the Project's design speed of 30 miles per hour. This would result in increased travel time and a decrease in user benefits. Additionally, placing an entrance makai of Nimitz Highway would impact Irwin Memorial Park, and a mauka entrance would block either the Fort

Street Mall or Walker Park, which are all Section 4(f) protected resources under the U.S. Department of Transportation Act of 1966.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Richard W. Ubersax, Ph.D.
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February 5, 2009

To: Mr. Wayne Y. Yoshioka
Department of Transportation Services
City and County of Honolulu
650 South King Street, 3rd Floor
Honolulu, HI 96813

CC: Mr. Ted Matley
FTA Region IX
201 Mission Street, Suite 1650
San Francisco, CA 94105

Comments on Draft EIS Chapter 4.9 (Noise and Vibration) and Technical Report RTD 2008f
(Honolulu High-Capacity Transit Corridor Project Noise and Vibration Technical Report, October 2008)

Dear Mr. Yoshioka:

I have broken my comments into three separate areas with respect to Chapter on Noise:

I. The DEIS and Technical Report do not meet the full-disclosure requirements specified in FTA's "Transit Noise and Vibration Impact Assessment" Manual (FTA-VA-90-1003-06, May 2006). It is imperative that modifications to the DEIS be made or included in a Supplementary EIS to satisfy these requirements.

II. The noise impact criteria methodology used in the DEIS does not adequately address noise impacts for all situations along the guideway. The City should review each of the areas cited in these comments and address them accordingly in the Final EIS or SEIS.

III. Lack of accountability for operating within noise standards. Since there are no City or State statutes for regulation of noise from mobile sources, objectionable noise from Project operation will be difficult control. It is imperative that appropriate statutes be adopted prior to start-up of any segment of the First Project.

Each of these areas is discussed in detail below. If you have any questions, please feel free to contact me by phone or email.

Respectfully yours,

Richard W. Ubersax

Richard W. Ubersax

P.S.: I have also sent an electronic copy to you via email.

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CONCLUSION:

It will be evident from the discussion that follows that the DEIS has not adequately analyzed noise along the guideway and has grossly underestimated the impact that noise generated by the Project will have on the quality of life of residents living close to the guideway. The DEIS "Summary of Environmental Effects" (DEIS Table 4-1) relating to noise indicates that there will be numerous "Moderate Impact" locations along the guideway, and that *"no feasible and reasonable mitigation is available to reduce moderate noise impacts that remain"*. The number of impacted sites would be much higher, and the level of impact would be more severe if the assessment:

a) followed the guidelines and recommendations in the FTA "Transit Noise and Vibration Impact Assessment" Manual

b) considered the open door and window lifestyle of our people, and

c) extended the study to include the instantaneous noise from each passing train

The ultimate message one gets from the DEIS is that there will be objectionable noise – although grossly understated – and that the City expects us to live with it or deal with it later. The time to deal with it is now, and not later.

It is understandable that the City has tried to gloss over the negatives of the Project; but it is unacceptable to push the Project forward while knowing the problems – and expect the people to accept it. If there is no way to mitigate the impact of noise (or other environmental effects) along sections of the guideway, a new design or route needs to be devised. Anything less is a gross injustice to the people. None of the three Build Alternatives is acceptable in their current form.

I. The DEIS and accompanying Technical Report do not satisfy the "full disclosure" requirements of NEPA.

Although the DEIS and Technical Report RTD 2008f provide much useful information on the fundamentals of noise generation, measurement, assessment criteria, impacts, and mitigation, they do not provide all of the information recommended by the FTA in the "Transit Noise and Vibration Impact Assessment" Manual (FTA-VA-90-1003-06, May 2006).

With respect to recommendations provided in the FTA Manual:

A. General

"To be effective, the noise and vibration analysis must be presented to the public in a clear, yet comprehensive manner. The mass of technical data and information necessary to withstand scrutiny in the environmental review process must be documented in a way that remains intelligible to the public. Justification for all assumptions used in the analysis, such as selection of representative measurement sites and all baseline conditions, must be presented for review." (FTA Manual page 13-1)

Although the Technical Report provides significantly greater detail than the DEIS, it does not provide sufficient detail to withstand "scrutiny" by the informed reader. There are remaining questions regarding the protocol used for determining existing noise, estimating project noise, evaluating noise impact at specific locations, and validation of mitigation measures.

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There is also concern about the Project's planned extensions to UH Manoa and Waikiki not being covered in detail in the DEIS.

The Technical Report addresses this issue in the Preface:

"Therefore, the focus of the Draft EIS is on the "First Project," a fundable approximately 20-mile section between East Kapolei and Ala Moana Center. The First Project is identified as "the Project" for the purpose of the Draft EIS.

This technical report documents the detailed analysis completed for the Full Project, which includes the planned extensions, related transit stations, and construction phasing. The planned extensions and related construction planning have not been fully evaluated in the Draft EIS and are qualitatively discussed in the Cumulative Effects section of the Draft EIS as a foreseeable future project(s). Once funding is identified for these extensions, a full environmental evaluation will be completed in a separate environmental study (or studies), as appropriate."

The extensions are an integral part of the ORTP 2030 plan and should be assessed with the same degree of detail in the DEIS as the three Project "alternatives" (Salt Lake alternative, Airport Alternative, and Airport & Salt Lake alternative), especially since the noise impacts of these extensions are expected to be greater and more difficult to mitigate than for the Project. The fact that the DEIS uses the term "First Project" as a descriptor for the "Project" fully indicates that the City's intent is to complete the Full Project, and thus the extensions should be treated with the same level of detail in the DEIS as the Project.

B. Existing Noise

"Measurement procedures should be fully described. Tables of measurement instruments should include manufacturer, type, serial number and date of most recent calibration by authorized testing laboratory. Measurement periods, including time of day and length of time at each site should be shown to demonstrate adequate representation of the ambient conditions. The measurement data should be presented in well organized form in tables and figures." (FTA Manual p. 13-2)

Neither the DEIS nor Technical Report adequately describe details of the methods used for measuring the ambient sound levels at each receptor site. The following information should be included:

- detailed description of measurement instruments and calibration documentation
- precise location of receptor sites (exact coordinates including elevation); location of identified sensitive sites relative to each receptor site (including elevation); location of sensitive sites relative to guideway
- precise time of measurement including day of week, time of day, length of time
- assumptions made in calculations of L_{max}, L_{eq}, L_{dn}, etc.
- unusual occurrences and treatment thereof

C. Prediction of Future Project Noise

"The prediction model used for estimating future project conditions should be fully described and referenced. Any changes or extensions to the models recommended in this manual should be fully described so that the validity of the adjustments can be confirmed. Specific data used as input to the models should be listed. Computed levels should be tabulated and illustrated by contours, cross-sections or shaded mapping. It

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is important to illustrate noise/vibration impacts with base maps at a scale with enough detail to provide location reference for the reader." (FTA Manual p. 13-2)

Neither the DEIS nor Technical Report describe the methodology used for estimating project noise. The following information should be included:

- detailed description of prediction model, and if different from that recommended in FTA-VA-90-1003-06, the justification for deviation; any adjustments to the model should be described in detail.
- specific data used as input to the model should be described including:
  - source reference noise level (unmitigated and mitigated) with supporting details (i.e., vehicle configuration, vehicle speed); details of mitigation techniques and comprehensive justification of mitigated levels (i.e., effect of skirts and parapet wall independently, and combined effect)
- tabulated results for each specific receptor (and relevant impacted sensitive sites) with all assumptions disclosed
- precise distance between receptor and source
- location of receptors (and sensitive sites) relative to source (i.e., distance above/below source)

It is not clear from the DEIS or Technical Report whether the noise impact of vehicles on opposite tracks are treated the same, or whether converging trains are treated. The distance of the train from the receptor, and mitigation by the intervening parapet wall (and thus the noise impact) will be different depending on train direction. This situation should be analyzed and treated appropriately (with explanation) in the FEIS/Technical Report.

Similarly, the DEIS and Technical Report do not address the impact of reflection of sound energy at locations where the guideway traverses in close proximity to buildings on both sides (e.g., Halekauwila Street, etc., UH Manoa extension, Waikiki extension). If it is determined that reflection is inconsequential, it should be stated with appropriate justification. If not, it should be addressed in the assessment.

The DEIS and Technical Report depict noise impact data as distinct individual points along the guideway at ground-floor elevations (except in locations that included buildings of four or more stories). In the FTA manual, it is recommended that impacts be presented in the form contour maps. It would be highly desirable to represent these contours as a function of distance from the guideway as well as overlays to represent elevations above and below the guideway. The maps should be presented in a scale with enough detail to precisely determine distance of each contour line from the guideway. A format similar to DEIS Appendix A would be acceptable, but at 1" = 100' scale).

D. Mitigation

"The mitigation section of the technical report should begin with a summary of all treatments considered, even if some are not carried to final consideration. Final candidate mitigation treatments should be considered separately with description of the features of the treatment, costs, expected benefit in reducing impacts, locations where the benefit would be realized and discussion of practicality of implementing alternative treatments. With respect to noise impacts, enough information is to be included to allow the project sponsor and FTA to reach decisions on mitigation prior to issuance of the final environmental document." (FTA Manual p. 13-3)

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The project already includes an integrated noise-blocking 3'-high parapet wall on each side of the guideway and a system specification for vehicles with wheel skirts. The parapet wall is expected to reduce noise at or below track level, and the skirts to reduce noise at or above track level. Each data point in the DEIS represents the noise impact with the wall and skirt mitigation measures in place; while Appendix A of the Technical Report, provides project noise impacts with and without these mitigation measures. From Appendix A, it is clear that project noise would be "severe" or "moderate" at most receptor sites without the prescribed mitigation measures. Since the proposed mitigation methods provide only an estimate of actual noise attenuation, it is possible that many of the sites listed as "no impact" could actually be "moderate impact" and sites listed as "moderate impact" could actually be "severe impact".

In situations where noise-sensitive sites exist above the guideway, additional mitigation measures might be needed because of reflection from the guideway surface and lower efficiency of the parapet walls. These sites should be identified and additional mitigation measures identified. The DEIS and Technical Report address this issue to some degree, but it would be highly desirable to include specific recommendations and supporting data to support the recommendations.

The FTA Manual recommends that a summary of "all" treatments considered. Although the Technical Report mentions two additional measures, there are numerous others available (such as an additional wall on the centerline of the guideway). These should be described in detail (along with the benefit expected).

The FTA Manual discusses operational restrictions as a means to mitigate noise, but does not impose them because of their impact on system efficiencies, economics, etc.

"Two changes in operations that can mitigate noise are the lowering of speed and the reduction of nighttime (10 pm to 7 am) operations. Because noise from most transit vehicles depends on speed, a reduction of speed results in lower noise levels. The effect can be considerable. For example, the speed dependency of steel-wheel/steel-rail systems for L_{eq} and L_{dn} (see Table 6-4) results in a 6 dB reduction for a halving of the speed. Complete elimination of nighttime operations has a strong effect on reducing the L_{dn}, because nighttime noise is increased by 10 decibels when calculating L_{dn}." (FTA Manual p.6-41).

The City should anticipate reducing speed in noise-sensitive areas (below the 45 mph initially planned), and incorporate this scenario in the financial risk analysis section of the DEIS.

The maximum acceptable limits for project noise should be specified in the FDIS (or SEIS), along the length of the guideway (depending on noise impact sensitivity). Shortly after commencement of system operation, detailed measurements should be made to ensure compliance with these limits.

To further ensure that noise from the project is within acceptable limits, City Council (or if necessary, State Legislature) should legislate noise limits along the guideway. Prior to issuance of the FEIS, a written commitment from the City (or State) should be made to pass legislation prior to start up of the project that specifies maximum noise allowed at residential building setbacks and requires a reduction in speed if Project noise level exceeds specification until other mitigation measures can be implemented.

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II. The DEIS noise impact criteria methodology does not adequately address noise impacts in all situations:

A. FTA criteria underestimate actual noise impact by use of L_{dn} or the L_{eq}

The FTA criteria incorporate average noise measurements and de-emphasize short-term noise occurrences. However, in some cases, the use of L_{max}, or the maximum noise recorded over a short time interval, is a more meaningful measure of unacceptable noise level, as explained in the FTA Manual:

The assessment of noise impact in this manual utilizes either the L_{dn} or the L_{eq} descriptor. As such, in determining impact it is not necessary to determine and tabulate the maximum levels (L_{max}). However, it is often desirable to include computations of L_{max} in enviranmental documents, particularly for rail projects, because the noise from an individual train pass by is quite distinguishable from the existing background noise. The L_{max} is also the descriptor used in vehicle specifications. Because L_{max} represents the sound level heard during a transportation vehicle pass by, people can relate this metric with other noise experienced in the environment. Particularly with rail transit projects, it is representative of what people hear at any particular instant and can be measured with a sound level meter." "Thus, although L_{max} is not used in this manual as a basis for assessing noise impact, it can provide people with a more complete description of the noise effects af a proposed project and should be reported in environmental documents." (FTA Manual p.6-29)

"Although the maximum noise level (L_{max}) is not used in this manual as the basis for the noise impact criteria for transit projects, it is a useful metric for providing a fuller understanding of the naise impact from some transit operations. Specifically, rail transit characteristically produces high intermittent noise levels, which may be objectionable depending on the distance from the alignment. Thus, it is recommended that L_{max} information be provided in environmental documents to supplement the noise impact assessment and to help satisfy the "full disclosure" requirements of NEPA."(FTA Manual p. 3-9)

This is an especially critical issue in residential areas that are in close proximity to the guideway (<100 feet). In many cases, transit vehicles will pass well within 100 feet, and in some cases as close as 30 feet of windows in residential areas. In these situations, L_{max} would be a more meaningful noise descriptor.

In Hawaii's tropical climate, it is often necessary to keep windows and doors open for personal comfort since many residences do not have air conditioning. In this case, the actual noise of the passing train, L_{max} , is the best measure for judging the real-life impact of the event. Although the FTA noise impact classification might be "No Impact" or "Moderate Impact", affected residents will perceive it as being "Severe Impact". Air conditioning as a mitigation measure would not be accepted by the tropical culture, and would increase the electrical burden of the public.

Neither the DEIS nor Technical Report address this issue even though many residential properties will be severely affected. It is imperative that these issues be addressed in the FEIS or SEIS.

B. FTA criteria underestimate actual noise impact by applying criteria "outside" of residential building locations

"For residential lond use, the noise criteria are to be applied outside the building locations at noise-sensitive areas with frequent human use including outdoor patios, decks, pools, and play areas. If none, the criteria should be applied near building doors and windows." (FTA Manual p. 3-10)

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As discussed above, the nature of the climate and lifestyle require windows and doors to be open, in some cases year-round. In typical residential construction (double-pane windows and doors), noise can be mitigated by as much as 25 dB; but in Hawaii, with doors and windows open most of the time, the actual noise can be much louder than indicated by the FTA criteria, and thus, although classified as "No Impact" or "Moderate Impact", should actually be classified as "Moderate Impact" or "Severe Impact".

Neither the DEIS nor Technical Report address this issue even though many residential properties will be adversely affected. It is imperative it be addressed in the FEIS or SEIS.

C. FTA criteria underestimate actual noise impact by referencing to ambient noise

The FTA criteria for project noise impact is based on average project noise levels compared to average background (ambient) noise levels: higher project noise is permitted at higher ambient noise levels. However, in many cases, the absolute total noise level (sum of ambient and project) should be used to establish the impact of the project on noise severity as described in the FTA Manual:

"Ambient levels above 65 dB (L_{dn}) are considered "normally unsatisfactory" for residential land use by the Department of Housing and Urban Development. Thus there is a stronger need for mitigation if a project is proposed in an area currently experiencing high noise levels from surface transportation. An example would be a project where additional commuter tracks are added to a very busy rail corridor. If this project were placed in a less noisy environment, the impact assessment might show a Severe Impact, but when the project is overlaid on an existing noisy environment, the result could be Moderate Impact or, possibly, No Impact. However, in this situation the new cumulative noise environment may be very objectionable because people will not be compartmentalizing the existing noise versus the new noise and reacting only to the new noise. In this circumstance impacts predicted in the Moderate range should be treated as if they were Severe. (FTA Manual p. 3-12)

In the FEIS or SEIS, every receptor site should be assessed to determine how application of this criterion would affect the noise impact rating.

D. FTA criteria underestimate actual noise impact by time averaging technique

Ambient L_{dn} is averaged over the full 24-hour day, and remains the same whether the Project is operating or not. Noise generated by the Project (L_{dn}) is also a 24-hour average, but the Project is not expected to operate during the nighttime hours of midnight to 4 AM. During this period, project noise is "zero", so the calculated Project L_{dn} is lower than if trains were running through the night. This calculated L_{dn} could result in a reduction in noise impact from "Severe Impact" to "Moderate Impact" (or "Moderate Impact" to "No Impact") even though the instantaneous impact (L_{max}) for each train passing is the same, independent of pass-by frequency.

The same effect would be realized if the frequency of passing a specific receptor site were to be reduced, e.g., by increasing headway. Illustrative of this concept is in the comparison of common receptor sites along the Salt Lake Alterative versus the Salt Lake &Airport Alternative. The frequency of passing trains along Salt Lake Blvd for the Salt Lake & Airport Alternative will be one-half of that for the Salt Lake Alternative. Thus, the calculated project noise levels (L_{dn}) for receptors along Salt Lake Blvd for the Salt Lake & Airport Alternative are significantly lower than

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for the Salt Lake Alternative. The consequence is that the five high-rise apartments along Salt Lake Blvd (receptors O and 16) are reduced in noise impact from "Moderate" to "No Impact" in the Salt Lake & Airport Alternative, even though the actual noise from each passing train is the same in either case.

These factors should be explained in the FEIS or SEIS so that the general public – especially those living close to the guideway– has a fuller understanding of the adverse impacts of the Project.

III. Accountability

At the present time, there are no State or County statutes for regulation of noise resulting from transit operations on the guideway. Without these statutes, it is virtually impossible for residents to force mitigation through legal channels. The City has no incentive for mitigation; in fact, it has a disincentive in that any mitigation will result in higher capital and/or operating cost. It is imperative that such statutes be enacted (with full involvement of the public) prior to commencement of service. Such legislation should require reduction in speed as an interim mitigation measure until permanent physical mitigation can be implemented.

(Note: HAR 11-46 is the correct statute for stationary noise listed on DEIS p. 4-98, and not 11-16)

It is unsettling that the City and its consultants have not addressed the noise issue – or other potential negative impacts of the project – more seriously; nor considered the reaction of the public after implementation. It's as if the attitude is to forge ahead and face the consequences later. For a project that has such a large environmental and economic impact, this is behavior is irresponsible, and should be accounted for.

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DEPARTMENT OF TRANSPORTATION SERVICES

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SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT2/09-299118R

Mr. Richard W. Ubersax
41-1013 Laumilo Street
Waimanalo, Hawaii 96796

Dear Mr. Ubersax:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

The Honolulu High-Capacity Transit Corridor Project Noise and Vibration Technical Report and Addendum include the methodology for the noise analysis, including the types of noise meters used for all measurements and the times of measurement. The technical report can be obtained from DTS and on the project website (www.honolulutransit.org). The exact site locations are not relevant to the overall impact analysis because, per FTA methodology, all measurements were taken in representative locations that are typical of noise-sensitive uses in the vicinity of the measurements.

FTA does not recommend use of contour maps. Section 13.2.1 of the FTA Noise and Vibration Manual specifies that locations where impacts are expected to occur should be described. These locations are shown in Figures 4-53 through 4-56 of the Final EIS.

The project design includes an integrated parapet wall at the edge of the guideway structure that extends three feet above the top of the rail. The parapet wall will substantially reduce ground-level noise.

In areas with high-rise apartments and hotels that have lanais above the elevation of and facing the rail, the parapet wall will have a limited benefit (less than a 3-dBA noise reduction) at floors above the level of the guideway. Wheel skirts will increase the benefit from the parapet wall at locations above the elevation of the track. Project noise levels without wheel skirts are provided in Addendum 01 to the Noise and Vibration Technical Report.

The use of sound-absorptive materials below the tracks in the three areas that will experience moderate noise impacts will reduce the Project noise levels from the upper floors to below the impact level As a result, there will be no unmitigated noise impacts. System operations will not be compromised.

Because other mitigation will eliminate noise impacts, operating changes that would reduce system benefits are not being considered.

The appropriate noise impact criteria at each site along the project alignment are shown in Figures 4-53 through 4-56 of the Final EIS.

According to Section 2.5.7 of the FTA Manual, "The Lmax descriptor is not recommended for a transit noise impact assessment..." Separately described maximum noise levels are not necessary to the calculation of the Day Night Average Sound Level (Ldn), which is the prescribed metric (sound descriptor) to be used in an FTA noise impact analysis for residential uses, or the Equivalent Sound Level (Leq), which is used for sensitive uses without a "sleeping" component. While Lmax does reflect the maximum noise from a single event, it does not describe either the frequency or duration of the noise event. Lmax is not used in transit noise assessment because it would not differentiate the impact of a single transit vehicle occurring once during the daytime from a constant flow of vehicles occurring over all daytime and nighttime hours.The maximum sound level is included in the Sound Exposure Level descriptor of rail transit noise that was used to calculate future project operational Ldn and Leq noise levels. The information provided in Appendices E and F of the FTA Guidelines may be used to calculate the Lmax if desired.

As described above, Lmax is not an appropriate descriptor for transit noise impact analysis.

Figure 4-37 of the Draft EIS provided Lmax for a train pass-by at 50 feet (approximately 68 to 70 dBA for the Project).

Because the Project will not cause any adverse noise impacts, with the proposed mitigation, air conditioning equipment will not be necessary or installed.

The FTA analysis methodology addresses noise impacts based on change in exterior noise levels caused by the Project.

Current FTA guidance is to use Ldn or Leq to address noise impacts. The consideration of Lmax is discussed above.

Concern regarding noise ordinances and legislation related to fixed guideway noise is noted.

Proposed changes in noise statutes should be addressed to the State legislature. All noise impacts have been evaluated, and mitigation measures have been developed to eliminate the impacts.

HAR 11-46 is not intended to be used for transportation projects. As the purpose states, "It is the purpose of this chapter to define the maximum permissible sound levels and to provide for the prevention, control, and abatement of noise pollution in the State from the following excessive noise sources: stationary noise sources; and equipment related to agricultural, construction, and industrial activities. It is also the purpose of this chapter to establish noise quality standards to protect public health and welfare, and to prevent the significant degradation of the environment and quality of life."

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Is it possible to solve traffic congestion and keep Honolulu beautiful?

I believe that in the very near future that newer technology will make use of rail obselete; that new technology use will make vehicles cleaner and environmentally friendlier than rail. Just look at how technology has improved our quality of life by making things run better and more efficiently. Electric autos, hydrogen fuel cell powered magnet guided buses and the sky tran using meglev will change the way we travel and protect our environment. Fossil fuel use in Hawaii drop significantly and be supplanted by the creation of energy using natural sources of energy found in abundance here aided by the efforts of the federal government and our governor.

Mass transportation using the Phileas magnetic guided bus for example uses GPS and magnets embedded in roads to guide buses on a concise path like rail automatically without need for steering. The bus will open with wide doors with its platform level with the curb height and within an inch of the curb to allow for wheelchair and children tram access without stepping into the street or need to climb stairs like conventional buses. This vehicle is currently being road tested by Caltran in California and is predicted one day to be operational in California and Oregon. It has been operational since 2004 in Denmark and is being used in Turkey. Japan and South Korea are also considering using this bus. This same bus company came to present this technology to the city council, but was prevented from doing so by the pro-rail council.

Governor Linda Lingle has given permission for a private company based in California to bring electric cars to Hawaii and be the first state in use this technology. It is her goal to make Hawaii 40% energy sufficient by 2030 and eventually an energy exporter, using Hawaii's natural resources of wind, ocean (wave energy and thermal energy), geothermal, and solar energies. We need the Governor to help provide traffic relief for H-1. Which is under the State's jurisdiction. The Governor believes that a non biased panel should assess whether rail is cost effective and the best solution available.

The skytran is experimental vehicle that merits consideration for use in Honolulu. It offers the potential of moving single passengers in small pods traveling via a sky grid using meglev technology for propulsion. This system is currently being tested in L.A. and has seems to have the potential

Michael Uechi

of moving people intracity and between cities. Like the meglev rail it has the ability to move people rapidly over long distances. This system uses commonly used materials found in all locales and easily assembled and cost effective. The grid system appears to be small and visually unobtrusive.

Mike Uechi

What is wrong with rail?

I envision delays especially eastward of Iwilei where Hawaiian burial sites or iwi, will alter rail's route and result in prolonged construction delays affecting businesses and traffic. The visual blight of rail in downtown Honolulu, especially the huge station on Bishop Street will be not only be an eye sore but a reminder of the asinine short sightedness of our city planners as the heavy rail screeches on during the day and late into the night.

Rail is old technology and hindered by extremely high capital costs and maintenance costs which will be the responsibility of our residents for generations. What will happen when the obsolete rail needs parts for repair? What happens to the white elephant if funds run out? What happens if there is poor ridership and we can no longer afford upkeep? What happens to rail and stations when they become perfect places for druggies, for graffiti artists, pan handlers, women of the night to conduct their business? Our city's maintenance of infrastructure is so poor, one has to wonder how the city will manage maintaining the rail.

The added expenditure of this costly project that will only increase traffic congestion to our already congested city streets and not provide traffic relief for our leeward and central Oahu commuters should be put to rest. Rail will not only be a detriment to our environment but be a detriment to our quality of life. By using the moneys for rail we will further neglect our (1) aging sewers that are leaking " brown waste" that contaminates our beaches during heavy rains, (2) secondary treatment plants that continue to dump improperly treated sewage into our ocean, (3) waste management, (4) landfill and (5) "pot hole" roads and freeways. Our parks and recreational facilities also reflect our city's neglect of taking care of city properly.

We wonder how this city will be able to manage a complex rail system when it has proven to be woefully incompetent in managing its infrastructure.

Mike Uechi

How was the public duped into choosing rail?

The current city administration from its inception choose not to use public deliberation to discuss rail alternatives. I have attended almost all of the community outreach meetings and can testify that there was no meaningful intercourse between the pro rail city appointed panelists and the opposition group. From the inception the City administration had chosen to ram rail down our throats with no consideration for any meaningful deliberation with the public. An advertisement extravaganza by the Mayor using taxpayers money, some 3 million plus dollars, to dupe the public into believing in the merits of rail allowed rail to narrowly defeat no rail in the general election. The mayor stated that the feds mandated that the city promote rail through advertisements.. An inquiry by Hawaii Reporter proved this to be untrue. The Mayor used taxpayers money under a false premise. The Mayor also stated that he would stop the actions of StopRailNow, a citizens group formed to allow the people to vote on whether to choose rail. The citizens right to use initiative as prescribed by the City Charter was being publically attacked by the Mayor. These are examples of the Mayor's heavy hand in promoting only rail and nothing else.

As a result of the dictatorial, non democratic ,unrestricted whims of the city administration and a non bid rail process that proceeded without any oversight we end up with a rail project that according to the rail propaganda will be solely financed by federal and state .5% excise tax. Nothing could be further from the truth as the price tag of rail has been increasing exponentially in price from 2.7 billion in 2004 to 5.3 billion in 2008 (Advertiser and Star Bulletin newspapapers 12/2008).
To add to the insult rail was never intended to solve traffic congestion on our only major highway H-1. Congestion will worsen by 70% by 2030).

As a physician we use a phrase called curb side consultation to seek solutions to problems. I find that the most prudent way to reach a reasonable solution to any problem is to consult with others, better yet with others that have opinions different than mine to learn of new teachings and technology for my patients well being. We are trained to defend our position until someone else has a better solution. We then work with the better solution and bury the older obsolete method or system. We should bury rail, for there are many more better solutions.

M. Uechi

Summary

With the recent state's highway modernization project which will significantly reduce commute time, as well as be constructed much sooner and with significantly less cost to the public, the introduction of rail, which by comparison is definitely a very poor alternative.

Mike Uechi

DEPARTMENT OF TRANSPORTATION SERVICES

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June 11, 2010

RT10/09-337646

Mr. Mike Uechi
98-111 Kaahele Place
Aiea, Hawaii 96701

Dear Mr. Uechi:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address comments regarding the above-referenced submittal:

Comments on Chapter 2 of the Draft EIS: Alternatives Considered

Technology related to transportation continues to evolve. Improvements to all modes, including transit and single-occupant vehicles, will make those modes safer and more efficient. The changes mentioned in the comment may make the internal combustion engine used in automobiles today obsolete; however, they would enhance the attractiveness of an electrically-powered rail system, which already consumes less energy per passenger-mile carried than automobiles, as is illustrated by the reduced energy demand shown in Section 4.11 of the Final EIS. Furthermore, none of the technologies mentioned in the comment letter (Mag-Lev; Sky-Tran and the Phileas system) are available for broad application at this time. They are all experimental or in demonstration modes.

As discussed in Chapter 2 of the Final EIS, additional alternatives, including other technologies, were evaluated during the Alternatives Analysis phase of the Project (2005 to 2006). The Alternatives Analysis phase evaluated a range of transit mode and general alignment alternatives in terms of their costs, benefits, and impacts. An initial screening process (fall of 2005 to winter of 2006) considered alternatives identified through previous transit studies, a field review of the study corridor, an analysis of current population and employment data for the study corridor, a literature review of technology modes, work completed for the Oahu Regional Transportation Plan 2030 (ORTP) prepared by the Oahu Metropolitan Planning Organization (OahuMPO) (OahuMPO 2007), and public and agency comments received during the formal Alternatives Analysis scoping process. The alternatives screening process is documented in the Honolulu High-Capacity Transit Corridor Project Alternatives Screening Memorandum (DTS 2006a).

Three scoping meetings were held as part of the screening process in December 2005 with the purpose of presenting alternatives to the public, interested agencies, and officials and receiving comments on the Purpose and Need, alternatives, and scope of the Alternatives Analysis:

- *December 13, 2005: Neal S. Blaisdell Center, Pikake Room at 777 Ward Avenue in Downtown Honolulu from 2:00 pm to 4:00 pm (agency scoping meeting)*
- *December 13, 2005: Neal S. Blaisdell Center, Pikake Room, at 777 Ward Avenue in Downtown Honolulu from 5:00 p.m. to 8:00 p.m. (open to the public)*
- *December 14, 2005: Kapolei Middle School Cafeteria at 91-5335 Kapolei Parkway in Kapolei from 7:00 p.m. to 9:00 p.m. (open to the public)*

Refinements were made to the alternatives as a result of public comments. The comments received during scoping meetings are provided in Appendix G of this Final EIS.

After completion of screening in the winter of 2006, the following alternatives were studied in the Alternatives Analysis: No Build Alternative, Transportation System Management (TSM) Alternative, Managed Lane Alternative, and the Fixed Guideway Alternative. After review of the Alternatives Analysis Report and consideration of public comments, the City Council identified a fixed guideway transit system extending from Kapolei to UH Manoa with a connection to Waikiki as the Locally Preferred Alternative. This identification, which eliminated the TSM and Managed Lane Alternatives from further consideration, became Ordinance 07-001 on January 6, 2007. The NEPA process considered a range of alternatives that was consistent with the identified Locally Preferred Alternative. As discussed in Section 2.2.2, there were no alternatives that had not been previously studied and eliminated for good cause that would satisfy the Purpose and Need at less cost, with greater effectiveness, or less environmental or community impact.

As stated in Section 2.2.3 of this Final EIS, the NEPA Notice of Intent requested input on five transit technologies. A technical review process included the opportunity for public comment and was used in parallel with the alternatives analysis to select a transit technology. The process included a broad request for information that was publicized to the transit industry. Transit vehicle manufacturers submitted 12 responses covering all of the technologies listed in the Notice of Intent. An independent five-member technology panel composed of four transit experts and a transportation academic appointed by the City Council evaluated guided rubber-

tire-on-concrete systems (e.g., Phileas bus system and VAL-type systems), monorail (which is a variation on rubber-tyred technology), steel-wheel-on-steel-rail systems, (e.g., light rail and rapid rail), and magnetic levitation (MAGLEV). The panel considered the performance, cost, and reliability of the proposed technologies.

Proprietary technologies, meaning those technologies that would have required all future purchases of vehicles or equipment to be from a single manufacturer, were eliminated because none of the proprietary technologies offered substantial proven performance, cost, and reliability benefits compared to steel wheel operating on steel rail.

The panel accepted public comment twice as part of its review. By a four-to-one vote, the panel chose a steel wheel vehicle operating on steel rail system because it was considered safe, reliable, economical, and non-proprietary. Those results are documented in the panel's report to the City Council dated February 22, 2008 entitled "Independent Technology Selection Panel Report".

Comments on Chapter 4 of the Draft EIS: Environmental Analysis, Consequences, and Mitigation

Regarding construction delays, FTA and the City have developed a Programmatic Agreement in consultation with the State Historic Preservation Division and other consulting parties to address any affected Native Hawaiian burials or other historical or archaeological resources. The Programmatic Agreement is included in Appendix H to the Final EIS. The Project may be subject to compliance with the Native American Graves Protection and Repatriation Act (NAGPRA) (25 USC 3001) where it crosses lands controlled or owned by the Federal Government. Any human remains found on lands owned or controlled by the Federal government will be addressed in accordance with NAGPRA and 43 CFR 10—the regulations that define the process and procedures of NAGPRA.

The Programmatic Agreement requires the completion of archaeological inventory surveys prior to construction of project elements. During the archaeological survey, any Native Hawaiian burials that are identified will be managed in compliance with applicable laws. This will include consultation with project proponents, the Oahu Island Burial Council, SHPD, and recognized lineal and/or cultural descendants to develop burial treatment plans. Although the goal of the archaeological sampling will be to identify all burials and treat them appropriately prior to the start of construction in a particular area, the possibility exists that additional previously undiscovered burials will be encountered during construction. In addition, protection zones will be created around resources that are identified prior to construction. The Programmatic Agreement stipulates that the treatment of burials discovered during construction will follow state law, which includes a timeline to address inadvertent discoveries of burials during construction and to avoid substantial project delays.

The Project is a Fixed Guideway Transit system. The system will use steel-wheel-on-steel-rail technology. Current versions of steel wheel on steel rail technology are quieter than a bus at the same distance. Noise and vibration effects from the Project were evaluated following FTA guidance and are detailed in Section 4.10 of the Final EIS. The Project will cause no severe noise impacts. Moderate impacts will occur at upper floors of a few high-rise buildings

(as shown in Table 4-18 in the Final EIS). With the committed mitigation in place (sound absorbing material and wheel skirts), the noise analysis indicates that the new noise generated by the Project will be lower than the existing noise levels in most places. The project design includes an integrated noise-blocking parapet wall at the edge of the guideway structure that extends three feet above the top of the rail. The parapet wall will substantially reduce ground-level noise.

As committed to in the Final EIS, wheel skirts will increase the benefit from the parapet wall at locations above the elevation of the track. The use of sound-absorptive materials below the tracks in the areas that will experience moderate noise impacts will reduce the Project noise levels from the upper floors to below the impact level. Once the Project is operating, noise levels will be re-measured to confirm that there are no noise impacts from the Project.

The island's unique visual character and scenic beauty was considered in the visual and aesthetic analysis presented in the Draft and Final EISs. As discussed in Section 4.8 of the Final EIS, the Project will be set in an urban context where visual change is expected and differences in scales of structures are typical. The following measures will be included with the Project to minimize negative visual effects and enhance the visual and aesthetic opportunities that it creates:

- *Develop and apply design guidelines that will establish a consistent design framework for the Project with consideration of local context.*
- *Coordinate the project design with the City transit-oriented development program within the Department of Planning and Permitting.*
- *Consult with the communities surrounding each station for input on station design elements.*
- *Consider specific sites for landscaping and trees during the final design phase when plans for new plantings will be prepared by a landscape architect. Landscape and streetscape improvements will serve to mitigate potential visual impacts.*

It should also be noted that the Project will provide users, including tourists, with expansive views from several portions of the corridor by elevating riders above highway traffic, street trees, and low structures adjacent to the alignment. In Section 4.8.3 of the Final EIS under the heading Design Principals and Mitigation, specific environmental, architecture and landscape design criteria are listed that will help minimize visual effects of the Project.

The fact that this will be the only island with high-capacity transit, with an efficient airport connector, may in fact attract more tourists who value the convenience, potential cost savings, and decreased travel time between various tourist destination spots along the Project's alignment.

Rail, as a technology, predates the automobile by a few years. It is a well-established technology with a long track-record of good performance and continued technological

development. The rail options considered for Honolulu are modern, quiet systems that are more fuel efficient per passenger than the automobile and which can easily carry large volumes of people. Please refer to the discussion on the technology selection process that was discussed earlier in this response.

Ridership forecasts are over 116,000 per day in 2030 as noted in Chapter 3 of the Final EIS. The Project's financial plan described in Chapter 6 of the Final EIS includes ongoing operation and maintenance funding for the Project. One of the factors cited in the selection of steel wheel technology was standardization, so that replacement vehicles and other system elements would be available from multiple sources. Stations will accommodate an attendant to help prevent the types of vandalism and nuisances described in your comment. Section 2.5.4 of the Final EIS describes security measures that will be implemented with the Project.

Table 3-14 of the Final EIS shows that implementation of the fixed guideway alternative is forecast to result in an 18 percent decrease in traffic delay and congestion compared to the No Build Alternative or the other alternatives that do not include a fixed guideway system. The local and federal New Starts funds anticipated to be used for constructing the Project are available only for the specific purpose of building a fixed guideway system. They cannot be used for sewer, solid waste, or highway projects. Chapter 6 of the Final EIS contains a detailed discussion of the financial analysis prepared for the Project and the availability of the proposed funding sources for the Project.

Comments on Chapter 8 of the Draft EIS: Comments and Coordination

The overall public information program has been continuous since the beginning of the Project in 2005 and has met the requirements of SAFETEA-LU Section 6002. The Alternatives Analysis phase evaluated a range of transit mode and general alignment alternatives in terms of their costs, benefits, and impacts. During the fall of 2005 and winter of 2006, the City and County of Honolulu completed the alternatives screening process that is documented in the Honolulu High-Capacity Transit Corridor Project Alternatives Screening Memorandum. As detailed in Chapter 8 of the Final EIS, scoping meetings were held, which included a presentation of alternatives to the public and interested agencies and officials to receive comments on the Purpose and Need, alternatives, and scope of the analysis for the Alternatives Analysis. Refinements were made to alternatives based on the public input during scoping.

Guidelines set forth by NEPA, as amended, and Chapter 343 of the Hawaii Revised Statutes stipulate that public involvement be carried out on large-scale projects such as the rail project. As a large infrastructure project, the City felt it was important to disseminate information to as many people as possible. Thus, a broad range of print and visual media and community outreach were necessary to reach different population segments. Project funds were used for the public involvement activities listed in Chapter 8 of the Final EIS as required by NEPA. In addition, all testimony and comments received during the public hearings were answered and a written or electronic letter was sent when the Final EIS was issued. Questions and comments have been taken and addressed from all members of the public. Information presented about the Project in public presentations has been reviewed to ensure that information presented is accurate. All individuals have been provided equal opportunity to express their opinions within

an established time limit. Dates and times for meetings and discussions held under the public involvement process are presented in Chapter 8 of the Final EIS.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

UltraSystems
environmental•management•planning

February 6, 2009

Mr. Ted Matley
U. S. Department of Transportation
Federal Transit Administration – Region IX
201 Mission Street, Suite 1650
San Francisco, CA 94105

Mr. Wayne Y. Yoshioka
Department of Transportation Services
City and County of Honolulu
630 South King Street, 3rd Floor
Honolulu, HI 96813

Re: Comments on the Draft Environmental Impact Statement (DEIS)/Section 4(f) Evaluation for the Honolulu High-Capacity Transit Corridor Project

Dear Messrs. Matley and Yoshioka:

UltraSystems Environmental (UltraSystems) was retained by Kamehameha Schools (KS) to conduct an independent review of the subject DEIS and companion technical reports, and to prepare the following findings and comments. (KS is preparing its own comments and sending them in a separate letter.) UltraSystems is one of the leading environmental planning and consulting firms in the western United States, and has extensive experience in preparing technical studies and environmental documents. Its services include environmental analyses, air and noise impact studies, transportation, biology and wetlands, Phase I and II environmental site assessments, hazardous materials management, and land use studies.

UltraSystems has a distinguished track record in preparing high-quality environmental documents for residential, commercial, industrial, institutional, transit, transportation, and infrastructure-related projects for public and private sector clients throughout California and the western United States. Each of our six principals brings more than 30 years of experience in the preparation and peer review of environmental documents.

Besides reviewing the DEIS, UltraSystems reviewed the guidance provided by the Federal Transit Administration on preparing project Environmental Impact Statements;[1] the *Honolulu High-Capacity Transit Corridor Project Alternatives Analysis Report, City and County of Honolulu;* Hawaii Revised Statutes, Chapter 343 (Environmental Impact Statements), Hawaii Revised Statutes, Chapter 344 (State Environmental Policy); and the *City and County of Honolulu Land Use Ordinance* to gain a better understanding of the planning process being followed on the proposed Project and the local land use rules and regulations that will come into play on lands impacted by the Project.

[1] "National Environmental Policy Act." Federal Transit Administration – Planning & Environmental (www.fta.dot.gov/printer_friendly/planning_environment_225.html).

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The following comments summarize Project-related issues and questions that UltraSystems identified during its investigations. For your case in consideration of the comments, they are organized into nine topics. The presentation of each topic includes a general comment, followed by specific concerns.

A. Transportation

The Honolulu High-Capacity Transit Corridor project may create significant construction and operational traffic, roadway and parking impacts on adjacent KS-owned land that have not been adequately quantified and the proposed mitigation measures lack specificity or evidence that they will effectively reduce impacts to property owners and businesses.

Concern #A-1: Planned Parking Appears to be Insufficient and May Result in "Spillover" to Adjacent Commercial Properties

- The proposed Pearl Highlands Station would have a 1,600-space park-and-ride facility (DEIS, Page 2-27). Should additional parking be needed in the future, will sufficient space be available to expand the park-and ride lot? If insufficient parking is provided, those driving to this station will be forced to seek parking elsewhere.

- Dedicated kiss-and-ride pullouts (passenger drop off) or parking spaces are planned at many stations to facilitate drop-off and pick-up (DEIS, Page 2-36). No additional parking is shown for the Kapalama Station (DEIS, Page 2-31, Figure 2-31). Given that there appear to be no residences within the standard quarter-mile walking radius, it is reasonable to assume that riders will drive to this station—and need parking—or that few riders are expected at this station because it may be easier to simply drive into town from there. Please confirm if this station is intended to have fewer than average riders. If it is expected to have average per-station ridership, then please explain how parking demand will be handled if the City plans on drawing many riders from this area. If off-street parking is planned for this station, then please provide the parking report for public review. If off-street parking is not planned for this station, then please provide a report explaining the reasons for the expected low ridership at this station—and which stations are expected to carry the heavier rider loads. When showing the heavier rider loads please include in the report the number of riders expected there and the number of parking spaces required. Also, if people do end up riding from this station and parking, please provide a written plan showing how they will be accommodated so as to not have a negative impact on commercial tenants near this station.

- Twenty-six off-street parking spaces would be lost on Dillingham Boulevard between McNeill Street and Waiakamilo Road due to fixed guideway column placement in the median (Transportation Technical Report, Table 5-54, page 5-114). Commercial properties a few blocks west of the proposed Kapalama transit station will be affected.

- Ten off-street parking spaces would be lost on Dillingham Boulevard between Waiakamilo Road and Kohou Street due to fixed guideway column placement on the side (Transportation Technical Report, Table 5-54, page 5-114). The loss of off-street parking could impact customer and employee parking at Waiakamilo Shopping Center and buildings on both sides of Dillingham. (KS-owned land is on both sides of this section - McNeill to Kohou). What impact would the loss of these off-street parking spaces have on the commercial uses along Dillingham Boulevard?

- For the Kaka'ako station, 16 on-street Mauka and 22 on-street Makai parking spaces would be lost on Halekauwila Street between Keawe Street and Coral Street due to fixed guideway column placement on the side (Transportation Technical Report, Table 5-54, page 5-114; see also DEIS Page 2-32, Figure 2-35). Please describe the impact from the loss of these on-street parking spaces on businesses located on KS-

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owned properties and where those spaces could be replaced? This site is likely to be an a.m. net destination station more likely to have less parking demand than a net ride generating station.

- The *Transportation Technical Report* states that park-and-ride usage would be free (Section 5.6.2, page 5-86). It is a common experience throughout California that parking at transit stations is underestimated, and consequently, additional parking is often required after the initial construction, to meet the increased demand. This was certainly the case at UltraSystems' home base of Irvine, California, where a three-story parking garage was recently built for the Irvine Amtrak/Metrolink station, after the capacity of the original surface parking lot was exceeded. Based on this premise, land for more parking would likely have to be acquired. The Final Environmental Impact Statement (FEIS) for the Project should address the question of how the construction and maintenance costs for these additional facilities would be paid for. The FEIS' cash flow and budget should address this.

- The following additional mitigation measures for parking impacts should be included in the FEIS:

  - ✓ The foundations of parking garages for transit and bus patron parking shall be designed and constructed so that additional floors could be added as needed in the future.

  - ✓ Where parking structures are not planned to be built, enough land shall be acquired by the City and County of Honolulu so that surface lots can be expanded as necessary to handle future increases in parking requirements. It will be less costly to reserve the land now, rather than when the demand becomes acute.

Concern #A-2: Elimination or Narrowing of Existing Traffic Lanes May Result in Safety Problems

- In some cases, widening the existing street median to accommodate the columns for the fixed guideway would require reducing lane widths slightly. Table 3-21 (Column Placement Effects on Streets and Highways – page 3-39 of the DEIS) shows where columns would be placed and the new widths of traffic lanes on certain street segments. However, with only one exception, the table does not report the widths of the traffic lanes under the No Build Alternative.[2] Therefore, the extent of change in lane widths is not known. Although the transportation technical report reports historical accident rates, it and the DEIS are silent on the issue of impacts of lane width changes on road safety. **UltraSystems requests that a fully documented analysis of the effect (if any) of lane width reduction on traffic accident rates be included in the FEIS.**

- The FEIS should address the issue that the narrower lanes are likely to affect the operation of larger vehicles such as semi trucks and buses and create safety hazards. Operating large vehicles in 10 foot wide lanes may create an unreasonable risk of automobile accidents in these lanes and of risk to people and business near these rights-of-way.

- Along three street segments (Dillingham from McNeill to Waiakamilo, Halekauwila from Keawe to Coral, and Halekauwila from Punchbowl to South Street), sidewalks will be narrowed by one to five feet (DEIS, Table 5-57). Narrowed sidewalks can reduce bicycle and pedestrian safety, as sidewalk users would be moved closer to automobile traffic.

[2] Information on existing lane widths is also lacking in the transportation technical report.

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Concern #A-3: The impacts on traffic near the park-and-ride facility at the Pearl Highlands Station may not be sufficiently mitigated by the measures proposed in the DEIS.

Table 3-22 (Effects on Traffic near Park-and-Ride Lots – 2030 No Build and Build Alternatives) shows that the level of service (LOS) will remain at F for two intersections near the Pearl Highlands Station under the No Build and Build Alternatives. At a third intersection (Farrington Highway and Waiawa Street), the p.m. peak hour LOS will decline from D under the No Build Alternative to F under the Build Alternatives. Except for one instance (p.m. peak hour at Kamehameha Highway and Kuala Street), delays at all the intersection will be greater under the Build Alternative than under the No Build Alternative. According to the DEIS, potential mitigation measures include widening existing roads, signalizing intersections, and "other treatments." This raises some questions that need answering in the FEIS:

- What is the approximate amount of mitigation (in seconds of delay, for example) that would be expected from road widening and signalizing intersections?
- The term "other treatments" is too vague; what are some of them, and how effective would they be?
- Could the incorporation of feeder buses in the project design provide additional mitigation?

B. Safety and Security

Construction and operation of the transit project will create significant safety and security problems at the proposed Pearlridge Center, Kapalama and Kaka'ako transit stations to be constructed near of adjacent to KS-owned lands. **It is not clear from the DEIS how these problems would be addressed. Project safety features should be reviewed to determine whether they are adequate to ensure the safety of transit passengers at these stations.**

C. Land Use

Construction and operation of the transit project will impact a number of KS-owned lands near or adjacent to the Pearlridge Center and Kapalama stations and along Dillingham Boulevard, particularly in the Dillingham Plaza Area. The reduction in the size of KS owned parcels in these areas may result in the creation of existing, non-conforming uses that may hinder future redevelopment of these lands.

Concern #C-1: The loss of ten feet of land in front of commercial properties along Dillingham Boulevard, particularly in the area of Dillingham Plaza, will make land uses non-conforming and hinder future redevelopment.

- The loss of 10 feet of land in front of KS commercial-use properties will result in the loss of most of the landscaped area in front of these businesses and a number of existing mature street trees that are required by the City and County of Honolulu Land Use Ordinance.[3] Existing sidewalks in these areas will also be removed, with the sidewalks being moved back to the new edge of Dillingham Boulevard. This will result in a sidewalk/landscape area adjacent to the remaining businesses on these lands. It is assumed at this time that the loss of required lot size and landscaping will make all of these lots non-conforming, and subject to the constraints prescribed by Section 21-4.110 (Nonconformities) of the Ordinance. This may make the redevelopment of the commercial land uses on KS properties more difficult if these uses have to be brought up to the current City's current Land Use Ordinance at the time that they are developed. The FEIS should address this question and resolve it by more than providing perpetual variances, since this is also a matter of lost business opportunities caused by the impact of the Project.

[3] See Sections 21-3.110-1 (Business uses and development standards), 21-3.120-2 (Business mixed use district uses and development standards), and 21-4.70 (Landscaping and screening).

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- Loss of land along Dillingham Boulevard may also impact the landscaping for off-street parking, the size of parking spaces and the loading areas for the commercial uses along this street. These changes may make these lots non-conforming due to the lack of adequate landscaping for parking and loading areas.[4] Again, future redevelopment of the commercial use along Dillingham Boulevard may be impacted, with these lots and uses considered. This is a particular concern for the Boulevard Saimin Restaurant (1425 Dillingham Boulevard), which has only twelve parking spaces, two of which potentially will be lost due to the widening of Dillingham Boulevard.

Concern #C-2: The DEIS' focus on the impacts of full acquisition of properties (i.e., change in land use, need for relocation) fails to acknowledge the impacts of partial acquisitions.

The DEIS notes (page 4-20) that "Based on the relatively small number of parcels affected by full acquisition, the effects on different types of land uses in the study corridor would be minimal. No mitigation measures would be needed." As documented in the *Land Use Technical Report* (Pages 4-9 through 4-15), KS expressed its concern that the proposed Project's land acquisitions, including multiple partial acquisitions, may limit KS' ability to maximize the development potential of its properties.

Concern #C-3: The DEIS fails to consider sufficiently the impacts of the Project on documented future developments.

- The *Land Use Technical Report's* discussion of transit station land use impacts (pages 5-2 to 5-11) acknowledges that KS owns many properties near the proposed Kalihi, Kapalama, Kaka'ako, and Mo'ili'ili stations and has major redevelopment plans when current leases expire. **The potential impacts of the proposed transit project on these documented plans for redevelopment are not analyzed in either the Technical Report or the DEIS. This is a serious deficiency, which should be corrected in the FEIS.**

- Table A-17 of the *Land Use Technical Report*, which summarizes land use issues associated with the proposed Kalihi transit station, states that the City would "coordinate with Kamehameha Schools regarding redevelopment plans." The City should address these issues with KS prior to completion of the FEIS. Until such coordination is concluded, the City cannot claim that it has mitigated specific land use issues at least with respect to communities where KS owns substantial acreage at or near the proposed rail line.

- Table A-18 of the *Land Use Technical Report*, which summarizes land use issues associated with the proposed Kapalama station, acknowledges that "Kamehameha Schools owns much property west of" Honolulu Community College (HCC), and that "redevelopment possibilities exist a few blocks east and west." Section 3 of Table A-18, under *Refinements to Plans to Improve TOD*, states that "Coordination with Honolulu Community College (HCC) will be necessary to create strong pedestrian connection to College buildings to enhance ridership." **To not include coordination with Kamehameha Schools is a serious deficiency. KS owns over 105 acres of land in Kapalama and has ownership of land on either side of Dillingham from Waikamilo Road to Kohou.**

- Table A-28 of the *Land Use Technical Report*, which summarizes land use issues associated with the proposed Mo'ili'ili station, acknowledges that KS is concerned that the height of the station will be at the 6th story of its planned building. The table also states that the City needs to coordinate with KS so the station and KS' plans "are compatible, particularly regarding pedestrian facilities." **Therefore, it is requested that the following mitigation measure be included in the FEIS:**

[4] See City and County of Honolulu Land Use Ordinance, Sections 21-6.10 through 21-6.140.

AR00003469

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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June 11, 2010 RT2/09-299126R

Ms. Betsy Lindsay
UltraSystems
16431 Scientific Way
Irvine, California 92618-4355

Dear Ms. Lindsay:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address comments regarding the above-referenced submittal:

A. *Transportation*

Comment A-1: Parking

- *The Pearl Highlands park-and-ride facility could be expanded upward with additional floors if more parking spaces are needed. This would be decided after the entire Project is in operation and if demand warrants the additional parking spaces at this facility. While there are 4,100 spaces identified as part of the Project, the experience with park-and-ride facilities in Honolulu to date is limited. They have been generally underused. The facilities contained in the Project are located toward the Ewa end of the route and are based on consideration of parking demand using the travel demand*

forecasting model for the year 2030. Further, the projected mode of access shares was compared to observed data from several Mainland areas, notably San Diego.

- *Given the history of park-and-ride use on the island, it seems prudent to evaluate any need for additional or larger facilities on the basis of empirical experience rather than commit substantial additional funding now. The Kapalama Station will have relatively low ridership when compared to the guideway system average (as shown in Figure 3-10 in the Draft EIS). This station is primarily a destination and, accordingly, more people will get off the train at this station during the a.m. two-hour peak period than board. The travel demand forecasting model has been refined since the Draft EIS was published to account for non-home-based direct-demand trips (trips that do not originate or end at home) during off-peak periods. In addition, the air passenger model (which forecasts travel in the corridor related to passengers arriving or departing at Honolulu International Airport) was updated to reflect current conditions. Figure 3-9 in the Final EIS presents the revised peak-period ridership numbers for each station. As noted in Chapter 2, Section 2.5.7 of the Final EIS, a park-and-ride facility will not be included at the Kapalama Station. As stated in this section, park-and-ride facilities will be constructed at stations with the highest demand for drive-to-transit access. As shown in Table 3-22 in the Final EIS, the Kapalama station does not have high projected parking demand. Given the high quality service and passenger facilities provided at stations, the potential walk market is within one-half mile of the station as compared to the one-quarter mile noted in the comment. Most demand is expected to occur by walking, biking, or taking the bus to the station (as seen in Table 3-20 in the Final EIS). Less than 1 percent of mode of access to this station will require parking. As noted in Section 3.4.4 of the Final EIS, actual spillover parking at stations will be affected by several factors, such as availability of parking, changing conditions that will affect actual access to stations, and future development in station areas. As shown in Table 3-22 in the Final EIS, the projected demand for spillover parking at Kapalama Station is very low. Mitigation measures will be proposed at that time to alleviate the effects of spillover parking in station areas if it develops.*

- *Section 3.4.4 and Table 3-24 of the Final EIS identified potential effects of the Project on parking, including the 26 off-street parking spaces that will be lost on Dillingham Boulevard between McNeill Street and Waiakamilo Road. Section 3.4.7 of the Final EIS states that private, off-street parking spaces will be purchased for the Project as part of right-of-way needed along the length of the corridor in accordance with the requirements of the Federal Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970. All landowners will be paid fair-market value for the land, including the value of the parking spaces. Where landscaping, sidewalks, and driveway access will be affected by the Project, coordination will occur with the landowner, and these property features will be replaced and/or the property owner will be compensated in accordance with the Federal Uniform Relocation Assistance and Real Property Acquisition Policies Act. The City does not plan to generally replace all of the private, off-street parking purchased and removed for construction of the Project. However, with the Project the need for such parking demand is reduced.*

- *Section 3.4.4 and Table 3-24 of the Final EIS identified potential effects of the Project on parking, including the 10 off-street parking spaces that will be lost on Dillingham Boulevard between Waiakamilo Road and Kohou Street. Section 3.4.7 of the Final EIS states that private, off-street parking spaces will be purchased for the Project as part of right-of-way needed along the length of the corridor in accordance with the requirements of the Federal Uniform Relocation Assistance and Real Property Acquisition Policies Act. All landowners will be paid fair-market value for the land, including the value of the parking spaces. The City does not plan to generally replace all of the private, off-street parking purchased and removed for construction of the Project. As stated above, the need for such parking will be reduced with the Project.*

- *Table 3-24 of the Final EIS identifies effects of the Project on parking, including on-street spaces that will be lost on Halekauwila Street. Please note that the Project no longer plans to remove any parking between Keawe and Coral Streets. Section 3.4.7 of the Final EIS states that in locations where parking will be removed by the Project, other parking capacity generally exists nearby to accommodate demand. The cumulative and indirect effect of removing parking spaces to accommodate the Project will be that some people who parked in those spaces will either use another space nearby, will choose another mode to reach their destination, or will not make the trip.*

- *As stated previously, the experience with park-and-ride facilities in Honolulu to date is limited. They have been generally underused. Given the history of park-and-ride use on the island, it seems prudent to evaluate any need for additional or larger facilities on the basis of empirical experience rather than commit substantial additional funding now. Any need for additional parking at the four stations with park-and-ride facilities would best be determined once experience is gained about their use. Regarding the facilities that are identified, Chapter 6 of the Final EIS includes standard cost categories for the Project, including stations, stops, terminals, and site work and special conditions. Cost estimates for park-and-ride facilities are included in the sitework and special conditions category shown in Table 6-1 in the Final EIS. Ongoing operating and maintenance costs include park-and-ride facilities at stations (see Section 6.4 of the Final EIS). Any funding needed for future park-and-ride extensions would be identified at the time those extensions are constructed.*

- *Your comments on additional mitigation measures for parking have been noted. The park-and-ride structures can be designed to accommodate upward expansion if needed. The Project will not acquire more property than what is needed. Given the history of park-and-ride usage, the purchase of additional land is not warranted until there is a verifiable need.*

Comment A-2: Traffic Lane Width

- *While Table 3-21 in the Draft EIS does not report the specific width of travel lanes under the No Build Alternative, the width of traffic lanes was considered as an information item in the level-of-service analysis. With regard to potential safety-*

related effects of reduced lane widths, a USDOT study found slightly higher accident rates associated with narrower travel lanes and shoulders[1]. However, all roadway widths will meet the standards of the American Association of State Highway and Transportation Officials (AASHTO), the Hawaii Department of Transportation (HDOT), and the City.

- *Truck traffic volumes will be considered during Final Design when determining lane widths. As discussed in Section 3.4.3 of the Final EIS, in some cases, lane widths that are wider than indicated in Table 3-21 in the Final EIS may need to be provided, although 11-foot through lanes and 10-foot turn lanes are commonly used throughout the U.S. Under any circumstances, the proposed lane widths meet AASHTO and HDOT standards and will not be a hazard for larger trucks.*

- *As stated in Section 3.4.3, during Final Design the relationship of travel lanes, shoulders, sidewalks, and horizontal clearances to obstructions such as columns will be considered together in determining the final widths of each item. As noted earlier, some lane widths could increase from what is shown in Table 3-21 in the Final EIS. Permits for construction will not be approved unless a roadway facility that is safe and acceptable to the responsible transportation agency is provided. Sidewalks will meet Americans with Disabilities Act (ADA) requirements and provide a safe travel environment for users.*

Comment A-3: Park-and-ride Effects

- *With the Project, deterioration of level-of-service (LOS) will occur near some station areas. Project mitigation measures are designed to reduce the negative impact to a level that meets or surpasses 2030 No Build conditions. For example, Table 3-23 in the Final EIS shows that the level-of-service at Kamehameha Highway and Kuala Street is projected to remain at LOS F under the No Build Alternative and the Project. With mitigation measures to be implemented with the Project, including street widening and installation of signals, this intersection is projected to remain at LOS F during the p.m. peak hour and improve to LOS B during the a.m. peak hour. The average delay in seconds during the p.m. peak hour with this mitigation will be lower than that of the No Build Alternative. An impact is considered mitigated if the delay and level-of-service are improved or will be the same as the No Build Alternative. As shown in Table 3-23 in the Final EIS, the p.m. peak hour level-of-service at Farrington Highway (Ewa-bound) and Waiawa Street would decline from LOS D under the No Build Alternative to LOS F with the Project. At this location, mitigation measures include installation of signals, which will be synchronized with adjacent signals at Farrington Highway (Koko Head-bound) and Waiawa Street. With mitigation, this intersection is projected to operate at LOS B. The mitigation measures identified in Section 3.4.7 of the Final EIS and incorporated into the Project will fully mitigate the identified traffic impacts; therefore, additional mitigation measures will not be required.*

[1] U.S. Department of Transportation, December 2000, Prediction of the expected safety performance of rural two-lane highways.

- *As discussed in Section 3.4.3 and 3.4.7 of the Final EIS, mitigation measures for intersections near the Pearl Highlands station include widening Kamehameha Highway and modifying signal timings, and improved access to the H-2 Freeway near the Pearl Highlands Station. As shown in Table 3-23 of the Final EIS, these mitigation measures will reduce the delay at the intersections around Pearl Highlands.*

- *As stated in Section 5.4.5 of the Honolulu High-Capacity Transit Corridor Project Transportation Technical Report (RTD 2008) and Addendum 02 to the Transportation Technical Report, new bus connection service will be provided to Central Oahu and North Shore communities as part of the design for the Pearl Highlands Station. Service will include feeder buses to Koa Ridge, Waiawa, and other enhanced limited-stop and peak-period express services serving Central Oahu and the North Shore. Appendix D in the Final EIS includes information on future bus routes and frequencies with the Project. These new feeder bus services are planned to provide alternative access to the guideway system. Additional mitigation measures are not needed because all project-related impacts will be fully mitigated by the measures outlined in the Final EIS and incorporated into the Project.*

B. *Safety and Security*

According to the FTA's Safety Management Information Statistics for 1997, the most recent data available in the Transportation Research Board's Report, Improving Transit Security, there was one serious offense for every one million passenger miles carried on rail. There is a need for security on transit systems, just as there is a need for police and other security in all aspects of modern society, but there is no evidence that crime rates associated with transit are any higher than for society in general and no indication that any particular issues will be created in the areas listed.

Stations will be patrolled by police, transit staff, and/or private security and will be closed at night when the system is not in operation (between midnight and 4:00 a.m.). Additionally, as stated in Section 2.5.4, of the Final EIS, security cameras that are monitored at all times of operation, audible and visual messaging systems, and an intercom link to the system operations center will also be included at all stations, park-and-ride facilities, and vehicles. The system will also include park-and-ride facilities with security and lighting. The City is working with the Honolulu Police Department to develop the system's safety and security program. As discussed in this section, security measures will include Crime Prevention through Environmental Design (CPTED) principles, which is a theory that proper design and effective use of the built and natural environments can reduce the fear and incidence of crime as well as improve the quality of life. CPTED measures ensures that spaces are visible, open, well-lit and observable to minimize crime and will be incorporated at all stations. The City will provide maintenance to the guideway and transit facilities.

As further stated in Section 2.5.4, a project-specific Safety and Security Management Plan has been developed in accordance with FTA requirements to define the safety and security activities and methods for identifying, evaluating, and resolving potential safety

hazards and security vulnerabilities of these systems. It establishes responsibility and accountability for safety and security during the Preliminary Engineering, Final Design, construction, testing, and start-up phases of the Project. The Honolulu Police Department, the Honolulu Fire Department, the Department of Emergency Management, and the Honolulu Emergency Services Department have been involved in preparing and implementing the plan.

C. *Land Use*

Comment C-1: Dillingham Boulevard

- *As stated in Section 4.4.3 of the Final EIS, "Where relocations (either full or partial) will occur, compensation will be provided to affected property owners, businesses, or residents in compliance with all applicable Federal and State laws and will follow the Federal Uniform Relocation Assistance and Real Property Acquisition Policies Act." DTS will work with land owners if nonconformities occur as a result of acquisitions. For instance, minimum requirements on existing or future uses (i.e., parking requirements or setbacks) could be reduced if nonconformities occur. DTS will work with the property owner to address these concerns.*

- *As mentioned above, off-street parking on Dillingham Boulevard will be affected by the Project, as documented in Table 3-24 in the Final EIS. The City does not plan to generally replace private, off-street parking purchased and removed for construction of the Project. The City does not plan to generally replace all of the private, off-street parking purchased and removed for construction of the Project. As mentioned above, the Project will help reduce the need for such parking.*

Comment C-2: Partial Acquisitions

Please see the response for the item above. In addition, Section 4.4 of the Final EIS addresses both full and partial acquisitions.

Comment C-3: Future Development

- *The planned and reasonably foreseeable actions in the study corridor are provided in Table 4-36, in Chapter 4 of the Draft EIS and as Table 4-39 in the Final EIS and in Figure 4-2 of the Final EIS. Table 4-29 in the Final EIS includes Kamehameha Schools redevelopment plans. The assessment of their impacts, both indirect and cumulative, is presented in Sections 4.18.2 and 4.18.3 of the Draft EIS and Section 4.19 of the Final EIS. The assessment of cumulative impacts followed Federal guidance, specifically the Council on Environmental Quality's Considering Cumulative Effects under NEPA.*

- *As presented in Section 4.2.3 of the Final EIS, "Based on the relatively small number of parcels affected by full acquisition, the effects on different types of land uses in the study corridor will be minimal. No mitigation measures would be needed." Project staff met with Kamehameha Schools on December 8, 2008 to discuss effects of the*

Project on all Kamehameha Schools' owned properties, including those near the Kalihi and Kapalama stations. As a result of the December 8, 2008 meeting, a follow up presentation was held for Kamehameha Schools and their tenants on December 18, 2008. City staff has continued communication with Kamehameha Schools, Commercial Assets Division regarding right-of-way impacts and the EIS. Coordination between the City and Kamehameha Schools will continue during project design and construction. Any mitigation required as a result of Kamehameha Schools' redevelopment plans will be developed during their redevelopment-specific impact analysis that would be performed prior to redevelopment.

- *Please see the previous response regarding coordination between the City and Kamehameha Schools regarding redevelopment plans at the Kapalama Station. As stated previously, coordination will continue.*

- *The Project includes construction of an elevated fixed guideway from East Kapolei to Ala Moana Center. A station at Moiliili could be constructed as part of future extensions. Coordination with Kamehameha Schools would occur when planning for that station occurs.*

D. Visual/Aesthetics/Street Trees

Comment D-1: Viewer Groups

The definition and description of viewer groups is provided in Section 3.1.4 of the Honolulu High-capacity Transit Corridor Project Visual and Aesthetic Resources Technical Report (RTD 2008). The following is an explanation of the terms "viewer exposure" and "sensitivity." Viewer exposure refers to the view groups' physical location, the relative number of people exposed to the view, and the duration of their view. This includes transit and highway users and people in the surrounding area. Viewer sensitivity refers to a group's expectations relative to a particular visual setting in a particular area. It is also the extent to which visual elements are important to the viewer group. Viewer sensitivity is affected by a variety of factors, including the activities a viewer in engaged in; the visual context; and their values, expectations, and interests. The assessment of visual effects in Section 4.8 of the Final EIS has considered that each viewer group, including business owners, customers, and employees, are important (see "Viewer Groups," in Section 4.8.2 of the Final EIS). The methodology for the visual assessment is detailed in Section 4.8.1 of the Final EIS. In addition, each viewer group's characteristics were considered in the assessment of visual effects for each of the viewpoints described in Table 4-9 in Section 4.8 of the Final EIS. The effects, which are noted as low, moderate, or significant, also consider each viewer group's location, duration, and distance. As stated in Section 4.8.3 of the Final EIS, in response to the viewer groups' responses, received during the Draft EIS comment period, further analysis of views and vistas has been done and the visual effects of several key views have been reevaluated.

Comment D-2: Views from Adjacent Buildings

- *Your letter accurately summarizes the visual impacts of the Project on adjacent property owners. The Project has selected a landscape architect that has prepared landscape architecture design criteria. Included in the design criteria are four color palettes that correspond to the four major geographic areas along the project alignment: Plains, Pearl Harbor Basin, Airport, and Coastal.*

- *Further, the City and County of Honolulu is conducting workshops with communities that will have rail stations. The purpose of the workshops is to engage the public about rail stations and provide opportunities to residents to contribute ideas about the appearance of station entryways in their areas. Ideas generated at the workshops will be incorporated into the station planning process. For more information and to get involved in this process, please visit the project website at www.honolulutransit.org.*

Comment D-3: Mitigation

The assessment of visual effect due to the Project as described in Section 4.8.3 of the Final EIS considers changes to the visual landscape and viewer responses to those changes. This includes the existing development along the Project alignment. Within the Project corridor the environment changes from rural at the Waianae end of the corridor to dense high-rise development at the Koko Head end.

As part of the design process, the City has developed design principles, which are identified in the Honolulu High-Capacity Transit Corridor Project Compendium of Design Criteria (RTD 2009m) that will be implemented in final design to minimize visual effects of the Project. For example, guideway materials and surface textures will be selected in accordance with generally accepted architectural principles to achieve effective integration between the guideway and its surrounding environment. Landscape and streetscape improvements will mitigate potential visual impacts, primarily for street-level views.

Other measures to address visual impacts of the Project are being developed through the station design and planning process. The initial station area plans and design guidelines were first developed with coordination between DTS and the Department of Planning and Permitting (DPP). The next level of transit station design focuses on integrating individual neighborhood characteristics of the communities served by the stations.

The following mitigation framework will be included in the Project to minimize negative visual effects and enhance the visual and aesthetic opportunities that it creates:

- *Develop and apply design guidelines that will establish a consistent design framework for the Project with consideration of local context.*
- *Coordinate the project design with City TOD planning and DPP.*
- *Consult with the communities surrounding each station for input on station design elements.*
- *Consider specific sites for landscaping and trees during the final design phase when*

plans for new plantings will be prepared by a landscape architect. Landscape and streetscape improvements will serve to mitigate potential visual impacts.

Section 4.8.3 of the Final EIS, Design Principles and Mitigation includes information related to the mitigation framework described above. Specifically architecture and landscape design criteria include guidelines regarding site design, materials and finishes, and lighting, which apply to stations, station areas, and the guideway.

Even with mitigation measures, some obstruction and changes to views will result in a high level of visual impact, or, a significant impact, and changes to some views will be unavoidable. These effects will be most noticeable where the guideway and stations are nearby or in the foreground of views.

The following bullets correspond to those in your letter under Comment D-3:

- *Regarding TOD, the Project is focused exclusively on the construction and implementation of rail transit service, which is analyzed in the Draft and Final EISs. However, as discussed in Section 4.19.2 of the Final EIS, transit-oriented development (TOD) is expected to occur in station areas as an indirect effect of the Project. The increased mobility and accessibility that the Project will provide will also increase the desirability and value of land near stations, thereby attracting new real estate investment nearby (in the form of TOD). Planning and zoning around station areas will be established and conducted by DPP under a process covered by the City's new TOD Ordinance 09-4. The TOD special districts will encourage public input into the design of TOD neighborhood plans to reflect unique community identities. Information on the TOD process is available on DPP's website (http://honoluludpp.org/planning).*

- *The Design Pattern Guidebook is a design document, not an environmental analysis document, and is therefore not included in the Final EIS. It is available for review at the DTS office. The Guidebook reflects the sense of place in Hawaii. The guidebook is intended to create a design that is aesthetically appropriate as well as functional.*

- *DTS has developed specifications and design criteria to address the City's requirements for the Project. Guideway materials and surface textures will be selected in accordance with generally accepted architectural principles to achieve effective integration between the guideway and its surrounding environment. Landscaping and streetscape improvements will mitigate potential visual impacts.*

- *The station area planning process will include public design workshops for each station area, as stated above.*

- *As stated previously, the specifications and design criteria developed by DTS address the scale and character of the Project. In addition, the ongoing station area planning process involves numerous aspects of transit system design. The planning process addresses design and planning issues in an integrated manner and focuses on the characteristics and preferences of the communities adjacent to each station.*

- *As stated in Section 2.5.5 of the Final EIS design criteria developed for stations place the highest emphasis on walk and bicycle access. The Design Criteria provide specific direction for pedestrian and bicycle access features at stations. For example, the criteria state that adequate pedestrian circulation routes shall be provided with an emphasis on avoiding pedestrian and vehicular conflicts and enabling good visibility to each station entrance. This emphasis will be complemented by distinct and clear graphic signage. For bicycle access, the criteria include language stating that racks shall be placed at the station plaza near the station entrance where public visual surveillance is possible and/or where closed circuit television monitoring is present.*

- *The Project's landscape architect has prepared the landscape architecture design criteria. Included in the design criteria are four color palettes that correspond to the four major geographic areas along the project alignment: Plains, Pearl Harbor Basin, Airport, and Coastal. Topography is included in the visual landscape. The Project will include design features, including building materials and landscaping, that will allow the Project to fit the topography and visual setting of the area. For instance, Section 4.8.3 of the Final EIS states that "Stations and park-and-ride facilities will be designed in a manner that is compatible with the surroundings."*

- *Chapter 25 of the design criteria is dedicated to the safety and security of the system. Guideway materials and surface textures will be selected in accordance with generally accepted architectural principles to achieve effected integration between the guideway and its surrounding environment. Where the guideway columns fall within curbed areas, vines will be trained onto columns to reduce the possibility of graffiti and to soften the appearance of the structures.*

- *The design criteria also address materials that reflect Hawaiian culture. Specialty stations will be designed with respect to historic context and careful design to reinforce the uniqueness of context or use (e.g., the Kapalama Station might have a special planting of true kamani trees). The physical form of the project stations and support facilities will embody Honolulu and Hawaii's rich cultural heritage.*

- *The Project's landscape architect has prepared the landscape architecture design criteria, which includes the following goal regarding trees: "Transplant as many trees as possible displaced by the guideway to other areas of the Project that will be part of the first phase of construction or will otherwise not be disturbed by later construction." The design criteria also require the following: "Street tree planting or transplanting will occur adjacent to the station area and along the alignment where the existing streetscape is affected. Trees should be placed every 50 feet where adjacent to residential areas and every 40 feet where adjacent to commercial areas. Tree species, sizes, and details must conform to City standards." Street tree pruning, removal and planting will comply with City ordinances and will require that a certified arborist manage the pruning of any Exceptional trees.*

- *The station design goals include the following regarding the reduction of light pollution:*

1. Minimize light trespass from the building and site; reduce sky-glow to increase night sky access; improve nighttime visibility through glare reduction; and reduce development impacts on nocturnal environments.

2. Only provide lighting for areas that is required for safety and comfort; all non-emergency interior lighting shall be automatically controlled to turn off during non-business hours; provide manual override capability for after-hours use.

- *Criteria have been developed that will guide design of project elements. As indicated in Section 4.6.3 of the Final EIS, ongoing coordination efforts with the public will help develop design measures that will enhance the interface between the transit system and the surrounding community. The extent, nature, and location of these design measures will be determined through these coordination efforts.*

- *The measures listed in D-3 under the "construction-related mitigation" bullet of your letter are generally included in DTS's Standard Specifications for construction.*

- *It is acknowledged that the guideway and stations will noticeably contrast with smaller-sized buildings and change the character of some areas. In addition, some views Downtown and in other areas, including protected views, will be blocked, and some views will change substantially. However, the design criteria discussed in Section 4.8.3 of the Final EIS states that station designs will be context-sensitive, functionally integrated, and culturally expressive of their specific locations and where there is an opportunity, the guideway design will incorporate materials, landscaping etc. to enhance the visual environment. Overall, the Project will be set in an urban context where visual change is expected and differences in scales of structures are typical. Noticeable changes to views will occur where project elements are near existing views or in the foreground of these views.*

Comment D-4: Street Trees

- *Street trees along the project alignment are discussed in Section 4.15 of the Final EIS. Effects to street trees will be mitigated by transplanting existing trees to areas as close to their original location as feasible or planting new ones. More detail on mitigation measures is discussed in Section 4.15.3 of the Final EIS. Specific sites for relocating trees will be considered during Final Design when plans for new plantings are prepared by a landscape architect.*

- *In addition to transplanting existing trees, plans for new plantings will be prepared by a landscape architect during Final Design to further mitigate effects to street trees. To mitigate any substantial effects in areas that require tree removal, special attention will be given to developing landscaping plans so that new plantings will provide similar advantages to the community. If new plantings will not offer equitable mitigation (e.g., older mature trees that are removed), additional younger trees could be planted that will, in time, develop similar benefits.*

- *Trees that do not successfully transplant will be replaced by the contractor according to the terms of the construction contract documents. Monitoring requirements for successful restoration will be in the landscaping plan set; the responsibility is typically shared between the contractor and the owner.*

- *The details regarding specific trees planted in specific geographic areas are controlled by the landscape architecture design criteria. As indicated in Section 4.15 mitigation effects to street trees will be mitigated by transplanting existing trees to areas as close to their original location as feasible or planting new ones. Among the trees that require removal but could be transplanted are most of the trees along Farrington Highway. The location where street trees will be transplanted will be selected based on project specific criteria that could include the following:*
  - *Areas where existing landscaping will be lost along the study corridor*
  - *Areas where opportunities exist for enhancing existing streetscapes near the study corridor*
  - *Areas where stations and parking lots will be constructed*
  - *Areas where shared benefits will be accomplished, such as areas adjacent to parks or historic sites*

  Street tree pruning, removal, and planting will comply with City ordinances and will require that a certified arborist manage the pruning of any Exceptional trees. Trees suitable for transplanting displaced by construction will be relocated to a City project nursery until they can be transplanted to another part of the project area. The City will coordinate with HDOT's highway landscape architect. In addition to transplanting existing trees, plans for new plantings will be prepared by a landscape architect during final design to further mitigate effects to street trees. To mitigate any substantial effects in areas that require tree removal, special attention will be given to developing landscaping plans so that new plantings will provide similar advantages to the community. If new plantings will not offer equitable mitigation (e.g., older mature trees that are removed), additional younger trees could be planted that will, in time, develop similar benefits.

E. Noise and Vibration

Comment E-1: Noise Analysis

The noise analysis followed FTA guidance and is documented in the Honolulu High-capacity Transit Corridor Project Noise and Vibration Technical Report (RTD 2008). The results of the predicted project noise exposure levels are presented in Appendix A of this technical report. The technical report is available at libraries, from DTS, and on the project website at www.honolulutransit.org.

The methodology followed and the identification of sensitive noise receptors does not include commercial land uses as they are not noise-sensitive receptors. The FTA Noise Impact Criteria group noise-sensitive land uses into the following three categories:

Category 1: Buildings or parks where quiet is an essential element of their purpose.

Category 2: Residences and buildings where people normally sleep. This includes residences, hospitals, and hotels where nighttime sensitivity is assumed to be of utmost importance.

Category 3: Institutional land uses with primarily daytime and evening use. This category includes schools, libraries, theaters, and churches where quiet is important.

Comment E-2: Commercial Land Uses

Impacts were evaluated to resources in these categories. Industrial and many commercial uses are not noise-sensitive. State of California guidelines are not applicable to projects in Hawaii.

Comment E-3: Noise Mitigation

As discussed in Section 4.9.1 of the Draft EIS, "Moderate noise impacts also require consideration and adoption of mitigation measures when it is reasonable." During Preliminary Engineering additional measures were evaluated. As stated in Section 4.10.3 of the Final EIS, with the recommended mitigation in place (sound absorbing material and wheel skirts), the noise analysis indicates that the new noise generated by the Project will be lower than the existing noise levels in most places. The use of these materials will mitigate all anticipated noise impacts, including those at upper building floors.

F. *Construction Impacts*

Comment F-1: Farrington Highway

As discussed in Chapter 3, Section 3.5.7 of the Final EIS, a Maintenance of Traffic Plan (MOT) will identify measures to mitigate temporary construction-related effects on transportation. The contractor will develop the MOT Plan with approval from the City and the Hawaii Department of Transportation. The MOT Plan will address roadway closures for streets identified in Table 3-27 of the Final EIS, including those listed in your letter (specifically Farrington Highway between Makamaka Place and Waipahu Deport Road). An analysis of the impacts on local businesses is not anticipated as part of the MOT Plan. However, as stated in Section 4.18 of the Final EIS, access to businesses will be maintained during construction and a public involvement plan will be developed prior to construction to inform business owners and the public of the construction schedule and activities.

Comment F-2: Access to Residences and Businesses

The Final EIS includes commitments to maintain business access during construction. Requirements on the contractors to maintain access will be established through contract specifications. These measures will be considered during the development of the specifications.

The mitigation measures proposed on pages 10-13 of your letter, unless specified otherwise below, will be utilized as part of the Project and contained within contract documents and special provisions.

- *The City will not provide direct financial assistance to mitigate temporary impacts during construction to businesses. Where acquisition of property will occur, compensation will be provided to affected property owners, businesses, or residents in compliance with all applicable Federal and State laws and will follow the Federal Uniform Relocation Assistance and Real Property Acquisition Policies Act.*

- *DTS developed a community involvement plan for the Project that includes community-based staff that will work with neighborhood groups, residents, and businesses in each segment of the Project corridor. Representatives will visit businesses in each area to discuss the Project and take comments and answer questions. The MOT Plan and other construction-related plans will also be developed to minimize the impact construction will have on businesses.*

- *Every public involvement activity referenced in your letter will be undertaken during construction. An overall community involvement plan has been developed for the Project that details communications between the Project and the public. In addition, contractors hired for each construction segment will have a field office and will be required to meet with residents and businesses in the community and report to the DTS. The DTS and its contractor will jointly form a neighborhood-based plan of action to engage businesses throughout the process. The DTS sends monthly updates to the FTA regarding public involvement activities, which will continue throughout construction.*

- *The Final EIS includes commitments for community information during construction. The community information program will work with the individually affected communities. Some elements suggested for the Business Disruption Mitigation Plan, such as having a staff person work directly with the public and property owners to resolve construction-related problems, will be part of the MOT Plan or public information program. The DTS will work with all adjacent property owners and their tenants during construction to minimize disruption to local businesses.*

- *The Final EIS includes commitments to maintain business access during construction. Requirements on the contractors to maintain access will be established through contract specifications.*

- *Project construction does not entail cut and cover segments. As a result, the mitigation proposed in your letter for cut and cover activity is not applicable.*

- *As stated in Chapter 3, Section 3.5.5 of the Final EIS, access to existing bicycle and pedestrian facilities will be maintained during all phases of construction as safety allows. Warning and/or notification signs of modification to bicycle and pedestrian facilities during construction will be provided. Proposed pedestrian detours will be submitted to the City for review and approval to ensure they are reasonable for all*

pedestrians and meet ADA regulations. Sidewalk widths after construction is completed are shown in Table 3-25 of the Final EIS. All sidewalk widths will comply with minimum width requirements or better.

Comment F-3: Safety and Security Plan

The City has prepared a Construction Safety and Security Manual that requires the contractor to adhere to safe construction practices. Each contractor will be required to develop a Safety and Security Plan for areas within their responsibility. The Plan will be reviewed and accepted by the City. The Safety and Security Plan will include the costs associated with those security measures.

Comment F-4: Traffic Control

Traffic control during construction is the responsibility of the contractor. The contractor will follow the MOT Plan during construction. The MOT Plan is prepared through close coordination with the City and the Hawaii Department of Transportation. As stated in Section 4.18.2 of the Final EIS, construction in high-volume traffic and pedestrian areas could employ police support to direct and control traffic and pedestrian movements to lessen effects on mobility. Safety and Security plans have been developed in coordination with Honolulu Police Department (HPD) and HPD has provided assurances that they have sufficient staff to control and direct traffic when needed. This would be funded by the Project.

Comment F-5: Electric Power and Telephone Service

As presented in Section 4.18.2 of the Final EIS, "Design criteria will govern all new utility construction outside of buildings, as well as the support, maintenance, relocation, and restoration of utilities encountered or affected by project construction." HDOT will be involved with utility coordination for utility work in state roadways and roadway rights-of-way. The design criteria for utilities are currently contained within Chapter 8 of the Design Criteria prepared as part of the contact documents. In addition, the General Conditions require coordination with property owners regarding, but not be limited to, underground utility service connections, access or driveway reconstruction, utility disruption, water service, grounding work, demolition, landscape protection, landscape restoration, fencing, mail delivery, and garbage collection. This includes notifying and working with adjacent property owners regarding non-state roadways and roadway rights-of-way.

Comment F-6: Vertical Clearance on Dillingham Boulevard

The City has been working with Hawaii Electric Company (HECO) from the beginning of the planning and design work for this Project. All parts of the Project, including those on Dillingham Boulevard, will meet all clearance requirements for construction and maintenance of overhead cables. Given that construction will use overhead gantry systems for placement of the guideway, it will reduce the need for tall cranes. All construction systems will be properly insulated to ensure against any possible mishap.

Comment F-7: Air Quality during Construction

For the purposes of disclosure in the Final EIS, the air quality mitigation measures in Section 4.18.4 are sufficiently descriptive. As specified in this section, the Project must comply with the State of Hawaii's fugitive dust regulations, HAR 11-60.1-33, which provide more specific examples of mitigation measures. The contractor will select appropriate measures to comply with fugitive dust requirements. The following control measures will be considered to substantially reduce fugitive dust:

- *Minimize land disturbance*
- *Use watering trucks to moisten disturbed soil*
- *Use low emission equipment when feasible*
- *Cover loads when hauling dirt*
- *Cover soil stock piles if exposed for long periods of time*
- *Use windbreaks to prevent accidental dust pollution*
- *Limit the number of vehicular paths and stabilize temporary roads*

Comment F-8: Noise Mitigation during Construction

There will be temporary noise and vibration impacts during construction, as presented in Section 4.18.5 of the Final EIS. For the purposes of disclosure in the Final EIS, the noise and vibration mitigation measures presented in Section 4.18.5 are sufficiently descriptive. As stated in this section, the Project must obtain from the Hawaii Department of Health an approved community noise variance. The detailed mitigation commitments will be included in the community noise variance application and may include the measures proposed in the comment. The Hawaii Department of Health includes public involvement in establishing variance requirements.

G. *Indirect and Cumulative Effects*

As noted in Section 3.4.4 of the Final EIS, station areas with the highest estimated demands for spillover parking were at West Loch, Pearlridge, Iwilei, and Ala Moana Center. Table 3-22 in the Final EIS shows projected spillover parking demand near each guideway station. The Final EIS also notes that actual spillover parking at guideway stations will be influenced by several factors, such as availability of parking, changing conditions that will affect actual access to stations, and future development in station areas. As also noted in Section 3.4.2 of the Final EIS, ridership information for the Project is based on demand projections for 2030. The sizing of the system, including park-and-ride facilities, is based on this estimated long-term demand. When the Project is implemented, access to stations will be monitored. If park-and-ride access is higher than estimated, overall access will be reviewed, including approaches to increasing shares of other modes, such as local transit.

H. *Section 4(f) Analysis*

One parking space will be lost on the Boulevard Saimin parcel as a result of the Project. Kamehameha Schools will be compensated for this space in accordance with the Federal Uniform Relocation Assistance and Real Property Acquisition Policies Act.

I. Mitigation Measures

- *All mitigation commitments will be in the Final EIS, the Record of Decision, and permits (as appropriate), and will be incorporated into the Project's Final Design.*
- *DTS and the construction contractor will prepare a schedule for implementation of the environmental commitments. DTS's Environmental Compliance Manager will ensure that the environmental commitments are adhered to during construction.*
- *Mitigation measures required during construction of the Project will be included in the Record of Decision and included as requirements in the appropriate construction contract documents.*
- *As the City must approve the contractors' work, the City will ensure that contractors comply with all construction and mitigation requirements.*

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

The City and County of Honolulu shall coordinate with KS on the latter's plans to redevelop its lands near the Mo'ili'ili station in regards to the station's pedestrian facilities. Construction of this station shall not begin until this coordination has been completed and the appropriate pedestrian facilities have been included in the station's design.

D. Visual/Aesthetics/Street Trees

Construction of the transit project will create visual impacts on a number of KS-owned lands. It will also result in the removal of a number of significant street trees and other ornamental vegetation on KS lands, which will diminish the value of KS property and create significant aesthetic impacts due to changes in perception of KS property, loss of shade, screening from adjacent land uses, etc. Operation of the transit project will also create visual impacts on a number of KS tenants who will have views of the transit way and transit support columns.

Concern #D-1: The Visual and Aesthetic Resources Technical Report does not contain sufficient detail on the evaluation of impacts by "viewer groups.

The *Visual and Aesthetics Resources Technical Report* utilized the methodology of the Federal Highway Administration's (FHWA's) *Visual Impact Assessment for Highway Projects*,[5] for the proposed project since it is a linear transportation facility comparable to a highway, has a similar range of issues, and because the FTA has not issued comparable guidance. The FHWA guidelines (Page 7) state:

> "The major components of this process include establishing the visual environment of the project, assessing the visual resources of the project area, and identifying viewer response to those resources. These components define the existing conditions. We can then assess the resource change that would be introduced by the project and the associated viewer response; these allow us to determine the degree of visual impact."

The *Visual and Aesthetics Resources Technical Report* (Page 3-2), discusses how viewer groups have been categorized (i.e. residents, commuter, etc.) and indicates that viewer response to change is impacted by viewer exposure and viewer sensitivity. However, the analysis provided in Section 5.0 (Consequences) of the technical report contains few to no details regarding user group exposure to project alternatives for different user groups, including such factors as location, duration, and distance. **Please provide additional clarification regarding viewer exposure and viewer sensitivity for the selected view points.**

Concern #D-2: Numerous KS properties located adjacent to, or near the proposed fixed guideway system and stations would have their views impacted.

The Build Alternatives would have an elevated guideway and elevated stations throughout the study corridor. The support columns would range from 3 to 8 feet in diameter. All stations would have similar design elements, platforms that would be between 270 and 300 feet long, and a minimum of 10 feet wide. The Station height would be about 20 feet taller than the guideway. "As a result, the stations would be dominant visual elements in their settings and would noticeably change views. Systems elements for all technologies being considered would introduce new visual elements that may contrast with the existing environment's scale and character" (DEIS, Pages 4-93, 6-1 and 6-2).

- The *Visual and Aesthetics Resources Technical Report* (Page 6-1) recommends that, as a mitigation measure, project design should "incorporate elements of the Design Language Pattern Book being developed by the Project Team." KS would like to be consulted during development of the pattern book to help ensure that new stations and landscaping are compatible with existing land uses adjacent to the transit project. **Therefore, it is requested that the following mitigation measure be included in the FEIS:**

[5] Publication No. FHWA HI-88-054.

The City and County of Honolulu shall consult with KS in the development of the pattern book that will be used in designing stations and landscaping.

Page 6-1 of the *Visual and Aesthetics Resources Technical Report* notes that impacts associated with the Build Alternative could include:

- Removal or relocation of Exceptional Trees;
- Changes in the settings of historic or cultural sites or Section 4(f) resources;
- Alteration of mauka-makai views;
- Introduction of project components that are out of scale or character with their setting;
- Moderate to high viewer response to project changes;
- Introduction of new light sources in sensitive areas; and
- Inconsistency with policy documents.

Views of the Pearlridge and Kapalama stations from KS properties are of particular concern. Tenants of KS-owned lands near or adjacent to these stations will see stations looming over them. In addition, the stations may create shading problems on adjacent lands.

Concern #D-3: The mitigation measures for visual effects lack specifics.

FHWA's visual impact assessment guidelines state, "To be relevant, visual mitigation measures must address the specific visual impacts or problems caused by project alternatives." The currently proposed mitigation in the DEIS (Page 4-93) is very general and lacks specifics as to how the mitigation measures would reduce or minimize specific visual impacts. The discussion of mitigation fails to provide a nexus as to how mitigation would address the specific visual impacts from the proposed project. In addition, the mitigation identified in the Draft EIS does not indicate any measures to mitigate construction-related visual impacts. However, the *Visual and Aesthetics Resources Technical Report* does provide greater detail regarding principles to minimize, reduce, or mitigate impacts, including those related to construction. The FEIS should include no less than the following measures:

- The City and County of Honolulu shall integrate transit-oriented development policies and principles with station designs, in consultation with developers and City, County, and State agencies before any station designs are completed;
- The City and County of Honolulu shall, in the FEIS, include a copy of the Design Language Pattern Book being developed by the Project Team and incorporate the applicable elements of the Design Language Pattern Book into the design of transit stations and landscaping;
- The City and County of Honolulu shall ensure that the final project design is aesthetically appropriate—as well as being functional;
- The City and County of Honolulu shall consult with the communities surrounding each station for input on station design elements and shall reach an agreement with all stakeholders before finalizing the station design;
- The City and County of Honolulu shall create a project design that is appropriate in scale and character to its setting;
- The City and County of Honolulu shall incorporate project design components that help create a human-scale and pedestrian-friendly environment;
- The City and County of Honolulu shall use project design features with materials and shapes that fit the topography and visual setting;
- The City and County of Honolulu shall look for opportunities to use materials that minimize the potential for vandalism;

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- The City and County of Honolulu shall look for opportunities to use materials that reflect the Hawaiian culture;
- The City and County of Honolulu shall retain or replace existing street trees along sidewalks and in medians, and plant new vegetation to help soften the visual appearance of project elements (e.g., stations, guideway columns, and TPSSs);
- The City and County of Honolulu shall use source shielding in exterior lighting at stations and ancillary facilities such as the maintenance and storage facility and park-and-ride lots, to ensure that light sources (such as bulbs) would not be directly visible from residences, streets, and highways, and to limit spillover light and glare in residential areas;
- The City and County of Honolulu shall work with relevant adjacent land owners and developers to integrate project elements with area redevelopment plans as appropriate, particularly at stations; and
- Construction-related mitigation shall include the following:
    - Removing visibly obtrusive erosion-control devices (e.g., silt fences, plastic ground cover, and straw bales) as soon as an area has been stabilized;
    - Replacing street trees and other vegetation that must be removed with appropriately sized vegetation;
    - Keeping roadways as clean as possible by using street sweepers and wheel washers to minimize off-site tracking;
    - During dry periods, applying water to exposed soils to minimize airborne sediment;
    - Properly maintaining construction equipment to minimize unnecessary exhaust; and
    - Locating stockpile areas in less visibly-sensitive areas and, wherever possible, placing them in areas that are not visible from the road, or by residents and businesses.

The FEIS should provide site-specific mitigation measures for non-high-rise areas due to relatively higher visual impacts in order to adequately mitigate such impacts. This is particularly important for the Pearlridge and Kapalama stations, which would be developed near or adjacent to KS-owned lands.

Concern #D-4: The mitigation measures for removal of street trees are vague and inadequate.

The DEIS indicates that numerous street trees that would be pruned, removed, or transplanted as a result of any of the Build Alternatives. Of particular concern is the number of street trees that would be removed, including the 28 "notable" true kamani trees along Dillingham Boulevard, and how their removal would be mitigated. The mitigation provided on page 4-138 of the DEIS is vague and lacks specifics on this matter. Should street tree work such as pruning, removal or transplanting, not be done correctly, trees may become disfigured or die, creating a significant aesthetic impact on the project area, along with a need for corrective measures and their attendant costs.

- According to the DEIS, effects on street trees would be mitigated by transplanting existing trees or planting new ones. While relocating a street tree would retain the tree, the relocation of that tree would change its original environment. Therefore, more specific mitigation for areas to which existing trees would be relocated or removed is needed to ensure that these locations are appropriately mitigated. **Specifically, areas adjacent to and/or near KS properties requiring tree relocation or removal should be adequately mitigated.**

- What would happen in cases where the transplanted tree dies, as not all the proposed tree relocations may be successful? The mitigation on page 4-138 of the DEIS does not prescribe any post-transplant monitoring of relocated trees, nor does it provide any provisions for relocated trees that do not survive the transplant process.

- The DEIS contains little information on how mitigation would be determined in cases where tree removal would be required. As indicated on page 4-138 of the DEIS, "To mitigate any substantial effects in the areas that require removal, special attention would be given to developing landscape plans so that new

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plantings would provide similar advantages to the community. If new plantings would not offer equitable mitigation (e.g., older mature trees that are removed), additional younger trees could be planted that would, in time, develop similar benefits." Would younger trees be planted at a 1:1 ratio but older more mature trees at a higher ratio? Based on the information provided in the Draft EIS, it is unclear as to what criteria would be used to determine adequate quantities of new plantings to mitigate tree removal. The mitigation measures also do not indicate any monitoring of new plantings, or identify provisions should any of the new plantings die.

E. Noise and Vibration

The noise and vibration impact analysis in the DEIS and associated technical report is not adequately documented and does not address potentially important impacts upon commercial properties.

Concern #E-1: The noise analysis is not adequately documented.

Neither the DEIS nor the supporting technical report discusses the method by which noise levels due to the Project were calculated. It is likely that methods prescribed in FTA's *Transit Noise and Vibration Impact Assessment* manual[6] were used. Furthermore, the assumptions used to estimate noise attenuation due to the parapet wall and the wheel skirts for receptors higher than the guideway are not reported **The noise analysis in the FEIS needs to be fully documented and the assumptions and calculations need to be provided in an appendix, so that they may be checked.**

Concern #E-2: The noise analysis does not address potential impacts upon commercial land uses.

The DEIS uses the aforementioned FTA guidance's noise impact criteria as the standard against which to evaluate noise exposures due to the Project. The FTA criteria apply only for exposures to three categories of "sensitive" receptors. Category 1 includes land uses where quiet is essential, such as outdoor amphitheaters and recording studios. Category 2 includes residences and other places where people sleep. Category 3 is for "institutional land uses with primarily daytime and evening use," including schools, libraries, theaters, churches, historical sites, and parks. None of these category definitions includes, explicitly or implicitly, commercial operations. Furthermore, Hawaii State and local plans and regulations do not have standards for exposure of commercial receptors to transit noise. For this reason, the DEIS analysis did not consider impacts to commercial receptors. However, noise impacts to commercial receptors may be important in certain cases. This fact is recognized, for example, by the State of California in its *General Plan Guidelines*,[7] which include ranges of acceptable exposures for "office buildings, business commercial and professional" land uses. **It is requested that the FEIS consider the issue of noise impacts upon commercial land uses.**

Concern #E-3: The discussion of mitigation measures for noise impacts to sensitive receptors higher than the guideway is inadequate.

The noise analysis conducted for the DEIS found that "moderate" impacts (as defined by the Federal Transit Administration) would occur at several sensitive receptor locations, including some residences that are at higher elevations than the guideway (DEIS, Table 4-16). The DEIS does not specify any mitigation measures. Instead it says that "measures to reduce noise levels above the track elevation ... would be evaluated during preliminary engineering of the Project. Once the Project is operating, noise levels will be measured to determine the actual extent of project noise impacts." (DEIS, pp. 4-101 and 4-107) The nearly complete deferral of the description of mitigation measures to the project engineering design stage is not acceptable under NEPA. Although it is true that Project design information is needed to determine the best mitigation measure for each predicted impact, it is

[6] U. S. Department of Transportation. 2006. Federal Transit Administration. *Transit Noise and Vibration Impact Assessment.* FTA-VA-90-1003-06. May.

[7] State of California, *General Plan Guidelines.* Governor's Office of Planning and Research, Sacramento, California (2003).

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possible now to present at least a list of mitigation options that can reduce exposures to 45 or 50 dBA Ldn or below. A list of mitigation options should be included in the FEIS.

F. Construction Impacts

Construction of the transit project will create a number of impacts on KS lands along the transit corridor including interruption and/or temporary loss of access to businesses, potential temporary loss of utilities to businesses, temporary and/or permanent loss of on and off-street parking at KS businesses.

Concern #F-1: The DEIS does not adequately address left-turn closures on Farrington Highway in Waipahu during construction.

The DEIS (Page 4-153) states that left-turn lanes on Farrington Highway in Waipahu would be closed during construction. There are KS owned properties at the intersection of Farrington Highway and Waipahu Depot Road. The DEIS does not discuss the impact of the lane closures on traffic levels of the surrounding roads. It is believed that motorists will avoid the lane closure by using other alternate routes. The FEIS should include an analysis of the impacts on local businesses and KS tenants created by the closure of left-turn lanes on Farrington Highway in the Waipahu area, including the impacts of by-pass traffic. Mitigation, if necessary, should also be included in this analysis and included in the FEIS.

Concern #F-2: Proposed measures for maintaining auto access to residences and businesses during all phases of construction need to be made more specific. Additional measures are needed.

The ten mitigation measures to reduce adverse economic hardships for existing businesses along the project alignment during construction activities that are listed on page 4-154 of the DEIS should be included in the Maintenance of Traffic (MOT) Plan that would be developed by the Project construction contractor prior to construction of the Project. **However, as currently written in the DEIS, these measures are very vague and do not clearly indicate who will be responsible for implementing them. These measures should be revised to be no less than the following—and be included in the project FEIS:**

- The City and County of Honolulu, in concert with the project construction contractors, shall ensure by any necessary means that access to businesses in the project area shall be maintained during project construction activities.
- The City and County of Honolulu shall develop a public involvement plan prior to the beginning of project construction to inform business owners of the project construction schedule and activities throughout the project construction phase.
- The City and County of Honolulu shall initiate public information campaigns to reassure people that businesses are open during project construction activities to encourage their continued patronage throughout the project construction phase.
- The City and County of Honolulu shall minimize the extent and number of businesses, jobs, and access affected during project construction, by any means deemed feasible, throughout the project construction phase.
- The City and County of Honolulu, to the extent practicable, shall coordinate the timing of temporary facility closures to minimize impacts to business activities in the project area – especially those related to seasonal or high sales periods.
- The City and County of Honolulu shall minimize, as practical, the duration of modified or lost access to businesses in the project area, throughout the project construction phase.
- The City and County of Honolulu shall provide signage, lighting, or other information to indicate that businesses in the project area are open throughout the project construction phase.

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- The City and County of Honolulu shall provide public information (e.g., press releases or newsletters) regarding construction activities and ongoing business activities, including advertisements in print and on television and radio on the Island of O'ahu during the project construction period.
- The City and County of Honolulu shall coordinate with the project construction contractors the phasing of construction in each project construction area so as to maintain access to individual businesses for pedestrians, bicyclists, passenger vehicles, and trucks during business hours and important business seasons, throughout the project construction phase.
- The City and County of Honolulu, in concert with the project contractor, shall provide advance notice if utilities would be disrupted, during regular business hours and schedule major utility shut-offs during non-business hours.

The following additional mitigation measures to reduce this Project's impact on business access should be included in the Project FEIS.

- Prior to and during construction of the East Kapolei-Ala Moana Center Segment, the FTA and the City and County of Honolulu, Transportation Services, Rapid Transit Division (RTD) shall contact and interview individual businesses potentially affected by construction activities, and maintain appropriate records. Interviews with commercial establishments will provide FTA and RTD staff knowledge and understanding of how these businesses carry out their work, and will identify business usage, delivery, and shipping patterns and critical times of the day and year for business activities. Data gathered from these interviews will also assist the FTA and RTD as it works with the City & County of Honolulu Department of Facility Maintenance to develop the Worksite Traffic Control plans. Among other elements, these plans will identify alternate access routes to maintain critical business activities.

- The FTA and RTD shall establish a "Public Affairs Program" that will be responsible for implementing the following actions:

  ✓ Convey construction information to the community in a timely manner so as to minimize the potential disruption to businesses.

  ✓ Develop a process that will enable the community to "speak" to the FTA and RTD during construction that includes a specific mechanism for responding to community concerns in a timely manner.

  ✓ All FTA and RTD responses to community concerns shall be coordinated with the construction team.

- The FTA and RTD shall work with community residents, elected officials, local businesses, and community organizations to tailor the mitigation program to meet community needs in an East Kapolei-Ala Moana Center Segment Business Disruption Mitigation Plan (BDMP) prepared by FTA and RTD staff prior to the commencement of construction activities. A copy of the East Kapolei-Ala Moana Center Segment BDMP shall be placed in the East Kapolei-Ala Moana Center Project Information Field Office for public viewing. FTA and RTD shall inform the public of its progress in implementing the measures identified through a quarterly program of auditing, monitoring, and reporting. A quarterly status report shall be made available to the public. FTA and RTD shall appoint a staff person to work directly with the public to resolve construction-related problems.

The following mitigation measures should be minimum elements of the East Kapolei-Ala Moana Center BDMP:

1. It may be necessary to temporarily relocate immediately affected owners and occupants of businesses or provide a rent subsidy if, for example, access to the business could not be maintained or the business could not be operated in a normal manner. These options shall be explored by FTA and RTD staff if the need arises.

2. During construction of the project, FTA and RTD staff shall establish a project information field office located along the East Kapolei-Ala Moana Center Segment. The field office, in conjunction with other FTA and RTD staff, will serve multiple purposes, including:

   - ✓ Respond to and address community and business needs during the construction period,
   - ✓ Respond to complaints lodged by the public and construction claims,
   - ✓ Allow FTA and RTD to participate in local events in an effort to promote public awareness of the project,
   - ✓ Manage construction-related matters pertaining to the public,
   - ✓ Notify property owners, residences, and businesses of major construction activities,
   - ✓ Provide literature to the public and press,
   - ✓ Promote and provide presentations on the project via FTA and RTD's Speaker Bureau,
   - ✓ Respond to phone inquiries,
   - ✓ Coordinate business outreach programs,
   - ✓ Schedule promotional displays, and
   - ✓ Participate in community committees.

3. The project information offices shall be open various days of the work week for the duration of the construction period. A schedule shall be developed before project construction begins, shall be included in the East Kapolei-Ala Moana Center Segment Business Disruption Plan and shall be reported in the quarterly Mitigation Measures Status Report provided to the FTA.

4. An information and voice mail telephone line shall be available to provide community members and businesses the opportunity to express their views regarding construction. Calls received shall be reviewed by FTA and RTD staff and will, as appropriate, be forwarded to the necessary party for action (e.g., utility company, fire department, Resident Engineer in charge of construction operations). Information available from the telephone line shall include current project schedule, dates for upcoming community meetings, notice of construction impacts, individual problem solving, construction complaints, and general information.

5. The FTA and RTD shall provide multilingual advertisements for local print and radio for affected businesses, throughout the project construction phase. In addition, a multilingual construction update shall be available regularly throughout the community at least once a quarter. The languages for translation shall include, but not be limited to, English, Hawaiian, Tagalog, Japanese, Chinese, Korean, Ilokano, and Spanish.

6. The FTA and RTD shall provide affected businesses with the support needed to implement promotions to help maintain their customary level of business throughout the project construction phase.

7. The FTA and RTD shall work with establishments affected by the East Kapolei-Ala Moana Center Segment construction activities. Appropriate signage shall be developed and displayed by the FTA and RTD to direct both pedestrian and vehicular traffic to businesses via alternate routes.

8. Traffic management plans to maintain access to all businesses shall be prepared for all project construction areas.

9. Contractors shall clean work areas daily for the duration of the project construction phase.

10. Provisions shall be contained in project construction contracts to require the maintenance of driveway access to businesses to the extent feasible.

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11. To the extent feasible, in the East Kapolei-Ala Moana Center project segment, concrete decking along the cut-and-cover segments shall be installed flush with the existing street or sidewalk levels.

12. Wherever feasible, sidewalks shall be maintained at their current widths during project construction. Where a sidewalk must be temporarily narrowed during construction (e.g., deck installation), it shall be restored to its current width during the majority of the construction period. Each sidewalk design will be of good quality and be approved by the FTA and RTD Resident Engineer prior to construction. Handicapped access shall be maintained during construction where feasible. If handicapped access is not feasible during project construction, then alternative handicapped access shall be provided as necessary or signs indicating that such access is temporarily unavailable shall be displayed. Handicapped access that is temporarily closed due to particular project construction activities shall be reopened as soon as possible after those construction activities have been completed.

13. Construction site fencing shall be of good quality, capable of supporting the accidental application of the weight of an adult without collapse or major deformation. Fence designs or samples shall be submitted to the FTA and RTD Resident Engineer for approval prior to installation. Where major boulevards must be fenced, business owners shall be offered the opportunity to request covered walkways in lieu of chain-link fencing. Where covered walkways or solid surface fences are installed, a program shall be implemented to allow for art work (e.g., by local students) on the surface(s). Where used, chain link fences shall have slats that will be maintained in good repair.

14. The project construction site shall be maintained in a neat manner, with all trash collected daily, all wood and pipes stacked neatly, and all small parts stored in closed containers.

Concern #F-3: A detailed Safety and Security Plan during construction is needed.

The DEIS (Page 4-155) states, "...During development of the Construction Safety and Security plans, measures would be identified to minimize effects on communities and their resources that address specific consequences anticipated at each location with the various communities, as well as ensure the safety of the public and environment." However, no measures are described in the DEIS. The FEIS should include a detailed Safety and Security Plan that fully explains measures that will be taken to minimize the Project's effects on communities, their resources and how the safety of the public will be ensured during Project Construction activities.

For example:

- Assuming each contractor has its own construction supplies security force, please show where the costs for such security are estimated.
- Each contractor should prepare and implement a security plan to minimize risks of creating an attractive nuisance and of theft of material and equipment—especially dangerous construction equipment.

Concern #F-4: Does the Honolulu Police Department have adequate resources to control traffic during construction?

The DEIS (Page 4-155) also states that police services could be used to control and direct traffic. How would this impact Honolulu Police Department (HPD) resources? Can HPD provide the necessary staff? What would be the impact on higher priority law enforcement activities if HPD is used to manage traffic control throughout construction? The FEIS should include an analysis of existing staffing levels of the HPD and their ability to provide staff to control and direct traffic during project construction activities and how this impacts overall staffing at HPD for other law enforcement activities.

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Concern #F-5: Electric power and/or telephone service may be lost during construction.

There might be an unanticipated loss of power/telephone service to commercial properties should an unknown power or telephone line be severed during project construction activities. What assurances can be given that this will not occur and what recourse for damages will be provided should a power or telephone outage occur?

Concern #F-6: Will sufficient vertical clearance be available along Dillingham Boulevard in the Dillingham Plaza area to provide to construct the elevated transit way?

The DEIS does not address whether sufficient clearauce is currently available along Dillingham Boulevard in the Dillingham Plaza area to provide for enough space to construct the elevated transit way. Dillingham Boulevard in this area is very narrow. How can cranes safely operate in this area without hitting high voltage power lines that are located on both sides of this street?

Concern #F-7: Proposed mitigation measures for air pollution during construction should be made more specific.

The control measures for air quality listed on Page 4-157 of the DEIS should be revised and expanded as follows:

- Minimize land disturbance in any one area by project construction activities.
- Use watering trucks on exposed soil surfaces to minimize dust from project construction areas at least twice a day. Watering may be required more often if any visible plume of dust drifts off any project construction site.
- Use low-emission construction equipment when feasible.
- Cover all loads when hauling soil from project construction sites.
- Cover soil stockpiles if exposed for more than seven days at a time.
- Use windbreaks to prevent accidental dust pollution, especially when construction activities are located near sensitive uses (hospitals, schools or residential areas) or near commercial areas.
- Limit the number of project construction vehicle paths and stabilize temporary roads with water or soil binders.
- Maintain stabilized project construction area ingress/egress areas.
- Wash or clean trucks prior to leaving project construction sites. Install wheel washers if necessary. Soil tracked onto streets adjacent to construction sites shall be swept once a day to remove soil tracked onto them by project construction or delivery vehicles.
- Minimize unnecessary vehicular activities, and limit vehicle traffic to 15 miles per hour on project construction haul roads.

Concern #F-8: Proposed mitigation measures for noise during construction should be made more specific.

Project construction noise will temporarily impact existing land uses on KS owned properties. Therefore, it is requested that the noise measures listed on page 4-158 of the DEIS be modified as follows in the project FEIS:

- Develop a project monitoring plan with noise limits consistent with the construction contractor's noise permit.
- Construct temporary noise barriers or curtains to shield sensitive noise receptors from project construction activities.
- Equip project construction eqnipment engines with adequate mufflers and intake silencers.
- Strategically place stationary equipment, such as compressors and generators as far away from sensitive noise receptors (hospitals, schools and single/multiple family residences) as possible.

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G. Indirect and Cumulative Effects

UltraSystems does not believe that the transit project DEIS adequately analyzes the Project's indirect and cumulative impacts on KS-owned lands along the transit corridor.

The DEIS lacks an adequate discussion in regards to the cumulative impact of parking around transit stations and its effect on available area parking. Given that Transit Oriented Development projects will be underway near transit stations, parking could be an issue and should be discussed in the Project FEIS. KS properties may be affected by the placement of parking near stations. If parking needs are underestimated, then parking will have to be increased at a later time to accommodate the additional parking spaces needed. Since the Pearlridge and Kapalama stations are near or adjacent to KS-owned properties, the planned parking and potential future expansion of parking could impact KS-owned properties and additional full or partial takes may be needed. These cumulative impacts should be discussed in the Project FEIS.

H. Section 4(f) Analysis

The Boulevard Saimin Restaurant, a cultural resource, is located on KS-owned property fronting on Dillingham Boulevard. The Boulevard Saimin parcel would be affected by the widening of Dillingham Boulevard (by approximately 10 feet) to accommodate the fixed guideway in the median in Dillingham Boulevard. A total of 696 square feet of parking area would be necessary to allow for the construction of the Project on this street. This take of a parking area qualifies as a direct use under Section 4(f). The City's acquisition of a portion of the parking area at the Restaurant will not only have impacts on the Restaurant parking, but also parking that is used for those patronizing the many stores that are co-located in the two-story building that houses the Restaurant. It appears that two of the twelve parking spaces provided for restaurant patrons will be lost as a result of the widening of Dillingham Boulevard. **What provisions can be made to compensate for the lost parking spaces that would be taken as a result of the land take? If sufficient parking cannot be provided on or off the building site, will the whole building need to be taken, resulting in the loss of the Restaurant and the other businesses housed in this building?**

I. General Comments on Project Mitigation Measures

UltraSystems' general comment on the mitigation measures included in the Project DEIS is that many of these measures are so vague that it will be difficult to implement them. To remedy this problem, a stand-alone mitigation monitoring and reporting program (MMRP) should be prepared for the proposed as part of the FEIS. The MMRP would include the following:

- *All the mitigation measures included in the FEIS;*
- When these measures are to be implemented (e.g. during Project planning and design/Project construction/during Project operation;
- Who is responsible to see that these measures are implemented; and
- A place for a City and County of Honolulu staff member to sign-off that the measure has been completed.

UltraSystems believes that the City and County of Honolulu should appoint a monitor or monitors whose responsibility would be to ensure that the MMRP is being implemented as project construction takes place. This could be a City/County staff member. The City/County staff member could work with the Project Construction Contractor to implement Project mitigation measures. A report should be prepared annually on the status of the MMRP and what measures were implemented, including evidence that they were implemented (copies of required

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permits etc.); changes to measures that were implemented; and what measures were not implemented and why they were not. The status report on the MMRP would be presented to the Honolulu City Council annually for approval.

UltraSystems has found that for mitigation measures to be implemented they must be located in a stand-alone document and be easily understandable by all parties responsible for their implementation. A commitment by a public agency is also necessary to implement all project mitigation measures, with follow up by elected officials to see that the MMRP has been implemented.

Should you have any questions concerning UltraSystems' comments in this letter on the DEIS, please call me or Bob Rusby, UltraSystems Senior Project Manager, at your convenience at 949-788-4900 or email Bob at rusby@ultrasystems.com.

Sincerely,

ULTRASYSTEMS ENVIRONMENTAL INCORPORATED

Betsy A. Lindsay, President/CEO

cc: Mike Dang, Kamehameha Schools
Director, Planning & Development Division

AR00003497

Status :	Initial Action Needed
Creation Date :	12/11/2008
Creator Affiliation :	
First Name :	Mark
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State :	CA
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Telephone :	403-284-1171
Telephone Extension :	
Add to Mailing List :	Email
Submission Method :	Website
Other Submission Method :	
Submission Date :	12/11/2008
Submission Content/Notes :	I've been a Rail Traffic Controller in Calgary, Alberta, Canada (home of North America's busiest and most successful light rail transit system) for 4 years. I think that this Rail project can be a great success and really make a positive change for Honolulu. I'm interested in the development of the system, and keeping informed so I know when I can apply for a job and help develop a system from the ground up.

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, 3RD FLOOR
HONOLULU, HAWAII 96813
Phone: (808) 768-8305 • Fax: (808) 768-4730 • Internet: www.honolulu.gov

MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-331801

Mr. Mark van der Leest
3031 New Brighton Gardens SE
Calgary 92234
CANADA

Dear Mr. van der Leest:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall indentify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraph addresses your comments regarding the above-referenced submittal:

Your interest in the Project has been noted. You can keep up-to-date with the Project through the Project's website at www.honolulutransit.org. You can find out about available job positions through the City and County's main website at www.honolulu.gov.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
Creation Date :	12/9/2008
Creator Affiliation :	
First Name :	Steven
Last Name :	Vaspra
Business/Organization :	Individual
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Telephone Extension :	
Add to Mailing List :	Email
Submission Method :	Website
Other Submission Method :	
Submission Date :	12/09/2008
Submission Content/Notes :	I am definitely for the Rail project and prefer the airport route starting from Kapolei! I am born, raised and live in Waialua and have made the commute into Honolulu for 44years (I am 59) for school, work and I still commute into Honolulu for work. I have seen, and experienced, the traffic nightmare get worse over the years. With the developement of the second city in Kapolei, the traffice has gotten, is getting, and will get even worse. Councilman Djou is an idiot and Kobayashi and Dela Cruz (our councilman!) aren't far behind. Steve Vaspra Waialua, Oahu, Hi

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-331519

Mr. Steven Vaspra
67-055 Kaioe Place
Waialua, Hawaii 96791

Dear Mr. Vaspra:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall indentify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraph addresses your comments regarding the above-referenced submittal:

Your preference for the Airport Alternative has been noted. While each of the alternatives discussed in the Draft EIS includes trade-offs between benefits and impacts, the Airport Alternative from East Kapolei to Ala Moana has been selected as the Preferred Alternative as described above. As compared to the alternatives discussed in the Draft EIS, the Airport Alternative will carry the most passengers, provide the greatest transit-user benefits, and result in the fewest vehicle hours of delay. It will provide access to employment centers at Pearl Harbor Naval Base and Honolulu International Airport and will serve the Salt Lake neighborhood with connecting bus service. Of the three Build Alternatives addressed in the Draft EIS, the Airport Alternative will have slightly less impacts to the natural and built environment analyzed in the Draft EIS. During the public comment period on the Draft EIS, the public overwhelmingly supported the Airport Alternative. Of the comments that specifically supported one of the alternatives, more than 75 percent were in support of the Airport Alternative. For more

information this selection is discussed in Section 2.4 of the Final EIS. Since publication of the Draft EIS, design has been advanced, further analysis has been completed, and information has been added in response to comments on the Draft EIS and agency coordination. The Final EIS discusses the process that was used to select the Preferred Alternative, how comments were considered in the decision-making process, impacts and mitigation commitments.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Waikiki Improvement Association

29872

FEB 2 2 35 PM '09

January 30, 2009

Honorable Wayne Y. Yoshioka, Director
Department of Transportation Services
City and County of Honolulu
650 South King Street, 3rd Floor
Honolulu, Hawaii 96813

Subject: Comments on the Draft Environmental Impact Statement
for the Honolulu High-Capacity Transit Corridor Project

Dear Mr. Yoshioka,

Thank you for the opportunity to provide comments on the Draft Environmental Impact Statement (DEIS) for the Honolulu High-Capacity Transit Corridor Project (HHCTCP).

The Waikiki Improvement Association continues to follow with great interest how the Honolulu High-Capacity Transit Corridor Project will improve the ability of people to move in the highly congested east-west corridor from Kapolei to the University of Hawaii at Manoa and Waikiki. We continue to support the Project.

We have taken a keen interest in carefully examining the Project's impacts as documented in the DEIS. Our evaluation is based upon identifying needed commitments to assure the HHCTCP supports the facts and findings of the DEIS and the achievement of the Waikiki Transportation Strategy to the maximum degree possible.

Our comments on the last three pages of the attached document address the following three areas: 1) the need for a high quality transit link between the Ala Moana Center station and Waikiki, 2) the need for implementation of pedestrian and bicycle connections as recommended in the City's Waikiki Livable Community Project, and 3) further definition of an off-street transit center at the Ala Moana Center station designed to accommodate the enormous travel demands anticipated at this location.

The Waikiki Improvement Association appreciates the opportunity to offer comments on the HHCTCP DEIS.

Sincerely,

Rick Egged, President

Attached: Waikiki Improvement Association Comments On The Honolulu High-Capacity Transit Corridor Project Draft Environmental Impact Statement (DEIS) / Section 4(f) Evaluation, November 2008.

Waikiki Improvement Association

Comments On The

Honolulu High-Capacity Transit Corridor Project
Draft Environmental Impact Statement (DEIS) / Section 4(f) Evaluation
November 2008

Introduction

The Waikiki Improvement Association (WIA) has reviewed the Honolulu High-Capacity Transit Corridor Project (HHCTCP) Draft Environmental Impact Statement (DEIS) dated November 2008. Comments are preceded by highlighting the references to Waikiki in the DEIS and summarizing the Waikiki Transportation Strategy. Comments focus on identifying commitments needed to assure the HHCTCP supports the facts and findings in the DEIS and the achievement of the Waikiki Transportation Strategy to the maximum degree possible.

HHCTCP DEIS Facts and Findings

The DEIS acknowledges Waikiki's prominent position as a major transit travel market with the following statements:

- "Overall, the largest share of TheBus riders' trips originate in Waikiki." (page 1-13)
- "In 2007, O'ahu hosted 4.6 million visitors (DBEDT 2008), who take more than 17,000 transit trips daily. Many of these visitors stay in the Waikiki area and travel to points of interest outside of Waikiki, including many of the activity centers in the study corridor. (page 1-19)
- The DEIS identifies "Visitor trips from Waikiki" and "Work trips to Waikiki" as "Key Transit Markets" with "Estimated Transit User Benefits Resulting from 2030 Build Alternatives (Hours per Day)". (page 3-36)

The DEIS identifies transportation problems justifying the HHCTCP as a preferred solution. Many of these identified transportation problems feature references to Waikiki transportation issues:

- Waikiki bus service has reliability problems. Route 42 has the largest reliability problem (as depicted by schedule increase) over the 1992 to 2008 period of those routes included in Figure

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1-11. Route 42 travels from Ewa Beach to Waikiki, is "...part of the system's backbone..." with the second highest number of boardings of the selected routes included in Table 3-5. (pages 1-18 and 3-9).

- Waikiki has traffic problems, but Waikiki is not included in the list of committed congestion-relief projects in the O'ahu Regional Transportation Plan. (page 2-13)
- Waikiki has parking problems. "On- and off-street parking facilities are heavily used in Downtown Honolulu, Waikiki, and along University Avenue...Inadequate parking supply has been a long-term problem in this portion of the study corridor." (page 3-15)

The DEIS concludes that the HHCTCP will benefit Waikiki with the following:

- "Bus and fixed guideway departures and arrivals would be coordinated and predictable to minimize transfer time..." (page 2-36)
- "Substantial increases in transit share would also occur...the Waipahu to Waikiki market would increase from 8 percent ... to 26 percent..." (page 3-33)

The DEIS identifies several important unresolved issues potentially significant to Waikiki:

- Funding sources for an extension to Waikiki are not identified. "...planned extensions, would be constructed once additional funding is secured." No potential sources of funding for extensions are identified in the DEIS. (pages 2-38 and 6-1 to 6-11)
- Transit center details are characterized, but not specified. "Bus transfers would be made at off-street transit centers adjacent to fixed guideway stations at ... Ala Moana Center." No Ala Moana off-street transit center is illustrated in the DEIS. (page 2-36)
- Transit service details are characterized, but not specified. "Enhanced bus service would be provided between the terminal stations of the Project and the planned extensions of the fixed guideway system. System improvements, including traffic signal priority, automated vehicle identification, and off-vehicle fare

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collection, would complement frequent bus service at ... Ala Moana Center Station." No specific service frequency intervals are identified in the DEIS. (page 2-36)

- Transit demand entering Ala Moana Center in 2030 is 18,750 to 19,180, roughly three times higher than any other station. No specific analysis is included in the DEIS to accommodate this extraordinary volume of passengers. (Figure 3-12, page 3-31)
- Transit travel time between Honolulu International Airport and Waikiki is a determining factor for supporting the 2030 Airport Alternative. Section 7.5, Important Trade-offs, should include these important destinations in the comparisons presented (Figure 7-9, page 7-11).

Waikiki Transportation Strategy

The DEIS review was conducted in the context of the Waikiki Transportation Strategy. This strategy is founded upon the 1999 report "Recapturing the Magic of Waikiki" and it's following expectation:

> "In Waikiki the pedestrian, visitor and resident alike, will come first. Waikiki will be a pedestrian-oriented resort and a pedestrian-oriented residential area. Walking will be the primary mode of getting around within Waikiki and it will be a pleasurable way to enjoy Waikiki."

The problem encountered with seeing this expectation achieved is that too much traffic in Waikiki conflicts with pedestrians. It is unclear how future actions to implement the HHCTCP may help to solve Waikiki's transportation problems. It is reasonable to expect that safer and more direct pedestrian connections than exist today must be investigated with rail terminating at Ala Moana Center.

Waikiki needs to immediately achieve the expectation of a "Pedestrian First" policy to retain and strengthen it's standing as one of the world's premier destinations, to maintain it's Hawaiian sense of place and to invigorate it's economic vitality. To do this, Waikiki requires the highest quality multi-modal transportation system possible.

Waikiki's multi-modal transportation system needs to keep pace with its continuing transformation. Waikiki needs to evolve from a typical vehicle traffic congested urban atmosphere into a more appealing pedestrian-oriented environment reflective of its unique heritage. Waikiki's transportation infrastructure and services need proper prioritization and reorientation to respond to the "Pedestrian First" policy.

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Solutions Required

The Transportation Strategy builds upon previous efforts to update and advocate for the highest priority transportation solutions. Actions are drawn from past work completed by the City and County of Honolulu with the full involvement of the public such as the Waikiki Livable Community Project (December 2003). Three of the five solution elements directly relate to comments on the HHCTCP DEIS. These three elements are summarized as follows:

1. **Create High Quality Transit Link**. The Waikiki Livable Community Project (WLCP) included an analysis and set of recommendations predicated upon the creation of a high quality transit link to Ala Moana Center, downtown Honolulu and other nodes along the primary urban corridor. Such a link is needed now more than ever to the future rail station at Ala Moana Center.

    a. Direct Transit Link -- The transit route alignment must be quickly and easily understood. This is achieved using the most direct connection possible with Ala Moana Center.

    b. Vehicle Types -- The transit alignment will be operated with advanced design vehicles that are environmentally progressive and reflective of Waikiki's standing as a major international resort destination with emphasis on safety, comfort and cleanliness.

    c. System Improvements -- The transit operation will feature advanced technology passenger information system displays to make it very easy for people to identify how the link operates and how to use it.

    d. Traffic Priority -- The transit operation must be given the highest priority at intersections except where pedestrians and bicyclists are given higher priority. General purpose traffic should be given lowest priority.

    e. Service Frequency – The transit connection must have service intervals between departures equal to, or more frequent than, the rail operation at Ala Moana Center.

2. **Create Safe Pedestrian and Bicycle Connections**. The Waikiki Livable Community Project included a set of pedestrian and bicycle recommendations. These require immediate implementation before rail becomes operational at Ala Moana Center with added network elements to offer a high quality link to Waikiki.

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a. Wider Sidewalks – Construct projects as identified in the WLCP.

b. Ala Wai Pedestrian-Bicycle Bridges – High quality connections are essential between the termination of rail at Ala Moana Center and Waikiki.

c. Intersection Re-orientation – Priority must be given to pedestrians and cyclists. Traffic signal wait times for pedestrians must be reduced.

3. **Locate Strategic Parking Capacity**. Parking facilities are needed to replace on street parking to allow many of the proposals outlined to proceed. Parking facilities are needed to replace displaced off street parking and offset future development needs.

    a. Candidate Sites Have Been Identified:

        i. Central location – Fort DeRussy. National Defense Authorization Act for Fiscal Year 2002 (sec. 2832). Authorizes the Secretary of the Army to enter into a lease with the City and County of Honolulu to allow the City to construct and operate a parking facility.

        ii. Central location – Residential. Two sites have been identified primarily for residential, long-term parking:

            1. Kuhio-Kaiolu. Increase the 72 current municipal parking spaces up to 525 spaces with a four-level parking structure.

            2. Aloha Street. Three-level parking structure.

        iii. Peripheral location – Kapahulu Corridor. An undeveloped site owned by DLNR may be available through the lease holder. The property (0.57 acres) is surrounded by the Prudential Locations building to the north, the Ala Wai Golf Course to the west and a Board of Water Supply booster station to the south. Adjacent sites may be available. Other sites in the corridor might warrant exploration.

        iv. Peripheral location – Kapiolani Corridor. Several undeveloped sites (owned privately) are situated between Kona and Kapiolani Boulevard in close proximity to the proposed Ala Moana terminal rail station. Some of these sites have potential for a combined parking and bus terminal. Other sites along Kapiolani might warrant exploration.

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b. Financial Approach Is Viable. Construction could be funded with municipal bonds repaid through parking revenues and in lieu of parking payments.

HHCTCP DEIS Comments

WIA supports the HHCTCP DEIS and the implementation of the Project. WIA concludes that the intent of the Project is substantially supportive of the intent of the WIA Transportation Strategy. WIA seeks further clarity to be offered in the Final Environmental Impact Statement (FEIS). In consideration of the facts and findings in the HHCTCP DEIS and WIA's Transportation Strategy the following comments are offered:

1. A high quality transit link as outlined in the WIA Transportation Strategy is essential. Figure 2-8 on page 2-18 of the DEIS includes an extension into Waikiki from Kapiolani Boulevard along Kalakaua Avenue to Kuhio Avenue with stations at the Hawaii Convention Center, the vicinity of Kalaimoku Street and Kuhio Avenue as well as a terminal stop near Liliuokalani Avenue and Kuhio Avenue.

   The Waikiki Improvement Association appreciates the need to guarantee access for not only our visitors but employees and residents as well. We believe that Waikiki is well served by the City's award winning bus system. WIA's primary concern with the High-Capacity Transit Corridor Project Waikiki spur proposal is the loss of street capacity created by locating an overhead line down Kalakaua and Kuhio Avenues.

   We have concerns over the aesthetic and physical density issues of locating the overhead track in a resort and residential area. The Waikiki Improvement Association urges the City and County of Honolulu to continue to serve the area by bus transit or some other high quality transit link rather than add an overhead fixed guideway into Waikiki.
   The high quality transit link must provide the minimum elapsed travel time possible not just between Waikiki and Ala Moana Center, but other important destinations as well such as the Honolulu international Airport. Therefore, we strongly endorse the alternatives including the Airport alignment.

   The DEIS confirms that "Overall, the largest share of TheBus riders' trips originate in Waikiki" and many of these riders will likely be those forecast to be entering the Ala Moana Center station by other modes. This will constitute, by far, the highest passenger volume accessing the

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rail system. More specificity is needed in the FEIS. The FEIS should identify:

a. A transit route alignment linking Ala Moana Center with Waikiki and preferably follow the one developed for the WIA's Transportation Strategy.

b. The types of buses intended to be used for the most important transit routes, such as between the Ala Moana Center station and Waikiki.

c. The specifics of the featured system improvements such as advanced technology passenger information system displays, traffic signal priority, automated vehicle identification, and off-vehicle fare collection.

d. Specific intersections along the most important bus shuttle transit links where the bus will be given highest priority at intersections except where pedestrians and bicyclists are given higher priority.

e. The service intervals for high priority transit connections. The FEIS should identify the link to Waikiki with a service interval between bus departures equal to, or more frequent than, the rail operation at Ala Moana Center.

2. Pedestrian and bicycle connections, as outlined in the WIA Transportation Strategy, should be identified in the FEIS. The Waikiki Livable Community Project included a set of pedestrian and bicycle recommendations. These require immediate implementation before rail becomes operational at Ala Moana Center with added pedestrian and bicycle network elements to offer a high quality multi-modal transportation links to Waikiki. The FEIS should identify:

a. The need to construct the projects as identified in the WLCP to support the HHCTCP.

b. The need to construct high quality pedestrian and bicycle connections between the termination of rail at the Ala Moana Center station and Waikiki to support the HHCTCP.

c. The need to give priority to pedestrians and cyclists. Traffic signal wait times for pedestrians at key intersections must be reduced to support the termination of the Project at Ala Moana Center station.

AR00003510

3. An Ala Moana Transit Center station transit center should be identified in the FEIS. The DEIS states: "Bus transfers would be made at off-street transit centers adjacent to fixed guideway stations at ... Ala Moana Center." The WIA Transportation Strategy includes locating strategic parking capacity. The Ala Moana Transit Center station transit center and the WIA Transportation Strategy represent a consistent opportunity for a private-public partnership at this location. The FEIS should include further definition of the needs to accommodate the enormous travel demands at an off-street transit center at the Ala Moana station.

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, 3RD FLOOR
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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010 RT10/09-336361

Mr. Rick Egged, President
Waikiki Improvement Association
2255 Kuhio Avenue, #760
Honolulu, Hawaii 96815

Dear Mr. Egged:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

To address issues identified at the bottom of page 2 in your letter,

- *Funding sources for rail extensions have not been identified, although the capital costs of the extensions would likely be funded from a combination of Local and Federal sources. The planned extensions are not part of the Federal action covered in the Final EIS.*

- *To answer your next point, transfers will continue to occur at Kona Street (a private street) and at the off-street bus stop on Ala Moana Boulevard. Text in*

Chapter 3 of the Final EIS has been clarified to state that transfers at Ala Moana Center will continue to occur on Kona Street.

- *Existing and future bus routes, including route numbers and frequency, are provided as Appendix D in the Final EIS.*

- *Ala Moana Center Station, like all stations, is being designed to accommodate expected passenger volumes, including the number of pedestrians, bicyclists, bus transfers, and passenger drop-offs that will occur at the station. Station components, including platforms, stairways, escalators, and elevators, are all designed to accommodate passenger volumes anticipated in the year 2055 (achieved by applying a standard growth factor to the 2030 forecast volumes).*

  In addition, the Ala Moana Center Station was one of five selected for additional traffic analysis due to the large volume of bus transfers and pedestrian activity anticipated. As shown in Table 3-23 in the Final EIS, the traffic analysis found a potential future effect at the intersection of Kona Street and Keeaumoku Street. To mitigate this effect, the Project will signalize this intersection.

- *Transit travel time between Honolulu International Airport and Waikiki is an important factor for supporting the Airport Alternative and, accordingly, Figure 3-7 in the Final EIS has been revised to include this travel pair. As shown in this figure, transit travel time from the Airport to Waikiki will take 40 minutes with the Project compared to approximately 70 minutes without the Project. Table 7-9 in the Draft EIS compared the No Build Alternative and the three fixed guideway alternatives. While each of the alternatives includes trade-offs between benefits and impacts, the Airport Alternative from East Kapolei to Ala Moana Center has been selected as the Preferred Alternative. The identification of the Airport Alternative as the Preferred Alternative was made by the City to comply with FTA's NEPA regulations that state that the Final EIS should focus on the Preferred Alternative (23 CFR § 771.125 (a)(1)). Table 7-9 has been removed from the Final EIS.*

Your letter next had a section titled "Waikiki Transportation Strategy," which is addressed below.

The Project has logical termini at East Kapolei and Ala Moana Center and independent utility from any extensions that may be constructed in the future. The future extensions to West Kapolei, Salt Lake Boulevard, Waikiki, and UH Manoa are discussed in the cumulative impacts sections of Chapters 3 and 4 of the Final EIS. The future extensions are not part of this Project; thus, they are not required to be evaluated under Chapter 343 of the Hawaii Revised Statutes and NEPA. Under NEPA, environmental analysis is only required when there is a proposed action by a Federal agency. Here, because the future extensions are not proposed for implementation at this time, they are not part of the Project studied in the Final EIS. It would be premature to undertake an environmental analysis of the extensions (beyond the cumulative impacts analysis) because

they are not part of the proposed action to be taken by the City and FTA. If the future extensions are proposed for implementation in the future, environmental analysis of the extensions and appropriate alternatives will be undertaken at that time. The Project does not preclude bicycle or pedestrian improvements from occurring in Waikiki, although such improvements are not part of the Project.

Figure 3-7 in the Final EIS shows travel time from Waipahu to Waikiki and from the Airport to Waikiki. As shown in this figure, travel times for both pairs improve with the Project compared to the No Build Alternative.

As stated in Section 2.5.5 of the Final EIS, design criteria developed for project stations place highest emphasis on walk and bicycle access. Pedestrian access to stations, including accessible routes, will be given first priority for reasons of safety. The design criteria also state that, as a non-motorized mode, bicycles will be given second priority and will be placed over all motorized vehicular access to project stations.

One of the major effects of the Project has a direct bearing on efforts to attain a "pedestrian first" environment in Waikiki. As indicated in Section 3.4.2 of the Final EIS, the Project will result in higher shares of travel by transit and less by automobiles as compared to the No Build Alternative. The Final EIS specifically noted that, for the Waipahu to Waikiki market, the transit share of home-based work trips in the a.m. peak period will increase from 8 percent under the No Build Alternative to 36 percent with the Project.

A "pedestrian first" policy will also be supported by the type of access that is expected for the project system. The Final EIS noted that, with the Project, overall accessibility to transit will be enhanced. As shown in Table 3-20 of the Final EIS, bus and walk/bike access to stations will account for approximately 90 percent of total daily trips.

Your letter next had a section titled "Solutions Required," which is addressed below:

1. *As identified in Section 3.4.2 of the Final EIS, enhanced bus service will be provided between the terminal stations of the Project and future extensions of the entire fixed guideway system. System improvements, including traffic signal priority, automated vehicle identification, and off-vehicle fare collections, will complement frequent bus service at Ala Moana Center Station. Bus and fixed guideway departures and arrivals will be coordinated and predictable to minimize transfer time and total trip time.*

2. *The Project does not preclude bicycle or pedestrian improvements from occurring in Waikiki in advance of any extensions, although such improvements are not part of the Project.*

3. *The Project does not affect on-street or off-street parking in Waikiki. Potential spillover parking may occur as a result of the Project at the Ala Moana Center*

Station area. Approaches to mitigating the effects of spillover parking will be unique to each station area. The City will conduct surveys to determine the extent of spillover parking near stations and implement mitigation strategies as needed. Strategies to be used include, but are not limited to, parking restrictions (where parking causes safety or congestion problems) and shared parking arrangements (at locations where parking is available but dedicated to another purpose such as retail centers, office uses, or places of worship). Implemented strategies will be monitored and necessary adjustments will be made as needed.

Finally, your comments in the section titled "HHCTCP DEIS Comments" are addressed below.

1. *The Draft and Final EISs evaluate the Project, which is defined as extending from East Kapolei to Ala Moana Center. The Project does not include construction of any elevated or at-grade structures in Waikiki. Accordingly, there will not be any loss of street capacity in Waikiki. A detailed environmental review would be conducted when the extensions proposed for implementation are implemented.*

   Your preference for the Airport Alternative has been noted. While each of the alternatives discussed in the Draft EIS includes trade-offs between benefits and impacts, the Airport Alternative from East Kapolei to Ala Moana has been selected as the Preferred Alternative as described above. As compared to the alternatives discussed in the Draft EIS, the Airport Alternative will carry the most passengers, provide the greatest transit-user benefits, and result in the fewest vehicle hours of delay. It will provide access to employment centers at Pearl Harbor Naval Base and Honolulu International Airport and will serve the Salt Lake neighborhood with connecting bus service. Of the three Build Alternatives addressed in the Draft EIS, the Airport Alternative will have slightly less impacts to the natural and built environment analyzed in the Draft EIS. During the public comment period on the Draft EIS, the public overwhelmingly supported the Airport Alternative. Of the comments that specifically supported one of the alternatives, more than 75 percent were in support of the Airport Alternative. For more information this selection is discussed in Section 2.4 of the Final EIS. Since publication of the Draft EIS, design has been advanced, further analysis has been completed, and information has been added in response to comments on the Draft EIS and agency coordination. The Final EIS discusses the process that was used to select the Preferred Alternative, how comments were considered in the decision-making process, impacts and mitigation commitments.

   As stated previously, Figure 3-7 in the Final EIS shows that transit travel times from the Airport to Waikiki improve substantially with the Project compared to the No Build Alternative.

   a. *Frequent bus service will connect Ala Moana Center Station and Waikiki. A detailed description of bus routes, including route numbers and frequency, is provided in Appendix D of the Final EIS.*

b. The types of buses used in a given service area are selected based on need. If the demand is high, TheBus typically assigns longer, higher-capacity articulated buses to serve a route as long as the route can accommodate them. For smaller demands, shorter buses are used. The demand is forecast to be high so the expectation will be for articulated buses to be used, but a final decision will only be made at the time the service is implemented. Under any circumstances, TheBus will continue to operate between Ala Moana Center and Waikiki, and bus service will be enhanced to provide a reliable link between Ala Moana Center and Waikiki.

c. The Project will provide passenger system information, automated vehicle identification, and off-vehicle fare collection for the fixed guideway system. Specific designs and requirements for these systems will be developed during Final Design of the transit vehicle and systems portions of the Project.

d. The Project will provide passenger system information, automated vehicle identification, and off-vehicle fare collection to complement frequent bus service at Ala Moana Center Station. As stated in the previous response, specific designs for these systems will be developed during Final Design.

e. Existing and future bus routes, including route numbers and frequency, are provided in Appendix D in the Final EIS.

2. *Regarding pedestrian and bicycle connections:*

a. The bicycle and pedestrian recommendations of the Waikiki Livable Community Project planning study are acknowledged. However, the Project scope does not include improvements beyond station and guideway facilitates. Ongoing coordination efforts with the public and information from studies will help formulate design measures that will enhance the interface between the transit system and the surrounding community.

b. The scope and resulting Draft EIS for the Project did not include improvements beyond stations and guideway facilities. However, as indicated in Section 4.6.3 of the Final EIS, ongoing coordination efforts with the public will help develop design measures that will enhance the interface between the transit system and the surrounding community.

c. The Project does not generally include improvements beyond stations and guideway facilities. However, as shown in Chapter 3 of the Final EIS, signalization of the intersection of Kona Street and Keeaumoku Street will be included as mitigation. That will improve pedestrian and bicycle access and safety near the station. In addition, as indicated in Section 4.6.3 of the Final EIS, ongoing coordination efforts with the public will help develop design measures that will enhance the interface between the transit system and the surrounding community. These measures could include traffic operations, such as signal modifications.

3. *Concerning the Ala Moana Transit Center, as identified in Section 3.4.2 of the Final EIS, enhanced bus service will be provided between the terminal stations of the Project and planned extensions of the system. At Ala Moana Center Station, bus connections will be provided along Kona Street, which serves as a bus transit facility. With planned improvements, such as signalization at Keeaumoku Street, Kona Street will have adequate capacity to serve the projected volume and frequency of bus traffic.*

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Issuance of the Record of Decision under NEPA and acceptance of the Final EIS by the Governor of the State of Hawaii are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Mr. Ted Matley
FTA Region IX
201 Mission Street, Suite 1650
San Francisco, CA 94105

Mr. Wayne Y. Yoshioka
Department of Transportation
City and County of Honolulu
650 South King Street, 3rd Floor
Honolulu, Hawai'i 96813

RE: Honolulu High-Capacity Transit Corridor Project (Draft EIS)

Thank you for the chance to comment. As a property owner on Oahu, I support the general concept presented. I will rely not only on experiences gained from a career as a transportation engineer, but my current status as the interim chair of the Hawai'i County Transportation Commission and a proponent for balanced transportation, smart growth and more livable communities to offer additional comments and recommendations.

As one of several transportation alternatives that would be acceptable solutions for the Honolulu environment, this decision will guide us how to prioritize all of our transportation options. The future remains shrouded and it is truly impossible to determine form the study alone how successful the transit system will become. It will, however, be substantial enough that the government, residents, and visitors will have the resources and ability to steer the system towards ultimate success.

The project as proposed will also help determine how we allocate our valuable and limited energy resources. This may be just as crucial of a decision. Sustainable energy systems will play an increasing role in our island State. Fixed generation from natural or renewable resources will likely play an important role. When fuel sources and generators are not required on board, energy consumption and capacity improve.

This project will also provide us with lifestyle opportunities and options on how we as residents and guests choose to move around. Balancing our time and how productively we use it are important considerations for all of us. How we access our transportation options are also important considerations that will impact our lifestyles. In light of the above comments, I offer the following recommendations for consideration during planning, design, and construction.

RECEIVED
2008 JAN 9 P12:41
OFFICE OF THE MAYOR
CITY & COUNTY OF HONOLULU

RECOMMENDATIONS:

FIRST. Including direct access to Honolulu International Airport is absolutely essential. This is one of the largest origins and destinations in the State. This is our primary link to the mainland and international markets. It is also a critical portal for interisland travel fulfilling commuting, medical, recreational, and personal needs.

SECOND. Construction must start from the Ala Moana end. This is already a major transit terminal and is an existing TOD providing direct access to shopping, accommodations, recreation, and the convention center. This would also be the physical foundation to advance the planning forward on both additional routes. If financial, environmental, or unknown setbacks occur, a viable transit core remains available.

THIRD. The design must include considerations for accommodating utilities and other facilities. Mounting points and potential loadings should be incorporated in the design to avoid unnecessary future costs and disruptions. The upfront costs would be minor. The large support structure could also carry electric lines, street lighting, communications, architectural lighting, and even replacement water lines. Perhaps the most desirable facility that could be added in the future is an elevated bikeway. Bicyclist would benefit from the same conditions as elevated transit, no intersections. Bicycle usage is increasing and a bikeway would provide additional commuting options, transit access, and a very unique tourism attraction, unparalleled in the world.

Thank you for your consideration,

Robert Ward

Additional Copy:

Director
Office of Environmental Quality Control
235 South Beretania Street, Suite 702
Honolulu, HI 96813

Return Address:

77-6526 Ho`olaupa`i St
Kailua Kona, HI 96740

DEPARTMENT OF TRANSPORTATION SERVICES

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010 RT1/09-294693R

Mr. Robert Ward
77-6526 Hoolaupai Street
Kailua-Kona, Hawaii 96740

Dear Mr. Ward:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

To address your first recommendation, your preference for the Airport Alternative has been noted. While each of the alternatives discussed in the Draft EIS includes trade-offs between benefits and impacts, the Airport Alternative from East Kapolei to Ala Moana has been selected as the Preferred Alternative as described above. As compared to the alternatives discussed in the Draft EIS, the Airport Alternative will carry the most passengers, provide the greatest transit-user benefits, and result in the fewest vehicle hours of delay. It will provide access to employment centers at Pearl Harbor Naval Base and Honolulu International Airport and will serve the Salt Lake neighborhood with connecting bus service. Of the three Build Alternatives addressed in the Draft EIS, the Airport Alternative will have slightly less impacts to the natural and built environment analyzed in the Draft EIS. During the public comment period on the Draft EIS, the public overwhelmingly supported the Airport Alternative. Of the comments that specifically supported one of the alternatives, more than 75 percent were in support of the

Airport Alternative. For more information this selection is discussed in Section 2.4 of the Final EIS. Since publication of the Draft EIS, design has been advanced, further analysis has been completed, and information has been added in response to comments on the Draft EIS and agency coordination. The Final EIS discusses the process that was used to select the Preferred Alternative, how comments were considered in the decision-making process, impacts and mitigation commitments.

As described in Section 2.5.10, Project Phasing, and further in Section 8.6.9, Construction Phasing, in the Final EIS, to support phased opening, the first construction phase must be connected to a maintenance and storage facility, which requires considerable space. No location has been identified closer to Downtown with sufficient available space to construct a maintenance and storage facility. Therefore, construction will begin between East Kapolei and Leeward Community College. The Project will be constructed in phases to accomplish the following:

- *Match the anticipated schedule for right-of-way acquisition and utility relocations.*
- *Reduce the time that each area will experience traffic and community disturbances.*
- *Allow for multiple construction contracts with smaller contract size to promote more competitive bidding.*
- *Match the rate of construction to what can be maintained with local workforce and available financial resources.*
- *Balance expenditure of funds to minimize borrowing.*

The portion of the corridor in the Ewa direction of Pearl Highlands is less developed than the areas in the Koko Head direction. Right-of-way can be obtained more quickly at the west end of the Project; therefore, overall project construction can begin earlier, resulting in lower total construction costs. Construction is planned to continue uninterrupted in the Koko Head direction from Pearl Highlands to Aloha Stadium, Kalihi, and finally to Ala Moana Center.

As portions of the Project are completed, each will be opened incrementally so that system benefits, even if limited during the initial phases, will be realized prior to completion of construction of the entire Project.

As discussed in Section 4.18.2 of the Final EIS, "Communication and coordination have been initiated with the affected utility agencies and companies and will continue throughout design and construction." Further, "Design criteria will govern all new utility construction outside of buildings, as well as the support, maintenance, relocation, and restoration of utilities encountered and affected by construction of the fixed guideway." In addition, "Along several roadway corridors, most existing overhead utilities in conflict with the guideway and safety clearance requirements will be relocated underground." Existing overhead electrical and communication utilities not in conflict with the aerial guideway and safety clearance requirements will remain overhead. Coordination will occur with emergency services and utility companies to

ensure that utility relocations meet their needs and that sufficient clearance is provided. The City will evaluate relocation of utilities that are in conflict with the fixed guideway during preliminary design. An elevated bikeway is outside the scope of the EIS.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
Creation Date :	1/4/2009
Creator Affiliation :	
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Add to Mailing List :	None
Submission Method :	Website
Other Submission Method :	
Submission Date :	01/04/2009
Submission Content/Notes :	I find it appalling that you will still consider this rail systen with our economy so bad and the GET collection is low. Instead of breaking up our island, I have never seen anyone try to close one lane for more busses to be able to bypass the traffic during peak hours. This would eliminate the danger of crazy cars cutting off busses and would give riders a faster ride to their destinations. We are on a beautiful island and ruining its beauty with a rail system is the most ridiculous thing I have ever heard of. Having additional jobs for these union workers and our county go into bankruptcy is STUPID!!! With the gas high I already see a cut in cars on the road. People love their cars and to cut down the roads they can drive on is STUPID! Unless you stop more cars from coming in, drivers will drive. The little ridership on this rail doesn't warrant the expense in building it or maintaining it. Both the state and county are cutting back in the budgets. We have much more pressing problems in this state and county. Wasting billions on rail instead of focusing on getting solar energy going in county and state offices or giving more to the education of our young is a much better way to spend our monies.

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010 RT9/09-332360

Ms. Mary Warren
60 North Nimitz Highway, #1604
Honolulu, Hawaii 96817

Dear Ms. Warren:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

Your preference for the No Build Alternative has been noted. However, the No Build Alternative does not address the project needs or meet the purpose of the project, as established in Sections 1.7 and 1.8 of the EIS. While each of the alternatives discussed in the Draft EIS includes trade-offs between benefits and impacts, the Airport Alternative from East Kapolei to Ala Moana has been selected as the Preferred Alternative as described above. As compared to the alternatives discussed in the Draft EIS, the Airport Alternative will carry the most passengers, provide the greatest transit-user benefits, and result in the fewest vehicle hours of delay. It will provide access to employment centers at Pearl Harbor Naval Base and Honolulu International Airport and will serve the Salt Lake neighborhood with connecting bus service. Of the three Build Alternatives addressed in the Draft EIS, the Airport Alternative will have slightly less impacts to the natural and built environment analyzed in the Draft EIS. During the public comment period on the Draft EIS, the public overwhelmingly supported the Airport Alternative. Of the comments that specifically supported one of the alternatives, more than 75 percent were in support of the Airport Alternative. For more information this selection is discussed in Section 2.4 of the Final EIS. Since publication of the Draft EIS, design has been

advanced, further analysis has been completed, and information has been added in response to comments on the Draft EIS and agency coordination. The Final EIS discusses the process that was used to select the Preferred Alternative, how comments were considered in the decision-making process, impacts and mitigation commitments.

Under the No Build and Build Alternatives, the travel forecasting model has assumed several transportation projects, including congestion-relief items for Oahu streets and highways, would be in place in 2030. These projects are detailed in Table 2-4 of the Final EIS. As identified in Table 3-14 of the Final EIS, the Project will reduce vehicle delay by 18 percent compared to the No Build Alternative. This reduction in delay is attributable to shifts in travel demand from automobile to transit.

As noted in Section 3.2.1 of the Final EIS, the estimates for transit ridership were derived from a travel demand forecasting model used by the Oahu Metropolitan Planning Organization for the Oahu Regional Transportation Plan 2030. *The model is based on "best practices" for urban travel models in the U.S. and guidelines established by FTA. As shown in Table 3-18 of the Final EIS, the travel demand forecasting model forecast 116,300 daily fixed guideway boardings. In addition, total daily transit boardings (bus and rail) will increase 44 percent compared to the No Build Alternative.*

Capital costs of the Project, including finance charges, are expected to be fully paid for by a combination of FTA Section 5309 New Starts and FTA Section 5307 funds from the Federal government and from the County's General Excise Tax and Use (GET) surcharge levied from 2007 through 2022. Capital costs are discussed in Chapter 6 of the Final EIS.

Enabling legislation for the County's GET Surcharge and Ordinance 07-001 preclude the use of the collected funds for education or purposes other than a fixed guideway system.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
Creation Date :	12/9/2008
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Telephone Extension :	
Add to Mailing List :	Both
Submission Method :	Website
Other Submission Method :	
Submission Date :	12/09/2008
Submission Content/Notes :	1. I am a strong supporter of rail transit. 2. I understand the rationale for starting construction in Kapolei, related to space for a base yard. 3. However I think the city should do whatever required to start at Ala Moana and work out towards Ewa. 4. First, there will be income from the core traffic, which will not result from Kapolei to Waipahu. 5. Second, if funding or other obstacles occur (perhaps I should say WHEN, not IF), we will have a usable system. 6. Third, when Pearl City is reached, there will be a significant impact on traffic from Ewa, which will build and sustain the political support needed for this multi-year project.

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-331590

Mr. Richard Wasnich
401 Kamakee Street
Apartment 314
Honolulu, Hawaii 96814

Dear Mr. Wasnich:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall indentify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

As described in Section 2.5.10, Project Phasing, and further in Section 8.6.9, Construction Phasing, in the Final EIS, to support phased opening, the first construction phase must be connected to a maintenance and storage facility, which requires considerable space. No location has been identified closer to Downtown with sufficient available space to construct a maintenance and storage facility. Therefore, construction will begin between East Kapolei and Leeward Community College. The Project will be constructed in phases to accomplish the following:

- *Match the anticipated schedule for right-of-way acquisition and utility relocations.*

- *Reduce the time that each area will experience traffic and community disturbances.*
- *Allow for multiple construction contracts with smaller contract size to promote more competitive bidding.*
- *Match the rate of construction to what can be maintained with local workforce and available financial resources.*
- *Balance expenditure of funds to minimize borrowing.*

The portion of the corridor in the Ewa direction of Pearl Highlands is less developed than the areas in the Koko Head direction. Right-of-way can be obtained more quickly at the west end of the Project; therefore, overall project construction can begin earlier, resulting in lower total construction costs. Construction is planned to continue uninterrupted in the Koko Head direction from Pearl Highlands to Aloha Stadium, Kalihi, and finally to Ala Moana Center.

As portions of the Project are completed, each will be opened incrementally so that system benefits, even if limited during the initial phases, will be realized prior to completion of construction of the entire Project.

Lastly, it should be noted that project construction will be paid for with the local General Excise and Use Tax (GET) surcharge and Federal funding, as stated in Section 6.4.2 of the Final EIS. Revenue generated from ridership will be used to fund operating and maintenance costs.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

PA / 12/08-277144

Max H. Watson
1777 Ala Moana Blvd., Apt. 1808
Honolulu, HI 96815
December 18, 2008

Dept. of Transportation Services
650 S. King St., 3rd Floor
Honolulu, HI 96813

Dear Dot:

The draft EIS is another step toward bankruptsy. No one has completely explained who is going to pay for this white elephant and how long our great grandchildren will have to pay for but never ride.

Serious budget cuts are now going on. What has happened to common sense?
Bottom line: Billions of tax dollars down a rat hole while our sewer systems deteriorate and other needs await funding. This will be Hawaii's "Big Dig"

Sincerely yours,

Max H. Watson
Tax Payer

Copy to:
The Honorable Linda Lingle
The Honolulu Advertiser
The Star Bulletin
The Honolulu City Council
Pacific Business News

'08 DEC 23 P2:39
DTS
RAPID TRANSIT

AR00003529

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, 3RD FLOOR
HONOLULU, HAWAII 96813
Phone: (808) 768-8305 • Fax: (808) 768-4730 • Internet: www.honolulu.gov

MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010 RT10/09-336144

Mr. Max H. Watson
1777 Ala Moana Boulevard
Apartment 1808
Honolulu, Hawaii 96815

Dear Mr. Watson:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraph addresses your comments regarding the above-referenced submittal:

Chapter 6 of the Final EIS describes the financial resources anticipated to be needed to pay for the capital costs of the Project and for ongoing operating and maintenance costs. Capital costs of the Project, including finance charges, are expected to be fully paid for by a combination of FTA Section 5309 New Starts Funds and FTA Section 5307 Funds from the Federal government and revenues from the County General Excise and Use Tax (GET) surcharge levied from 2007 through 2022 on Oahu. Operating and maintenance costs will be paid for from the same sources currently used for TheBus: Federal funding, fare revenues, and City revenues from the General and Highway Funds.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter.

Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
Creation Date :	12/11/2008
Creator Affiliation :	
First Name :	Claudia
Last Name :	Webster
Business/Organization :	
Address :	14 Aulike St., #305
Alternative Preference :	
Apt./Suite No. :	305
City :	Kailua
State :	HI
Zip Code :	96734
Email :	clwswim@hawaii.rr.com
Telephone :	808-262-6243
Telephone Extension :	
Add to Mailing List :	Email
Submission Method :	Website
Other Submission Method :	
Submission Date :	12/11/2008
Submission Content/Notes :	Yes, I am in favor of the proposed rail system. I would think it more practical to start in downtown Honolulu and build out rather than starting in the west and building in. I lived in Portland, Oregon for 30 years. During that time the MAX lightrail system was built and expanded. It is a wonderful addition to city transportation. I remember when it was started in downtown as I was working there. It was a mess, but we all survived. And over the years additional spurs have been added. So from my experience in Portland and riding light rail in other cities I enthusiastically support light rail. Claudia L. Webster--have lived in Kailua for almost 2 years now.

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-331802

Ms. Claudia Webster
14 Aulike Street, #305
Kailua, Hawaii 96734

Dear Ms. Webster:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall indentify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraph addresses your comments regarding the above-referenced submittal:

As described in Section 2.5.10, Project Phasing, and further in Section 8.6.9, Construction Phasing, in the Final EIS, to support phased opening, the first construction phase must be connected to a maintenance and storage facility, which requires considerable space. No location has been identified closer to Downtown with sufficient available space to construct a maintenance and storage facility. Therefore, construction will begin between East Kapolei and Leeward Community College. The Project will be constructed in phases to accomplish the following:

- *Match the anticipated schedule for right-of-way acquisition and utility relocations.*

- *Reduce the time that each area will experience traffic and community disturbances.*
- *Allow for multiple construction contracts with smaller contract size to promote more competitive bidding.*
- *Match the rate of construction to what can be maintained with local workforce and available financial resources.*
- *Balance expenditure of funds to minimize borrowing.*

The portion of the corridor in the Ewa direction of Pearl Highlands is less developed than the areas in the Koko Head direction. Right-of-way can be obtained more quickly at the west end of the Project; therefore, overall project construction can begin earlier, resulting in lower total construction costs. Construction is planned to continue uninterrupted in the Koko Head direction from Pearl Highlands to Aloha Stadium, Kalihi, and finally to Ala Moana Center.

As portions of the Project are completed, each will be opened incrementally so that system benefits, even if limited during the initial phases, will be realized prior to completion of construction of the entire Project.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Action Completed
Creation Date :	11/5/2008
Creator Affiliation :	
First Name :	Dan
Last Name :	Weissmann
Business/Organization :	
Address :	3932 Spencer St
Apt./Suite No. :	
City :	Keller
State :	TX
Zip Code :	76248
Email :	striptees@verizon.net
Telephone :	214-226-4439
Telephone Extension :	
Add to Mailing List :	Email
Submission Method :	Website
Other Submission Method :	
Submission Date :	11/05/2008
Submission Content/Notes :	Hi. I am working on a research project and have a question, Can you tell me why you decided not to build your future rail system partially or completely underground? The costs of an elevated system seem to be about the same, and with land at a premium, this at first glance seems like a more logicel choice. Thanks, Dan

DEPARTMENT OF TRANSPORTATION SERVICES

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

RT9/09-330380

May 21, 2010

Mr. Dan Weissmann
3932 Spencer Street
Keller, Texas 76248

Dear Mr. Weissmann:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraph addresses comments regarding the above-referenced submittal:

As documented in the Alternatives Analysis cost estimate, the cost of an underground system would have been substantially greater than that for an elevated system.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Issuance of the Record of Decision under NEPA and acceptance of the Final EIS by the Governor of the State of Hawaii are the next anticipated actions and will conclude the environmental review process for this Project.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
Creation Date :	12/7/2008
Creator Affiliation :	
First Name :	Susan
Last Name :	Werner
Business/Organization :	
Address :	2017 Lelehuna Pl
Alternative Preference :	
Apt./Suite No. :	
City :	Haiku
State :	HI
Zip Code :	96708
Email :	werners002@hawaii.rr.com
Telephone :	
Telephone Extension :	
Add to Mailing List :	Email
Submission Method :	Website
Other Submission Method :	
Submission Date :	12/07/2008
Submission Content/Notes :	I would like to express my strong support for the rail line to include a stop at the airport. As a neighbor island resident who visits Oahu occasionally, it would mean a lot to me to be able to get to either Kapolei or to the Ala Moana Shopping center directly from the airport, without having to rent a car or take a taxi, both of which would add an additional vehicle to the traffic. I am disappointed that a more modern bullet-train type of system was not chosen instead of steel rail, but I consider steel rail better than no rail. Honlulu could have used this opportunity to step into the 21st Century of transportation; a bullet-train or similar technological system could also be a tourist attraction as well as transportation for residents. But I support the plan as long as it includes a stop at the airport.

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-331309

Ms. Susan Werner
2017 Lelehuna Place
Haiku, Hawaii 96708

Dear Ms. Werner:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall indentify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

Your preference for the Airport Alternative has been noted. While each of the alternatives discussed in the Draft EIS includes trade-offs between benefits and impacts, the Airport Alternative from East Kapolei to Ala Moana has been selected as the Preferred Alternative as described above. As compared to the alternatives discussed in the Draft EIS, the Airport Alternative will carry the most passengers, provide the greatest transit-user benefits, and result in the fewest vehicle hours of delay. It will provide access to employment centers at Pearl Harbor Naval Base and Honolulu International Airport and will serve the Salt Lake neighborhood with connecting bus service. Of the three Build Alternatives addressed in the Draft EIS, the Airport Alternative will have slightly less impacts to the natural and built environment analyzed in the Draft EIS. During the public comment period on the Draft EIS, the public overwhelmingly supported the Airport Alternative. Of the comments that specifically supported one of the alternatives, more than 75 percent were in support of the Airport Alternative. For more

information this selection is discussed in Section 2.4 of the Final EIS. Since publication of the Draft EIS, design has been advanced, further analysis has been completed, and information has been added in response to comments on the Draft EIS and agency coordination. The Final EIS discusses the process that was used to select the Preferred Alternative, how comments were considered in the decision-making process, impacts and mitigation commitments.

Your preference for a more modern bullet train is noted; however, high-speed bullet trains are only appropriate for long-distance travel between cities. Because the train will stop approximately every mile, high-speed trains would not be able to accelerate to full speed then stop at the next station.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Alan E. Wickens
Ko Olina Fairways
92-1537 Aliinui Drive # E
Kapolei, Hawaii 96707-2230

3 December 2008

Wayne Yoshioka
Director of Transportation Services
City and County of Honolulu
650 South King Street, 3rd Floor
Honolulu, HI 96813

Re: Professor Prevedouros' Letter in the 2 Dec 2008 Star Bulletin (enclosed)

Dear Mr. Yoshioka,

The referenced letter poses sixteen points which should be answered by your Department. I anticipate your response in the Star Bulletin.

In addition to the Professors' points would you also tell us where the rail yard and maintenance shops will be located? Will the yard and shops require additional condemnations? Also, will HECO be the sole provider of power or will there be a dedicated power source? If there is a dedicated power source (or perhaps a back-up source) will it be dependent upon fossil fuel? Will the rail cars have batteries so that they can "creep" to the next station in case of loss of primary power?

Sincerely,

AEWicke

Cc: Councilman Apo
Star Bulletin

RECEIVED
2008 DEC 4 P 1:25
DEPT OF TRANSPORTATION SERVICES

Make sure you get the rail system you want

Panos Prevedouros

Regardless of whether you are for or against rail, the Draft Environmental Impact Statement (DEIS) is the document that should provide answers to all reasonable impacts. Does it? Here is a sample of questions:

>> The bus routes will change. What happens to your route? What happens to express buses?

>> Lanes will be taken away, some temporarily for construction and some permanently. Where are those lane closures and what's their duration? Are there traffic rerouting plans?

>> Will bikes, surfboards or luggage be allowed on the train? What about large items purchased at a big box retailer? What's the size limitation?

>> Will there be washrooms at the stations? How about convenience stores, vending machines? Will the platforms have seats? How many?

>> The plan calls for Aloun farms to relocate. Is that possible? Where will they go?

>> Sewer upgrades in Kailua and Kapiolani led to the loss of businesses and jobs. Are details provided about similar effects during the construction of the rail?

>> Rail construction involves unique skills and certifications that Hawaii construction workers do not have. How will this be addressed?

>> The city has declared that in many cases only a portion of a parcel needs to be condemned. Can the business survive with the remaining portion? Isn't this mandatory downsizing and fewer jobs?

>> There are 16 schools adjacent to the route. Will the overhead structure, the continuous high current exposure and the intermittent noise and vibration affect the learning environment? Would it be prudent to relocate these schools?

>> Does rail fit our Hawaiian sense of place? How was the impact to tourism and local quality of life by a large elevated structure through town been assessed?

>> Does the DEIS address the affected vistas and scenery? Are the aesthetics of the structure and each station explained and presented adequately?

>> What will happen in the event of a hurricane? Will the train operate? Light rail in Houston was shut down for 10 days due to Hurricane Ike.

>> BART in the Bay Area uses rail cars made of aluminum to combat corrosion. Is the city's position that corrosion is not an issue?

>> It appears that general excise tax surcharge proceeds for rail will be much lower than expected for at least four years in a row. How is this deficit going to be made up?

>> If ridership turns out to be much lower than forecast, then what? If the city is forced to provide free train rides like in Puerto Rico, how is the shortfall going to be covered?

>> Is there a detailed plan for the effect of rail construction on water, sewer, gas and electric utilities? Will there be disruptions of service? Does the budget cover all these?

I urge you to review the DEIS and seek answers to the questions that are important to you. Write to the city director of transportation with your questions and concerns and send copies to the City Council and the governor.

Regardless of whether you want rail or not, if the city builds the rail system, then make sure that it is done in a way that satisfies your needs and concerns.

Panos D. Prevedouros is a professor of transportation engineering at the University of Hawaii-Manoa. He ran an unsuccessful campaign for mayor as an anti-rail candidate.

AR00003541

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT12/08-290101R

Mr. Alan E. Wickens
92-1537 Aliinui Drive, #E
Kapolei, Hawaii 96707-2230

Dear Mr. Wickens

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

To address your questions, the potential locations of the maintenance and storage facility are shown in Figures 2-8 and 2-9 of the Final EIS. As stated in Section 4.17 of the Final EIS, two locations are being considered for the maintenance and storage facility: a 41-acre site in the proposed Hoopili development in Ewa and a 44-acre vacant site in Waipahu near Leeward Community College. Maps of these locations are provided in Figures 4-3 and 4-4 in the Final EIS. Depending on which location is used, property will need to be purchased. Right-of-way coordination will be ongoing with affected property owners.

The transit system will obtain electricity from the grid on Oahu and will be a customer of HECO. The transit system will require approximately 17.9 megawatts (MW) of electrical power to operate. This represents 1 percent of the existing combined electrical-generating capacity on Oahu by HECO and independent power producers. Renewable sources of electricity account

for 11 percent of the total electrical generation on the island. HECO is currently soliciting proposals for non-firm renewable-energy generating capacity of up to 100 MW that would be available between 2010 and 2014.

Since trains and rail stations will be electrically powered, the system's infrastructure is being designed to handle service disruptions. For example, trains will draw power from many points along the route so an outage in a few areas should not disrupt service. If electrical power is lost system-wide, then train brakes are designed to stop the rail cars even without power. Lights will stay on in trains and stations; backup batteries will provide lighting for several hours. The train operations center will communicate with passengers via the public address system and intercom to provide guidance. If power is restored within a short time, service will resume. With a prolonged outage, the operations center will direct passengers to exit the trains and walk along a lighted emergency walkway on the guideway to the nearest station. For those unable to exit rail cars, help will be provided by emergency responders and transit staff. Passengers will be met at the train station by a coordinated response from emergency responders and City transportation workers.

The following responses address comments from the article attached to your letter.

1) Changes to existing bus routes and description of new bus routes are included as Appendix D in the Final EIS. As noted in Section 2.5.6, of the Final EIS, bus service will be enhanced and the bus network will be modified to coordinate with the fixed guideway system. Some existing bus routes, including peak-period express buses, will be altered or eliminated to reduce duplication of services provided by the fixed guideway system.

2) As discussed in Section 3.5.7 of the Final EIS, a Maintenance of Traffic (MOT) Plan will be developed in advance by the contractor with approval from the City and the Hawaii Department of Transportation. The MOT Plan will identify measures to mitigate temporary construction-related effects on transportation and will address roadway closures for streets identified in Table 3-27 of the Final EIS. Unless unforeseen circumstances dictate, no designated major or secondary highway will be closed to vehicular or pedestrian traffic.

There will be no lanes lost to the Project at completion. One of the benefits of the elevated guideway is that it can be accommodated within the roadway median with relatively minor adjustments to the roadway to maintain traffic lanes as they are. Some lane widths will be reduced to accommodate column placement; however, this will not affect roadway capacity. Table 3-21 of the Final EIS presents information regarding the effects of column placement on streets and highways.

3) Rail vehicles will be designed to accommodate luggage, bicycles, and surfboards that do not interfere with the safety or comfort of other passengers and will be regulated by a policy to be developed by the City. Purchases from big-box stores and size limitations have not been specifically addressed at this time.

4) Each station will have a secured public restroom. Patrons will ask the station attendant for access to the restroom. DTS does not intend to compete with private enterprise by placing retail within stations. Final internal configurations of stations, including the location and amount of seating, will be completed as station planning is finalized.

5) The majority of the acres considered prime, unique, or of statewide importance are located at one of the two alternatives for a maintenance and storage facility. The other site, near Leeward Community College, is the site of a former Navy fuel drumming operation. This is the preferred site, and the City is working with the Navy and Department of Hawaiian Homelands to acquire it.

6) An analysis of the impacts to businesses during construction is provided in Section 4.18.1 of the Final EIS and in Section 5.2.2 of the Economics Technical Report. This report is available at the City and County of Honolulu and the Department of Transportation Services offices and on the project website at www.honolulutransit.org. The primary impacts are anticipated to result from inconveniences and disruptions to adjacent residents, businesses, and business customers that are inherent in any major construction project, which include the following:

- *Presence of construction workers and materials*
- *Temporary road closures and traffic diversions*
- *Temporary reductions in parking availability*
- *Airborne dust, noise, and vibrations*
- *Businesses' loss of visibility to their customers*

Section 4.18.1 of the Final EIS states that proposed mitigation to reduce adverse economic hardships for existing businesses along the project alignment during construction activities may include the following:

- *Coordinate construction planning and phasing with nearby property owners and businesses*
- *Develop a public involvement plan prior to construction to inform business owners of the construction schedule and activities*
- *Minimize the extent and number of businesses, jobs, and access affected during construction*
- *To the extent practicable, coordinate the timing of temporary facility closures to minimize impacts to business activities, especially those related to seasonal or high sales periods*

- *Minimize, as practical, the duration of modified or lost access to businesses*
- *Provide signage, lighting, or other information to indicate that businesses are open*
- *Provide public information (press releases, newsletters) regarding construction activities and ongoing business activities, including advertisements in print and on television and radio*
- *Phase construction in each area so as to maintain access to individual businesses for pedestrians, bicyclists, passenger vehicles, and trucks during business hours and important business seasons*
- *Provide advance notice if utilities will be disrupted and schedule major utility shutoffs during non-business hours*

Overall, the Project is projected to increase jobs in the nine years of construction to an average of about 10,000 per year (see Table 4-35 in Chapter 4).

7) Construction activities for the majority of the transit system are similar to roadway and building construction. Appendix E of the Final EIS details construction methods that are widely used for both rail transit and elevated highway construction and were employed on the H-3 Freeway. Experienced labor is locally available. A limited number of specialists will be needed to work with locally available labor in certain areas, such as transit power and signaling specialists working with local electricians to install system equipment.

8) It is true that in many locations, only partial property acquisitions are necessary. Every property acquisition is unique and will be addressed on a case-by-case basis. All property acquisitions will be conducted consistent with Federal and State regulations. Section 4.4.3 of the Final EIS 4.4.3 states: a partial acquisition typically is either a narrow strip of land or a more substantial portion of a large parcel. It is assumed that for the properties that will be partially acquired, existing land uses will not change.

9) There will be no noise impacts to schools for the Airport Alternative. The Project will have an integrated noise-blocking parapet wall at the edge of the guideway structure that extends for three feet above the top of the rail and a system specification for vehicles with wheel skirts.

10) The ongoing station area planning process involves numerous aspects of transit system design. The process addresses design and planning issues in an integrated manner and focuses on the characteristics and preferences of the communities adjacent to each station. The City is also conducting workshops with communities that will have rail stations. The purpose of the workshops is to engage the public about rail stations and provide opportunities to residents to

contribute ideas about the appearance of station entryways in their areas. Ideas generated at the workshops will be incorporated into the station planning process. For more information and to get involved in this process, please visit the project website at www.honolulutransit.org

11) The assessment of visual effect due to the Project as described in Section 4.8.3 of the Final EIS considers changes to the visual landscape and viewer responses to those changes. This includes the existing development along the Project alignment. Within the Project corridor the environment changes from rural at the Wai'anae end of the corridor to dense high-rise development at the Koko Head end.

As part of the design process, the City has developed design principles, which are identified in the Honolulu High-Capacity Transit Corridor Project Compendium of Design Criteria (RTD 2009m) that will be implemented in final design to minimize visual effects of the Project. For example, guideway materials and surface textures will be selected in accordance with generally accepted architectural principles to achieve effective integration between the guideway and its surrounding environment. Landscape and streetscape improvements will mitigate potential visual impacts, primarily for street-level views.

Other measures to address visual impacts of the Project are being developed through the station design and planning process. The initial station area plans and design guidelines were first developed with coordination between DTS and the Department of Planning and Permitting (DPP). The next level of transit station design focuses on integrating individual neighborhood characteristics of the communities served by the stations.
The following mitigation framework will be included in the Project to minimize negative visual effects and enhance the visual and aesthetic opportunities that it creates:

- *Develop and apply design guidelines that will establish a consistent design framework for the Project with consideration of local context.*
- *Coordinate the project design with City TOD planning and DPP.*
- *Consult with the communities surrounding each station for input on station design elements.*
- *Consider specific sites for landscaping and trees during the final design phase when plans for new plantings will be prepared by a landscape architect. Landscape and streetscape improvements will serve to mitigate potential visual impacts.*

Section 4.8.3 of the Final EIS, Design Principles and Mitigation includes information related to the mitigation framework described above. Specifically architecture and landscape design criteria include guidelines regarding site

design, materials and finishes, and lighting, which apply to stations, station areas, and the guideway.

12) The system will have an upper limit on operating wind speed. Vehicles will be stored during events that exceed the operating limit.

13) Transit vehicle specifications are being developed that are consistent with environmental considerations in Hawaii.

14) The financial discussions in the Final EIS address concerns about the uncertainties associated with financial markets. The capital plan for the Project is presented in Section 6.3 of the Final EIS, including a description of the amount of funding anticipated from various sources. The capital plan takes the current economic downturn into account. Section 6.6 of the Final EIS describes risks and uncertainties associated with these funding assumptions. The financial plan is a dynamic document that will be updated as conditions warrant.

15) Ridership discussions in the Final EIS address concerns about the uncertainties associated with ridership. Ridership projections for the forecast year of 2030 have been developed using the travel demand model, which was calibrated against collected traffic and transit ridership information and then validated against recent counts to be sure it properly represents travel activity in the transportation system (Section 3.2.1 of the Final EIS). An on-board transit survey was completed in December 2005 and January 2006, and the latest socioeconomic information available as of October 2008 was incorporated. Traffic counts were collected in 2005, 2007, and 2008. The model is based upon a set of realistic input assumptions regarding land use and demographic changes between now and 2030 and expected transportation levels-of-service on both the highway and public transit system. Based upon the model and these key input assumptions, approximately 116,300 trips per day are expected to use the rapid transit system on an average weekday in 2030. Since the Draft EIS was published, the travel demand model has been refined by adding an updated air passenger model (which forecasts travel in the corridor related to passengers arriving or departing at Honolulu International Airport), defining more realistic drive access modes (driving alone or car pooling) to project stations and recognizing a more robust off-peak non-home-based direct demand element (trips that do not originate at home) based on travel surveys in Honolulu.

The Project is one of the first in the country to design and undertake an uncertainty analysis of this type of travel forecast. The uncertainty analysis evaluates the variability of the forecast by establishing probabilistic upper and lower limits of ridership projections. FTA has worked closely with the City during this effort. A variety of factors was considered in the uncertainty analysis. Given all the factors considered, the anticipated limits for guideway ridership in 2030 is expected to be between 105,000 to 130,000 trips per day, bracketing the official forecast of 116,000 riders a day used for all calculations. A unified fare structure is planned, similar to the current structure for TheBus.

By City Council's current policy, ridership on the entire transit system is expected to pay for between 27 and 33 percent of the annual operating and maintenance costs. The City Council will adjust the fare to maintain that level of revenue. The balance of the operations costs will be part of the City's annual budget, which includes sources currently used for TheBus: Federal funding and subsidies from the City's General and Highway funds.

The amount of service provided will be scaled to generally match the demand. If the service attracts fewer riders than expected, then less service may be provided by adjusting headways or train length, resulting in lower-than-expected operating and maintenance costs. There is no plan to offer free ridership on the fixed guideway system.

16) Communication and coordination have been initiated with the affected utilities and will continue throughout design and construction. Part of the contractor's work plan will include the relocation of utilities when and where necessary, which will be included in the cost of the Project. Close and ongoing utility coordination will ensure that construction of transit facilities will proceed without disruption of utility service.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

018713

February 2, 2009

RECEIVED
09 FEB 6 P1:29
DEPT OF TRANSPORTATION SERVICES
DIRECTOR'S OFFICE

Department of Transportation Services
650 South King Street, 3rd Floor
Honolulu, Hawaii 96813

RE: Draft Environmental Impact Statement (DEIS)

Dear Sir or Madam:

As CPA's, we support **viable** and **affordable** traffic solutions for the City and County of Honolulu. We find several flaws regarding funding for the proposed rail project currently estimated to cost $5.5 billion for the airport route adopted on January 28, 2009 and summarized in Section 6 of the Draft Environmental Impact Statement (DEIS). We believe these flaws are of such magnitudes that not only will this project be neither viable nor affordable; this project will jeopardize our City and County's financial health and sustainability.

How realistic are the funding assumptions?

The basis for funding the proposed rail system is a 1/2% excise surcharge assessed on county transactions from January 1, 2007 to December 31, 2021. Using the City's figures provided in Section 6 of the DEIS, this surcharge needs to generate a minimum of $4.1 billion. The cash flow statement of the DEIS includes surcharge tax collections through 2023, two years past the 2021 collection expiration date provided by law. When the taxes for the additional two years are deleted from the City's projection, the required collections are short by $473.5 million (Exhibit A).

The collections from January 2007 to December 2008, total $294 million, substantially below the City's projections. It would require a minimum tax growth rate of 9.46% every year for thirteen (13) years (Exhibit B). Based on the Honolulu's economic history and the current global economy, this growth rate is unattainable.

What do the economists say?

The Council on Revenues (the economic board that provide forecasts of tax revenues to the Governor and State Legislators) issued new tax collection forecasts on January 12, 2009 (Exhibit C.) The forecast for growth in Hawaii tax revenues for 2009 through 2015 are -3.1%, 1%, 3.5%, 5.3%, 6%, 6.5%, and 6.5%. Using these forecasts, it would require an increase, compounded annually; in collections of 25.29% from 2016 to 2021 (Exhibit D). These forecasts do not include the additional cost for borrowing funds due to the shortfall in surcharge tax collections. This rate of required growth in tax collections is unattainable based on our economic history.

The funding should be based on the economic realities and reasonable factors:

1. 2007 and 2008: The actual surcharge collections
2. 2009 through 2015: The Council on Revenues forecasts
3. 2016 through 2021: Using a 6.5% growth rate of collections

Based on the above assumptions, the City will experience a **$1.26 billion shortfall** by the year 2021 (Exhibit E).

How much will the federal government contribute?

The DEIS estimates this rail project will cost approximately $5.5 billion, with $ 1.4 billion to be provided by the U.S. Department of Transportation. The federal funds are to be paid through their "New Starts" grants in the amount $200 million per year for seven [7] consecutive years. The 2009 budget for "new starts" is $1.475 billion for 30 grants that were selected from mass transit program applications from municipalities nationwide. The average grant is $47 million with two-thirds [2/3] of the grants going to cities with populations averaging 5.4 times the size of Honolulu. The average grant for smaller cities such as Honolulu is $23.5 million. There is great competition for these grants. The DEIS assumption that Honolulu will successfully obtain 1/7 of the country's mass transit budget for seven consecutive years is unrealistic and not viable.

What are the risks?

- Honolulu could have a rail system that is never completed. With no monies available to complete the project, the useless concrete pillars will be a monument to an irresponsible act that will mar our landscape for years to come.
- Honolulu's credit rating could plummet resulting in higher unbudgeted costs for interest on borrowed funds.
- Residents could face tax increases to pay for the shortage that will put undue economic pressure on them and future generations.
- Honolulu could be bankrupt due to all the debt that even future generations cannot service.

The City and County of Honolulu has a duty to its residents and taxpayers to act appropriately and prudently when committing our resources to traffic solutions. **The solutions must be viable and affordable.** We await your response to our concerns.

Very truly yours,

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DEPARTMENT OF TRANSPORTATION SERVICES

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT2/09-298713R

Mr. Joe Wikoff
Wikoff Combs & Co., LLC
American Savings Bank Tower
1001 Bishop Street, Suite 2760
Honolulu, Hawaii 96813

Dear Mr. Wikoff:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

The Final EIS includes General Excise and Use Tax (GET) surcharge collections through December 31, 2022, in accordance with City Ordinance 05-027 which established the 0.5 percent County surcharge on the GET through this date. As shown in Table 6-4 in the Final EIS, the net GET surcharge revenue will equal $3,524 million (YOE $). The analysis in Chapter 6 of the Final EIS takes the current economic downturn into account.

Section 6.6 of the Final EIS discusses risks and uncertainties associated with the funding assumptions for the Project. A subsection under Section 6.6.3 has been added since the Draft EIS was published to address the Council on Revenues' forecasts. As stated in this section, in the short-term, GET surcharge revenues are subject to uncertainties related to the magnitude and timing of the economic recovery on Oahu. Over the long-term, GET surcharge revenues on Oahu depend on a variety of underlying economic factors outside of the City's control that may result in a higher or lower projection than the one used in this EIS.

While GET surcharge collections have gone down, so too have the costs of the Project. However, if GET surcharge revenues and/or Federal funding are not sufficient to meet the cash-flow requirement to cover capital expenditures, other potential revenue sources will be developed to close the funding gap.

The financial plan is balanced for the entire Project so there will not be a situation in which only a portion of the system will be built. If there is a shortfall, additional revenue sources will be identified. As noted above, Section 6.6 of the Final EIS discusses risks and uncertainties, as well as the potential sources to cover shortfalls.

The magnitude and timing of Federal funding is one source of risk that is discussed in Chapter 6 of the Final EIS. Density and transit use in the corridor are among the highest in the nation and higher than most areas that have qualified for New Starts funding in recent years. This Project has been developed in coordination with FTA since its inception. There is no indication to suggest that the Project will not qualify for the Federal funding requested.

The financial plan was developed in consideration of safeguarding the City's credit rating in light of the likelihood of General Obligation bond sales required to bridge any year-by-year funding shortfalls, with all debt service costs paid with GET surcharge revenues, because FTA Section 5309 will pay for some financing costs. The New Starts funds are also proposed for a significant increase in the latest Federal budget proposal. Further, there has been no indication from the FTA that the requested amount is unreasonable or unrealistic.

As discussed in Section 6.4.2 of the Final EIS, the City's contribution to transit operation and maintenance is currently funded through Federal funding, fare revenues, and the City's General and Highway Funds. This funding will be used to fund operating and maintenance costs of the Project. The General Fund includes property tax revenues and other taxes and fees. Beyond collection of property taxes that fund City operations, for which the City develops rates on an annual basis and part of which will fund transit services, there is no anticipated impact to property taxes. Fixed guideway operation costs will represent between 2 and 3 percent of the City's annual operating budget. Property tax revenues are not expected to be used to fund construction of the Project.

The financial plan is structured to ensure Honolulu will not go bankrupt. The debt amount is a minor part of the Project at less than 10 percent.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
Creation Date :	2/6/2009
Creator Affiliation :	
First Name :	C. E.
Last Name :	Willson
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Add to Mailing List :	Standard
Submission Method :	Website
Other Submission Method :	
Submission Date :	02/06/2009

Submission Content/Notes : Noise Impacts:
It is unclear if you are using Cylindrical or Point Sources for noise calculations. Distance attenuation is significantly different for each (point source is 6dB per doubling, vs 3dB cylindrical). A train passing by a residence is cylindrical source. Please clarify this in the document. (The equivalent "sound of a leaf-blower" is not pleasant at 4 am.)

Where to start / MOS
The Draft EIS makes it clear that that the majority of ridership will be between home and school or work, and the vast majority of this is in the urban core between Waikiki and Pearl City, with the downtown area being the most common destination, and one which has severe parking limitations. So clearly, this is the area which would have the most ridership and should be built first, but the need to have space for a baseyard sways the development toward the Ewa end, where the intention is to spend years constructing a segment which is almost useless as a stand-along.
- Please discuss the areas which would generate the most immediate usage (and revenue).
- Please discuss economic collapse considerations, and how a partially-built rail system (e.g., East Kapolei to Waipahu) would be used if construction were to be halted if the project ran out of money.
- Please discuss the minimum segment which could operate as stand-along (e.g., Airport, downtown, and Ala Moana)

Please discuss the most fiscally cautious build-out which would allow operation of working segments, considering both dedicated (rail) options and flexible (elevated guideway for multi-purpose vehicles, which could accommodate bus-type vehicles and could allow conversion to rail once the complete system is in place.

Alternatives Analysis
- The public needs to be fully informed about the possible alternatives before proceeding, and the most attractive and realistic alternative was intentionally excluded from consideration, which makes the draft EIS unacceptable. Panos (and others) have provided articulate arguments for a drive-on, drive-off elevated guideway which provides multiple benefits.
- The system could bus-oriented and at-grade from Waianae or Haleiwa or Laie and then drive up on to the elevated guideway segment to bypass central corridor / downtown congestion, and continue at grade from Ala Moana to Waikiki or UH, which are the most heavily accessed end eastern end points. This means a single route from these origin and destination points can be easily managed, and express routes over such distances. Why is this not considered?
- Such a system would also allow door-to-door service for Handivan (ADA) service for the disabled and elderly, for emergency vehicles (ambulance, fire, police, rapid-response, military, etc.)
- The risk assessment should consider that this elevated roadway is not locked into one single technology, and even if the transit system fails completely, this system cen be used by any busses,and competing technologies.

Failure Modes and Downtime

• An esseential part of the discussion is failure modes. How could this go down?
• An elevated rail system is inherently a brittle technology, and if a segment of line goes down, the system could be totally out of commission. We are also proposing TOD to get people into car-free lifestyles, so people need to be able to feel they can rely on the system. We need a serious discussion of worker strikes, seismic events, terrorism, power failures, cost over-runs leading to the bankrupcy of the system, and other issues which could lead to a failure of the system. That is, a complete risk assessment for this and competing technologies. (Please do not say "that can't happen"; things do happen. Cost over-runs are extremely common, and this could become embroiled in lengthy litigation over cultural resources or burials, etc. (Look up "The Big Dig" for Boston's example ....)

What else can we get for our money?
The scenic vistas from many segments of an elevated guideway will be breathtaking.
Imagine the value of utilizing the service access route on the elevated guideway as a cross-town, no intersections bicycle route. People would want to bicycle to work. Imagine using this so you could walk or run across town without fear of traffic, with a breeze blowing across you, and clean air to breathe above the street-level traffic.
Imagine using this to get tourists to scenic areas at off-peak times.
Imagine using this to get visitors swiftly to and from the airport, seeing panoramic vistas from the Waianae mountains to Diamond Head along the way, instead of the freeway or Nimitz industrial corridor.
Imagine using this for a segment of the Honolulu Marathon, or bike races, or triathalons. Imagine Wide World of Sports following the leeders on live TV, with the beauty of the south O'ahu coastline behind them. Talk about massive free advertising for tourism! What wonderful events to run in the winter, when football season is over, and we can get TV coverage for beautiful Hawai'i weather while mainlanders are snowed in.
Imagine being able to rent a bicycle with a credit card swipe at transit stations and conveniently bike to wherever you want to go, and then relock it in the rental station closest to your destination, saving time, carrying items you purchased along the way – all without ever needing to own a bicycle.
Imagine a day off when the clouds are rolling toward your beach, so you hop on a train and pick up a bicycle to get to a sunny beach on the other side of the island.

This investment is something we will be using and paying for for over 50 years, perhaps 100. Please take your time and get this right, as it will shape the development of this island for generations.

Thank you for considering these options.

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-334809

C.E. Willson
225 Queen Street, 7F
Honolulu, Hawaii 96813

Dear C.E. Willson:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

This letter will address your comments in the same manner as your letter.

Noise Impacts:

The FTA Transit Noise Spreadsheet was used to calculate noise levels of the Project. The transit source is a linear noise source and will have a 3-dB distance attenuation per doubling of distance.

Project Limits:

The a.m. peak period and daily ridership information is forecasted for 2030 and shown in Figures 3-9 and 3-10 in the Final EIS. Figure 3-10 in the Final EIS shows boardings and alightings per station and indicates that the Ala Moana Station will have the highest daily

ridership on the system, followed by Pearl Highlands and East Kapolei. It is reasonable to assume that the stations with the highest ridership will also generate the highest revenue.

Regarding your second bullet point, the capital plan for the Project is presented in Section 6.3 of the Final EIS, including a description of the amount of funding anticipated from various sources. The capital plan takes the current economic downturn into account. Section 6.6 of the Final EIS describes risks and uncertainties associated with these funding assumptions. The financial plan is a dynamic document that will be updated as conditions warrant.

Regarding your third bullet point, the financial plan is balanced for the entire Project so there will not be a situation in which only a portion of the system will be built. If there is a shortfall, additional revenue sources will be considered. Section 6.6 of the Final EIS discusses risks and uncertainties, as well as potential sources to cover shortfalls.

Alternatives Analysis:

Chapter 2 of the Final EIS summarizes the alternatives screening and selection process. Beginning in the fall of 2005, an initial screening process considered alternatives identified through previous transit studies, a field review of the study corridor, an analysis of current population and employment data for the study corridor, a literature review of technology modes, ongoing work completed as part of the Oahu Regional Transportation Plan 2030 (ORTP) prepared by the Oahu Metropolitan Planning Organization (OahuMPO) (OahuMPO 2007), and public and agency comments received during the formal Alternatives Analysis scoping process.

The screening process is documented in the Honolulu High-Capacity Transit Corridor Project Alternatives Screening Memorandum (DTS 2006a). Three scoping meetings were held during the screening process in December 2005, which included a presentation of initial alternatives to the public, interested agencies, and officials to receive comments on the Purpose and Need, alternatives, and scope of the Alternatives Analysis. Refinements were made to the alternatives based on the public input during scoping.

After completion of screening in the winter of 2006, the following alternatives were studied in the Alternatives Analysis: No Build Alternative, Transportation System Management (TSM) Alternative, Managed Lane Alternative, and the Fixed Guideway Alternative. After review of the Alternatives Analysis Report and consideration of public comments, the City Council identified a fixed guideway transit system extending from Kapolei to UH Manoa with a connection to Waikiki as the Locally Preferred Alternative. This identification, which eliminated the TSM and Managed Lane Alternatives from further consideration, became Ordinance 07-001 on January 6, 2007. The NEPA process considered a range of alternatives that was consistent with the identified Locally Preferred Alternative. As discussed in Section 2.2, there were no alternatives that had not been previously studied and eliminated for good cause that would satisfy the Purpose and Need at less cost, with greater effectiveness, or less environmental or community impact.

The express-bus service described in your second bullet point does not serve any intermediate points. Also, if any portion of the bus trip is within mixed traffic flow, travel time reliability is less than for an exclusive right-of-way fixed guideway system.

As discussed in Chapter 2 of the Draft EIS, transit reliability would not have been improved except for express bus service operation in the managed lanes. While this alternative would have reduced congestion on parallel highways, system-wide traffic congestion would have been similar to the No Build Alternative as a result of increased traffic on arterials trying to access the facility. Total islandwide vehicle hours of delay (VHD) would have increased with the Managed Lane Alternative compared to the No Build Alternative, indicating an increase in system-wide congestion (Table 2-1 of the Final EIS). Therefore, TheHandiVan service, despite going door to door, would not have been improved with the Managed Lane Alternative.

Overall system reliability, considering all factors, for a fully grade-separated transit system is greater than for any system operating in mixed-flow conditions. System planning has considered power outages and other risks that could disable the system. The chance of a transit vehicle being stopped by a disabled vehicle is much greater in mixed-traffic flow, such as managed lanes, than in an exclusive right-of-way carrying only routinely maintained rail vehicles. In the event of a closure to the H-1 Freeway, a greater number of people will be accommodated by a fixed guideway transit system than in two highway lanes being used to detour traffic.

Other:

As discussed in the prior response, system planning has considered power outages and other risks that could disable the system. The Project does have a Safety and Security Committee that works on issues such as those raised in your letter. The elevated technology referred to is in place in a number of cities throughout the U.S. and around the world. It has operated with few problems, in some cases for over 100 years. The Bay Area Rapid Transit (BART) system in California, for example, functions in a much more active seismic environment than exists on Oahu and has withstood serious earthquakes with little, if any, disruption. In fact, it was BART that offered continued service during a time in 1989 when the I-880 freeway collapsed as a result of an earthquake. Elevated rail, like any rail system, is designed with enough redundancy to guard against most predictable events. That includes the design as well as operational elements of the Project.

The potential of worker strikes is a possible issue, but they can only be resolved with knowledge of the facts at the time of the occurrence. Since trains and rail stations will be electrically powered, the system's infrastructure is being designed to handle service disruptions. For example, trains will draw power from many points along the route, so an outage in a few areas should not disrupt service to other parts of the system. If electrical power is lost system-wide, then train brakes are designed to stop the rail cars even without power. Lights will stay on in trains and stations; backup batteries will provide lighting for several hours. The train operations center will communicate with passengers via the public address system and intercom to provide guidance. If power is restored within a short time, service will resume. With a prolonged outage, the operations center will direct passengers to exit the trains and walk along a lighted emergency walkway on the guideway to the nearest station. For those unable to exit rail cars, help will be provided by emergency responders and transit staff. Passengers will be met at the train station by a coordinated response from emergency responders and city transportation workers.

The Project is being designed to address concerns about seismic activity that could occur on the island. In addition, the Project is working closely with first responders regarding security. The system's safety and security program is under development, although it will be finalized before the fixed guideway system begins operation.

Cost overruns on transit projects have been curtailed dramatically over the past 10 to 15 years through a number of safeguards imposed by the FTA to prevent such problems. There is no guarantee that problems will not occur, but the process has been structured so as to prevent problems or identify them quickly if they do occur so that a solution can be provided and the Project can avoid the issues that other projects have faced.

The treatment of burial remains is being addressed currently to ensure that if iwi kupuna (Hawaiian burials) are found in advance of construction, they can be identified and protected or relocated before construction. This will provide better opportunity for families to provide for their ancestors and also help prevent project delays. This effort is being undertaken in cooperation with the Oahu Island Burial Council.

Lastly, a service access route will not be used as a bicycle facility. Bicycles will be allowed on trains, as regulated by a bicycle policy. In addition, every station will have racks where bicycles can be locked.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

K1"/08-2886Z2

Chang, Deanna

From: Leonard Withington, Jr [makikistop@yahoo.com]
Sent: Friday, November 21, 2008 4:43 PM
To: Chang, Deanna
Subject: pLEASE SUBMITT TO RECORD

'08 NOV 24 A9:15
DTS
RAPID TRANSIT

Thanks for taking my call. Testimony forthcoming
To the committee on Transportation and Public Works

November 15, 2008

SALT LAKE VS AIRPORT ROUTE (REAL SERVICE TO REAL COMMUTER USERS)

I wish you would listen to the Salt Lake/Ali'manu/Foster Village neighborhood board members testimony. They have spent a lot of effort to work with Romy C

History
For 18 years (1977 to 1996) I was a resident of Salt Lake. Back in the 70' and 80' Councilperson Donna Mercado Kim vastly improved the bus line #12 (Presently the #3.) Due to these great improvements, the Moanalua/Salt Lake/Ali'amanu communities improved real service to real commuter users. I have used mass transit for 14 years now. The service is excellent.

Airport/Hickam/Pearl Harbor History
We've always had poor bus service to this area. Only Nimitz and Kam highway service is used. Bus #19 to Airport/Hickam travels every hour To enter Hickam the rider must have a US Government ID on the bus. Bus #9 provides hourly service to Nimitz Gate only (Big deal). Bus #9 goes on the base only during the regular commute hours and must also have a Government ID.

The #20 and #42, plus the Kam highway routes go by the airport and Pearl Harbor, provide spotty airport visitor bus service. Luggage service on all busses is discouraged (restricted). Will visitors with luggage be allowed on hub and spoke bus service from Ala Moana Shopping Center to Waikiki hotels?

Market Analysis
I really think the survey which says that 7,000 more riders will use the Airport Route is flawed. I would think the Salt Lake corridor would be 7,000 more ridership than the

Airport route. Customers from Halawa Heights, Red Hill, Foster Village, Moanalua Valley, Salt Lake and Ma'punapuna would utilize the hub and spoke bus service to the Salt Lake Blvd rail corridor. They will not drive to Pearl Harbor or Damon Track (Airport) areas. What makes the high speed rail work is high speed between terminals and limited stops. I really think 19 stops are too many.

If you are going to have a hub and spoke bus service with "park and ride" facilities at the stations, you can cut back 5 – 6 stops, so that the 40 minute ride becomes a 30 or 35 minute commute to the bus transfer stations. Start to stop xxxxx Kapolei to AMC

Remember Express Route A. The original UH (Sinclair Library) to Kalihi Transit Center provided limited stops, every 10 minutes. This system worked real well. They then added the Waipahu final destination and put stops at McCully Kamakee, Kokea, Gulick streets slowing the service down. That really screwed up the A Express Route. Once again we need limited stops and high speed. The new rail route would be from Aloha Stadium to Iwilei is much faster than the airport.

Be real when it comes to moving the masses with speed
The successful mass transit systems should move all customers with speed. Why else have an expensive system. Proven good service will change most car riders to consider alternative forms of transportation.

Leonard Withington, Jr.
1326 Piikoi Street #202
Honolulu, HI 96814
e-mail makikistop@yahoo.com
(808) 535-9779

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010 RT11/08-288635R

Mr. Leonard Withington, Jr.
1326 Piikoi Street, #202
Honolulu, Hawaii 96814

Dear Mr. Withington:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

Per your first comment, all correspondence received on the Draft EIS has been reviewed and considered. Also, your preference for the Salt Lake Alternative has been noted. While each of the alternatives discussed in the Draft EIS includes trade-offs between benefits and impacts, the Airport Alternative from East Kapolei to Ala Moana has been selected as the Preferred Alternative as described above. As compared to the alternatives discussed in the Draft EIS, the Airport Alternative will carry the most passengers, provide the greatest transit-user benefits, and result in the fewest vehicle hours of delay. It will provide access to employment centers at Pearl Harbor Naval Base and Honolulu International Airport and will serve the Salt Lake neighborhood with connecting bus service. Of the three Build Alternatives addressed in the Draft EIS, the Airport Alternative will have slightly less impacts to the natural and built environment analyzed in the Draft EIS. During the public comment period on the Draft EIS, the public overwhelmingly supported the Airport Alternative. Of the comments that

specifically supported one of the alternatives, more than 75 percent were in support of the Airport Alternative. For more information this selection is discussed in Section 2.4 of the Final EIS. Since publication of the Draft EIS, design has been advanced, further analysis has been completed, and information has been added in response to comments on the Draft EIS and agency coordination. The Final EIS discusses the process that was used to select the Preferred Alternative, how comments were considered in the decision-making process, impacts and mitigation commitments.

Regarding allowing luggage onto the system, no change to luggage policy on TheBus is proposed at this time. The fixed guideway system will allow luggage, surfboards, and bicycles, subject to policies to be developed.

Under your topic of Market Analysis, you made several points which this letter will address. Figure 3-12 in the Draft EIS shows daily boardings and alightings at each station. As shown, the stations along the Airport Alternative will attract higher ridership than those along the Salt Lake Boulevard Alignment. The Airport Alternative will serve major employment destinations, such as Pearl Harbor, Hickham Air Force Base, and the Airport. The number of stations affects riders in two ways. If stations are too far apart, the system is not convenient as users would need to walk too long of a distance. If they are too near, the average travel speed is reduced. To balance these concerns, the average distance between stations is approximately one mile, with shorter distances in dense areas that have greater transit demand. The Project is designed to maximize transit travel time savings and reliability. Table 3-16 in the Final EIS provides station-to-station travel times. Since the fixed guideway system will operate independently from traffic, travel times will be the same at all times of the day, every day.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
Creation Date :	11/24/2008
Creator Affiliation :	
First Name :	Taryn
Last Name :	Wong
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Alternative Preference :	
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State :	HI
Zip Code :	96744
Email :	kerotw24@hotmail.com
Telephone :	
Telephone Extension :	
Add to Mailing List :	Email
Submission Method :	Website
Other Submission Method :	
Submission Date :	11/24/2008
Submission Content/Notes :	I am totally against the rail system. It is too expensive, will take too long to build, and will ruin our island. Hawaii does not even allow billboard signs and they want to put a rail up across our skyline? What are we going to do about traffic NOW until the year 2030? This is not a federally funded project, so how is Hawaii going to pay for this? Shouldn't we use the state money for our public schools?

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-330793

Ms. Taryn Wong
kerotw24@hotmail.com

Dear Ms. Wong:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

You opposition to the Fixed Guideway Transit Alternative is noted. Regarding construction, the Project is scheduled to open in phases beginning in 2012. As each segment is opened, the transportation benefits of the Project will increase. The completed 20-mile Project is anticipated to be fully operational by early 2019, as shown in Figure 2-42, Project Schedule, in the Final EIS.

This is a federally and locally funded project. The Project is following the Federal New Starts process in anticipation of receiving substantial Federal funds for construction. Federal funds have been appropriated for the Project. The General Excise and Use Tax (GET) surcharge enacted by the City Council will provide the remaining funds. On Oahu, the local funds raised by the GET surcharge can only be used for construction and operation of a fixed guideway project. The law forbids using the GET surcharge revenues to fund public schools or

any other purpose. While the State authorized the surcharge, the City imposes the surcharge. Please refer to Chapter 6 of the Final EIS for information regarding Project funding.

The FTA and DTS appreciate your interest in the Project. The Final EIS has been issued in conjunction with the distribution of this letter. You may view the Final EIS on the Project website at www.honolulutransit.org. You may request a DVD of the Final EIS and additional content through the "Contact Us" tab on the website or by calling the Project hotline at 566-2299. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Status :	Initial Action Needed
Creation Date :	2/6/2009
Creator Affiliation :	
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Last Name :	wong
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Telephone :	510-261-8313
Telephone Extension :	
Add to Mailing List :	None
Submission Method :	Website
Other Submission Method :	
Submission Date :	02/06/2009

Submission Content/Notes : To Whom It May Concern:

My concerns for the transit project are not so much with the rail itself, but rather the effects the rail will have on mixed-income development in its surrounding areas.

It is my understanding that government officials are looking to Hope VI projects to model our own mixed income redevelopment. In places like Oakland, Seattle, and across the country, this mixed income redevelopment has been paired with transit rail development. In Oakland for example, every station stop has become a site for mixed income redevelopment.

This has impacted low income residents in nearby areas tremendously. Oakland Coliseums mixed income development displaced 178 families, and only 4 families returned. This is consistent with Hope VI national statistics.

So I'd like to know what steps are being taken by the transit project to insure that this doesn't become the case on Oahu, especially in high-density areas like Kalihi-Palama. I urge you to consider these solutions:

1. Remove barriers for low-income residents to return to housing near the rail redevelopments
2. Ban no-fault evictions and criminal history disqualifications in areas near the rail
3. Ensure that the timing of the rail is not disruptive to existing residents
4. Ensure case management and social services attached to relocation counseling
5. Guarantee no net loss of affordable housing units in areas near the rail
6. Maintain rental affordability at current levels in areas near the rail
7. Ensure family and culturally appropriate amenities in all redevelopments connected to the rail

DEPARTMENT OF TRANSPORTATION SERVICES

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-334580

Mr. Thomas Wong
47-549 Hui Iwa Street
Kaneohe, Hawaii 96744

Dear Mr. Wong:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

As discussed in Section 4.6 of the Draft EIS, the effects of the Project on identified OahuMPO Environmental Justice (EJ) areas were analyzed in regard to how well the Project will serve the transportation needs of the identified EJ populations and communities of concern in comparison to all other population groups within the study corridor. No specific community will have diminished access or ability to use transit.

Planning and zoning around station areas will be established by the City's Department of Planning and Permitting (DPP) in compliance with the City's new transit-oriented development (TOD) ordinance 09-4. Reestablishment of affordable housing is the responsibility of the City. No affordable housing is removed due to the Project.

Your letter contained several considerations regarding no-fault evictions, criminal history disqualifications, and the ability for low-income residents to return to housing near potential rail development. Unfortunately, these requests are beyond the control of the DTS. In addition, the real estate market is affected by market forces beyond the scope of this Project.

However, to address your comment about disruption to existing residents, Section 4.17.2 of the Draft EIS discusses the construction-related effects on Communities and Neighborhoods. Effects will be temporary and could include dust, noise, and traffic disruption and diversion, as well as limited or temporarily lost access and parking to residences and businesses. Coordination and communication with affected communities and neighborhoods will continue throughout the construction process.

As discussed in Section 8.4 of the Final EIS, the City is conducting workshops with communities that will have rail stations. This is independent of the City's DPP TOD work. The purpose of the workshops is to engage the public about rail stations and provide residents opportunities to contribute ideas about the appearance of station entryways in their areas. Ideas generated at the workshops will be incorporated into the station planning process. For more information and to get involved in this process, please visit the project website at www.honolulutransit.org.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
Creation Date :	1/22/2009
Creator Affiliation :	
First Name :	Betty
Last Name :	Wood
Business/Organization :	
Address :	1980 Halekoa Drive
Alternative Preference :	
Apt./Suite No. :	
City :	Honolulu
State :	HI
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Email :	
Telephone :	
Telephone Extension :	
Add to Mailing List :	None
Submission Method :	Website
Other Submission Method :	
Submission Date :	01/22/2009
Submission Content/Notes :	I support the development of rapid transit for Honolulu. In my opinion: 1. the train should connect to the airport. 2. construction start with the Pearl City to Honolulu segment and then build out. You'll get more riders immediately. 3. all stations should have elevators or ramps for wheel chairs and bikes. 4. all trains should have bike storage areas. 5. all new transit oriented development zoning changes should support pedestrian and bike access. Good luck.

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-334265

Ms. Betty Wood
1980 Halekoa Drive
Honolulu, Hawaii 96821

Dear Ms. Wood:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments in the order listed regarding the above-referenced submittal:

1. *Your preference for the Airport Alternative has been noted. While each of the alternatives discussed in the Draft EIS includes trade-offs between benefits and impacts, the Airport Alternative from East Kapolei to Ala Moana has been selected as the Preferred Alternative as described above. As compared to the alternatives discussed in the Draft EIS, the Airport Alternative will carry the most passengers, provide the greatest transit-user benefits, and result in the fewest vehicle hours of delay. It will provide access to employment centers at Pearl Harbor Naval Base and Honolulu International Airport and will serve the Salt Lake neighborhood with connecting bus service. Of the three Build Alternatives addressed in the Draft EIS, the Airport Alternative will have slightly less impacts to the natural and built environment analyzed in the Draft EIS. During the public comment period on the Draft EIS, the public overwhelmingly supported the Airport*

Alternative. Of the comments that specifically supported one of the alternatives, more than 75 percent were in support of the Airport Alternative. For more information this selection is discussed in Section 2.4 of the Final EIS. Since publication of the Draft EIS, design has been advanced, further analysis has been completed, and information has been added in response to comments on the Draft EIS and agency coordination. The Final EIS discusses the process that was used to select the Preferred Alternative, how comments were considered in the decision-making process, impacts and mitigation commitments.

2. *As described in Section 2.5.10, Project Phasing, and further in Section 8.6.9, Construction Phasing, in the Final EIS, to support phased opening, the first construction phase must be connected to a maintenance and storage facility, which requires considerable space. No location has been identified closer to Downtown with sufficient available space to construct a maintenance and storage facility. Therefore, construction will begin between East Kapolei and Leeward Community College. The Project will be constructed in phases to accomplish the following:*

    - *Match the anticipated schedule for right-of-way acquisition and utility relocations.*
    - *Reduce the time that each area will experience traffic and community disturbances.*
    - *Allow for multiple construction contracts with smaller contract size to promote more competitive bidding.*
    - *Match the rate of construction to what can be maintained with local workforce and available financial resources.*
    - *Balance expenditure of funds to minimize borrowing.*

The portion of the corridor in the Ewa direction of Pearl Highlands is less developed than the areas in the Koko Head direction. Right-of-way can be obtained more quickly at the west end of the Project; therefore, overall project construction can begin earlier, resulting in lower total construction costs. Construction is planned to continue uninterrupted in the Koko Head direction from Pearl Highlands to Aloha Stadium, Kalihi, and finally to Ala Moana Center.

As portions of the Project are completed, each will be opened incrementally so that system benefits, even if limited during the initial phases, will be realized prior to completion of construction of the entire Project.

3. *Access to all stations will meet Americans with Disabilities Act requirements, including elevators and escalators.*

4. *Bicycles will be allowed and accommodated on the system and regulated by a bicycle policy. In addition, all stations will have parking areas for bicycles.*

5. *The Honolulu High-Capacity Transit Corridor Project (the Project) is focused exclusively on the construction and implementation of rail transit service, and that is what is covered in the Final EIS. As stated in Chapter 4, Section 4.19.2 of the Final EIS, transit oriented development (TOD) will be expected to occur in project station areas as an indirect effect of the Project. Planning and zoning around station areas will be conducted by the City's Department of Planning and Permitting under a process covered by the City's new TOD ordinance.*

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Department of Transportation 12/8/08
650 South KING Street, 3rd Floor]
Honolulu, HI 96813

Dear Mayor of Honolulu: 12/6/08

It is time that the State took a position on the economic feasibility of rail rapid transit. The bill for elevated transit became law without the signature of the Govenor. The public vote on rail was close. and forecast future dissension. Subsequently, the visitor count has gone down, while the estimated cost of rail transit has gone up. The State has the responsibility to consider the impact of these developments on the future of rail transit, and to report to the

publlic,

The Govenor must take a position on the economic feasibility of rail transit before he can sign the draft Environmental Impact Statement into law. Please tell him so, orally or in writing, and that the former State Director of Transportation for Govenors Burns and Ariyoshi said so.

I have been a Democrat for 99.8 years

Sincerely, E. Alvey Wright

E, Alvey Wright

AR00003576

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT12/08-290976R

Mr. E. Alvey Wright
45-090 Namoku Street
Apartment 914
Kaneohe, Hawaii 96744

Dear Mr. Wright:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraph addresses your comments regarding the above-referenced submittal:

The Project is being undertaken by the City and County of Honolulu and the Federal Transit Administration, not the State of Hawaii. The Governor's acceptance of the EIS will conclude the Hawaii HRS Chapter 343 environmental review process.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
Creation Date :	1/31/2009
Creator Affiliation :	
First Name :	Michelle
Last Name :	Yamaguchi
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Telephone :	808.732.0046
Telephone Extension :	
Add to Mailing List :	Email
Submission Method :	Website
Other Submission Method :	
Submission Date :	01/31/2009
Submission Content/Notes :	Please tell me it's not true that the first leg of the transit to be built will run from Kapolei to Ewa/Ewa Beach. That would be silly and ridiculous.

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, 3RD FLOOR
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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT10/09-338270

Ms. Michelle Yamaguchi
956 Hunakai Street
Honolulu, Hawaii 96816

Dear Ms. Yamaguchi:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraph addresses your comments regarding the above-referenced submittal:

The first phase of the Project will not run from Kapolei to Ewa/Ewa Beach. As described in Section 2.5.10, Project Phasing, and further in Section 8.6.9, Construction Phasing, in the Final EIS, to support phased opening, the first construction phase must be connected to a maintenance and storage facility, which requires considerable space. No location has been identified closer to Downtown with sufficient available space to construct a maintenance and storage facility. Therefore, construction will begin between East Kapolei and Leeward Community College. The Project will be constructed in phases to accomplish the following:

- *Match the anticipated schedule for right-of-way acquisition and utility relocations.*

- *Reduce the time that each area will experience traffic and community disturbances.*
- *Allow for multiple construction contracts with smaller contract size to promote more competitive bidding.*
- *Match the rate of construction to what can be maintained with local workforce and available financial resources.*
- *Balance expenditure of funds to minimize borrowing.*

The portion of the corridor in the Ewa direction of Pearl Highlands is less developed than the areas in the Koko Head direction. Right-of-way can be obtained more quickly at the west end of the Project; therefore, overall project construction can begin earlier, resulting in lower total construction costs. Construction is planned to continue uninterrupted in the Koko Head direction from Pearl Highlands to Aloha Stadium, Kalihi, and finally to Ala Moana Center.

As portions of the Project are completed, each will be opened incrementally so that system benefits, even if limited during the initial phases, will be realized prior to completion of construction of the entire Project.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
Creation Date :	12/25/2008
Creator Affiliation :	
First Name :	Earl
Last Name :	Yamasaki
Business/Organization :	
Address :	859 Papalalo Place
Alternative Preference :	
Apt./Suite No. :	
City :	Honolulu
State :	HI
Zip Code :	96825
Email :	earlyamasaki@hotmail.com
Telephone :	294-2096
Telephone Extension :	
Add to Mailing List :	Both
Submission Method :	Website
Other Submission Method :	
Submission Date :	12/25/2008
Submission Content/Notes :	Instead of building a rail, we should use the funds for education, fixing, improving roads and higher capacity or more buses to make it more convenient for riders. Why gamble and spend so much money for rail without knowing the results. What if you don't have the desired results? You are stuck with a white elephant. Get more buses on the routes and make it so convenient that people will gladly ride it. If it does not work you won't have a white elephant to deal with. Residents on Oahu are very used to convenience and they won't ride the rail if they have to run errands or drop their children off at school, etc. We need to invest in our keiki and give them the chance to succeed. Fix our terrible roads. Please give this some thought. Mahalo.

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, 3RD FLOOR
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Phone: (808) 768-8305 • Fax: (808) 768-4730 • Internet: www.honolulu.gov

MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-332255

Mr. Earl Yamasaki
859 Papalalo Place
Honolulu, Hawaii 96825

Dear Mr. Yamasaki:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

You comments regarding how the City should use the General Excise and Use Tax (GET) funds is noted; however, the enabling legislation for the GET Surcharge precludes the use of the collected funds for anything other than a new transit system. In addition, the enabling legislation for the GET also precludes the use of the collected funds for education or other child-related issues. However, the Project will provide additional travel options for children and enhance mobility throughout the corridor, helping to create access for educational and employment opportunities for the community

Your comments regarding the system have been noted. As stated in Chapter 3 of the Final EIS, "Adding substantial passenger capacity with more buses is not feasible in some key locations along the system because of roadway capacity constraints. Choke points occur in Downtown Honolulu during the a.m. peak period, especially at the merger of North Beretania,

North King, and Liliha Streets, and Dillingham Boulevard and along Hotel Street. King Street has been used to introduce new service in recent years due to the capacity limitation of Hotel Street; however, choke points occur at the Chinatown bus stops and at the Punchbowl Street and King Street stops. Buses often must wait to move into an open and safe boarding position. Continuing to add additional service to King Street without major physical improvements would add to the gridlock in this corridor, deteriorate transit service, and complicate pedestrian and traffic safety issues. In the p.m. peak period, choke points occur along Beretania Street, Hotel Street, Nimitz Highway, and Ala Moana Boulevard in the Downtown area." For buses operating on the remainder of the island, most of the service will be in mixed traffic that will be subject to increased delays. This compares with the rail service that will be operating on an exclusive guideway completely separated from traffic.

With the Project, bus service will be enhanced and modified to coordinate with the fixed guideway system. Some existing bus routes will be altered or eliminated to reduce duplication of services provided by the fixed guideway system. Buses removed from service in the study corridor will be shifted to service in other parts of the island. Certain local routes will be rerouted to provide frequent and reliable connections to the nearest fixed guideway station. Existing and future routes, including route numbers and frequency, are included in Appendix D of the Final EIS.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
Creation Date :	11/17/2008
Creator Affiliation :	
First Name :	Kenneth
Last Name :	Yoshida
Business/Organization :	
Address :	1516 Hoolehua Street
Apt./Suite No. :	
City :	Pearl City
State :	HI
Zip Code :	96782
Email :	kkyoshid@juno.com
Telephone :	808-455-9442
Telephone Extension :	
Add to Mailing List :	Both
Submission Method :	Website
Other Submission Method :	
Submission Date :	11/17/2008
Submission Content/Notes :	I have a compromise route which includes part of the Salt Lake and Airport routes. Have the route continue from Pearl City/Aiea to the Aloha Stadium (park & ride) then onto Bougainville Drive and Radford Drive to the Pearl Harbor Naval Base. Then onto Nimitz and the Airport.

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-330549

Mr. Kenneth Yoshida
1516 Hoolehua Street
Pearl City, Hawaii 96782

Dear Mr. Yoshida:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

While each of the alternatives discussed in the Draft EIS includes trade-offs between benefits and impacts, the Airport Alternative from East Kapolei to Ala Moana has been identified as the Preferred Alternative as described above. Compared to the other alternatives discussed in the Draft EIS, the Airport Alternative will carry the most passengers, provide the greatest transit-user benefits, and result in the fewest vehicle hours of delay. It will provide access to employment centers at Pearl Harbor Naval Base and Honolulu International Airport and will serve the Salt Lake neighborhood with connecting bus service. Of the three Build Alternatives addressed in the Draft EIS, the Airport Alternative will have slightly lower impacts to the natural and built environment. During the public comment period on the Draft EIS, the public overwhelmingly supported the Airport Alternative. Of the comments that specifically supported one of the alternatives, more than 75 percent were in support of the Airport Alternative.

The Alternatives Analysis phase, which preceded the EIS process, is documented in Chapter 2 of the Final EIS. It evaluated a range of modal and general alignment alternatives, in terms of their costs, benefits, and impacts. The scoping process for the Alternatives Analysis involved a presentation of the viable alternatives to the public and interested public agencies and officials to receive comments on the Purpose and Need, alternatives, and scope of the analysis.

Scoping for the EIS followed the FTA process that provides for a culling of alternatives studied in the EIS through an Alternatives Analysis. The scoping process initiated for the Alternatives Analysis included a variety of highway, bus and fixed guideway options for consideration. During the later scoping effort for the EIS, the public was requested to propose alternatives that would satisfy the purpose and need at less cost or with greater effectiveness, less environmental or community impact and to propose alternatives that were not previously studied and eliminated for good cause. The only alternative that emerged that met these criteria was a fixed-guideway alternative following several alternative alignments. All reasonable alternatives that emerged from these processes were ultimately evaluated in the Draft and Final EISs.

Since publication of the Draft EIS, design has been advanced, further analysis has been completed, and information has been added in response to comments on the Draft EIS and agency coordination. The Final EIS discusses the process that was used to select the Preferred Alternative, how comments were considered in the decision-making process, impacts, and mitigation commitments.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
Creation Date :	11/20/2008
Creator Affiliation :	
First Name :	Ken
Last Name :	Yoshida
Business/Organization :	
Address :	1516 Hoolehua Street
Alternative Preference :	Neither
Apt./Suite No. :	
City :	Pearl City
State :	HI
Zip Code :	96782
Email :	kkyoshid@juno.com
Telephone :	808-455-9442
Telephone Extension :	
Add to Mailing List :	Both
Submission Method :	Website
Other Submission Method :	
Submission Date :	11/20/2008
Submission Content/Notes :	Here is a compromise route. Have the rail continue from Pearl City/Aiea on the Salt Lake route with a stop at Aloha Stadium (park & ride). Then onto Bouganville with at stop at the old Costco (park & ride). Then onto Radford Drive and continue on the airport route with at stop at Pearl Harbor. I submitted this compromise route on 11/17/08 via email and have yet to receive a response or acknowledgement. I would appreciate a confirmation when you receive my email. Mahalo, Ken Yoshida

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

May 21, 2010

RT9/09-330576

Mr. Kenneth Yoshida
1516 Hoolehua Street
Pearl City, Hawaii 96782

Dear Mr. Yoshida:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraph addresses comments regarding the above-referenced submittal:

Several alignments were considered during the Alternatives Analysis, including an alignment serving both the Airport and Salt Lake areas. Challenging issues associated with directly serving the Airport, including crossing U.S. Department of the Navy property and crossing the H-1 Freeway, made such options impractical. Also, crossing Navy property was rejected by the Navy.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Issuance of the Record of Decision under NEPA and acceptance of the Final EIS by the

Governor of the State of Hawaii are the next anticipated actions and will conclude the environmental review process for this Project.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Action Completed
Creation Date :	11/12/2008
Creator Affiliation :	
First Name :	josalyne
Last Name :	
Business/Organization :	
Address :	
Apt./Suite No. :	
City :	
State :	HI
Zip Code :	96814
Email :	
Telephone :	
Telephone Extension :	
Add to Mailing List :	None
Submission Method :	Website
Other Submission Method :	
Submission Date :	11/12/2008
Submission Content/Notes :	I think routing the initial rail line to the Airport instead of through Salt Lake is unwise. I would imagine that riders going to/from the airport would have luggage/baggage, so traveling by rail (or other public transportation) would be cumbersome and difficult, and people would be less willing to take public transportation to the Airport. (For instance, whenever I travel to New York City, Boston, or Washington, DC, I never take the subway/T/metro from the airport because with luggage it is just too much of a hassle!) I believe a route through Salt Lake would be more beneficial initially to service the numerous residents there, and expansions to include the (more expensive) Airport route could be decided at a later time.

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-330431

Josalyne
(No address or e-mail provided)

Dear Josalyne:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

Your preference for the Salt Lake Alternative has been noted. While each of the alternatives discussed in the Draft EIS includes trade-offs between benefits and impacts, the Airport Alternative from East Kapolei to Ala Moana has been selected as the Preferred Alternative as described above. As compared to the alternatives discussed in the Draft EIS, the Airport Alternative will carry the most passengers, provide the greatest transit-user benefits, and result in the fewest vehicle hours of delay. It will provide access to employment centers at Pearl Harbor Naval Base and Honolulu International Airport and will serve the Salt Lake neighborhood with connecting bus service. Of the three Build Alternatives addressed in the Draft EIS, the Airport Alternative will have slightly less impacts to the natural and built environment analyzed in the Draft EIS. During the public comment period on the Draft EIS, the public overwhelmingly supported the Airport Alternative. Of the comments that specifically supported one of the alternatives, more than 75 percent were in support of the Airport Alternative. For more information this selection is discussed in Section 2.4 of the Final EIS. Since publication of the Draft EIS, design has been advanced, further analysis has been completed, and information has

been added in response to comments on the Draft EIS and agency coordination. The Final EIS discusses the process that was used to select the Preferred Alternative, how comments were considered in the decision-making process, impacts and mitigation commitments.

The travel demand forecasting model for the Project did have an air passenger component. As shown in Table 3-12 of the Final EIS, there will be about 103,900 daily trips by air passengers in 2030 of which 3,500 (3.4 percent) will use transit (bus and rail). Without the Project, only 1,200 daily trips by air passengers would have used transit to travel to or from the airport (or 1.2 percent).

The FTA and DTS appreciate your interest in the Project. The Final EIS has been issued in conjunction with the distribution of this letter. You may view the Final EIS on the Project website at www.honolulutransit.org. You may request a DVD of the Final EIS and additional content through the "Contact Us" tab on the website or by calling the Project hotline at 566-2299. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Status :	Initial Action Needed
Creation Date :	11/20/2008
Creator Affiliation :	
First Name :	
Last Name :	
Business/Organization :	
Address :	
Alternative Preference :	Airport
Apt./Suite No. :	
City :	
State :	HI
Zip Code :	96816
Email :	
Telephone :	
Telephone Extension :	
Add to Mailing List :	None
Submission Method :	Website
Other Submission Method :	
Submission Date :	11/20/2008
Submission Content/Notes :	I believe the rail route should extend to the airport. It doesn't make sense to build the rail if it doesn't include an airport stop. If it's going to (finally) be done, it should be done right. And the state should help finance the project since they will benefit from the rail, especially if it extends to the airport.

DEPARTMENT OF TRANSPORTATION SERVICES

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-330554

Anonymous
(No address or e-mail provided)

Dear Anonymous Commenter:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

Your preference for the Airport Alternative has been noted. While each of the alternatives discussed in the Draft EIS includes trade-offs between benefits and impacts, the Airport Alternative from East Kapolei to Ala Moana has been selected as the Preferred Alternative as described above. As compared to the alternatives discussed in the Draft EIS, the Airport Alternative will carry the most passengers, provide the greatest transit-user benefits, and result in the fewest vehicle hours of delay. It will provide access to employment centers at Pearl Harbor Naval Base and Honolulu International Airport and will serve the Salt Lake neighborhood with connecting bus service. Of the three Build Alternatives addressed in the Draft EIS, the Airport Alternative will have slightly less impacts to the natural and built environment analyzed in the Draft EIS. During the public comment period on the Draft EIS, the public overwhelmingly supported the Airport Alternative. Of the comments that specifically supported one of the alternatives, more than 75 percent were in support of the Airport Alternative. For more information this selection is discussed in Section 2.4 of the Final EIS. Since publication of the

Draft EIS, design has been advanced, further analysis has been completed, and information has been added in response to comments on the Draft EIS and agency coordination. The Final EIS discusses the process that was used to select the Preferred Alternative, how comments were considered in the decision-making process, impacts and mitigation commitments.

The travel demand forecasting model for the Project did have an air passenger component. As shown in Table 3-12 of the Final EIS, there will be about 103,900 daily trips by air passengers in 2030 of which 3,500 (3.4 percent) will use transit (bus and rail). Without the Project, only 1,200 daily trips by air passengers would have used transit to travel to or from the airport (or 1.2 percent).

Chapter 6 of the Final EIS discusses potential funding sources for the Project.

The FTA and DTS appreciate your interest in the Project. The Final EIS has been issued in conjunction with the distribution of this letter. You may view the Final EIS on the Project website at www.honolulutransit.org. You may request a DVD of the Final EIS and additional content through the "Contact Us" tab on the website or by calling the Project hotline at 566-2299. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Status :	Initial Action Needed
Creation Date :	11/20/2008
Creator Affiliation :	
First Name :	
Last Name :	
Business/Organization :	
Address :	
Apt./Suite No. :	
City :	Honolulu
State :	HI
Zip Code :	96815
Email :	mar_fsi@hotmail.com
Telephone :	
Telephone Extension :	
Add to Mailing List :	None
Submission Method :	Website
Other Submission Method :	
Submission Date :	11/20/2008
Submission Content/Notes :	The referndum passed, so take the time to plan the most critical and cost efficient lines/stations for the economic and environmental health of Honolulu. Include the airport, UH - Manoa, and Waikiki in the first tranche of construction. The taxpayers will reap the best return for their investments in terms of ridership and increased tourist dollars. The allure of rapid transit from the POE (airport) to the final destination (Waikiki) for visitors can not be underestimated. A spur to UH - Manoa is also a no-brainer. Students crave fast, affordable transportation, with the benefit of no parking hassles. Build this transit system the right way - from the start!

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-330580

mar_fsi@hotmail.com

Dear Concerned Citizen:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraph addresses your comments regarding the above-referenced submittal:

As described in Section 2.5.10, Project Phasing, and further in Section 8.6.9, Construction Phasing, in the Final EIS, to support phased opening, the first construction phase must be connected to a maintenance and storage facility, which requires considerable space. No location has been identified closer to Downtown with sufficient available space to construct a maintenance and storage facility. Therefore, construction will begin between East Kapolei and Leeward Community College. The Project will be constructed in phases to accomplish the following:

- *Match the anticipated schedule for right-of-way acquisition and utility relocations.*
- *Reduce the time that each area will experience traffic and community disturbances.*

- *Allow for multiple construction contracts with smaller contract size to promote more competitive bidding.*
- *Match the rate of construction to what can be maintained with local workforce and available financial resources.*
- *Balance expenditure of funds to minimize borrowing.*

The portion of the corridor in the Ewa direction of Pearl Highlands is less developed than the areas in the Koko Head direction. Right-of-way can be obtained more quickly at the west end of the Project; therefore, overall project construction can begin earlier, resulting in lower total construction costs. Construction is planned to continue uninterrupted in the Koko Head direction from Pearl Highlands to Aloha Stadium, Kalihi, and finally to Ala Moana Center.

As portions of the Project are completed, each will be opened incrementally so that system benefits, even if limited during the initial phases, will be realized prior to completion of construction of the entire Project.

The FTA and DTS appreciate your interest in the Project. The Final EIS has been issued in conjunction with the distribution of this letter. You may view the Final EIS on the Project website at www.honolulutransit.org. You may request a DVD of the Final EIS and additional content through the "Contact Us" tab on the website or by calling the Project hotline at 566-2299. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Status :	Initial Action Needed
Creation Date :	11/24/2008
Creator Affiliation :	
First Name :	
Last Name :	
Business/Organization :	
Address :	
Alternative Preference :	Airport
Apt./Suite No. :	
City :	
State :	HI
Zip Code :	96818
Email :	
Telephone :	
Telephone Extension :	
Add to Mailing List :	None
Submission Method :	Website
Other Submission Method :	
Submission Date :	11/24/2008
Submission Content/Notes :	I voted against rail but since we have to move ahead let's do it right and go the airport route. It's a no- brainer, more riders and revenue. Salt Lake make very little sense at all.

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-330586

Anonymous
(No address or e-mail provided)

Dear Anonymous Commenter:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraph addresses your comments regarding the above-referenced submittal:

Your preference for the Airport Alternative has been noted. While each of the alternatives discussed in the Draft EIS includes trade-offs between benefits and impacts, the Airport Alternative from East Kapolei to Ala Moana has been selected as the Preferred Alternative as described above. As compared to the alternatives discussed in the Draft EIS, the Airport Alternative will carry the most passengers, provide the greatest transit-user benefits, and result in the fewest vehicle hours of delay. It will provide access to employment centers at Pearl Harbor Naval Base and Honolulu International Airport and will serve the Salt Lake neighborhood with connecting bus service. Of the three Build Alternatives addressed in the Draft EIS, the Airport Alternative will have slightly less impacts to the natural and built environment analyzed in the Draft EIS. During the public comment period on the Draft EIS, the public overwhelmingly supported the Airport Alternative. Of the comments that specifically supported one of the alternatives, more than 75 percent were in support of the Airport Alternative. For more information this selection is discussed in Section 2.4 of the Final EIS. Since publication of the Draft EIS, design has been advanced, further analysis has been completed, and information has

been added in response to comments on the Draft EIS and agency coordination. The Final EIS discusses the process that was used to select the Preferred Alternative, how comments were considered in the decision-making process, impacts and mitigation commitments.

The travel demand forecasting model for the Project did have an air passenger component. As shown in Table 3-12 of the Final EIS, there will be about 103,900 daily trips by air passengers in 2030 of which 3,500 (3.4 percent) will use transit (bus and rail). Without the Project, only 1,200 daily trips by air passengers would have used transit to travel to or from the airport (or 1.2 percent).

The FTA and DTS appreciate your interest in the Project. The Final EIS has been issued in conjunction with the distribution of this letter. You may view the Final EIS on the Project website at www.honolulutransit.org. You may request a DVD of the Final EIS and additional content through the "Contact Us" tab on the website or by calling the Project hotline at 566-2299. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Status :	Initial Action Needed
Creation Date :	11/25/2008
Creator Affiliation :	
First Name :	
Last Name :	
Business/Organization :	
Address :	
Alternative Preference :	
Apt./Suite No. :	
City :	
State :	HI
Zip Code :	96778
Email :	pukanala@ptd.net
Telephone :	
Telephone Extension :	
Add to Mailing List :	None
Submission Method :	Website
Other Submission Method :	
Submission Date :	11/25/2008
Submission Content/Notes :	My Opinion: Ten years from now when the keiki's grow up and the populace has grown the problem will be the same as it is now. When I see the island chain on the map, it looks like a big band-aid. Change the driving age? Limit the no. of cars per familly? This deal is all about money and jobs to keep Hawaii fluid not about alleviating the traffic problem. If the rail absorbs 22% of the traffic now, what is the percentage for ten years from now? My guess is it will be ground hog day.

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-330866

Concerned Citizen
pukanala@ptd.net

Dear Concerned Citizen:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall indentify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraph addresses your comments regarding the above-referenced submittal:

Your opinion has been noted. The roadway system will continue to experience congestion in 2030, but it will be substantially less than if the Project were not built. Based upon the analysis contained within the Final EIS, the Project will reduce island-wide congestion compared to the No Build Alternative by 18 percent as measured by daily vehicle hours of delay (as shown in Table 3-14 of the Final EIS). The proposed measures of changing the driving age or limiting the number of cars per family do not address the desire for individual mobility. The proposed measures are also beyond the scope of the authority of the Project and not within the authority of the City and County of Honolulu Department of Transportation Services Rapid Transit Division.

The FTA and DTS appreciate your interest in the Project. The Final EIS has been issued in conjunction with the distribution of this letter. You may view the Final EIS on the Project website at www.honolulutransit.org. You may request a DVD of the Final EIS and additional content through the "Contact Us" tab on the website or by calling the Project hotline at 566-2299.

Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Status :	Initial Action Needed
Creation Date :	12/7/2008
Creator Affiliation :	
First Name :	
Last Name :	
Business/Organization :	
Address :	2345 Ala Wai Blvd
Alternative Preference :	
Apt./Suite No. :	1601
City :	Honolulu
State :	HI
Zip Code :	96815
Email :	
Telephone :	
Telephone Extension :	
Add to Mailing List :	None
Submission Method :	Website
Other Submission Method :	
Submission Date :	12/07/2008
Submission Content/Notes :	I am heavily in favor of an initial rail route which services the airport. The importance of solid connections between HNL and the rest of the island cannot be overstated.

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-331306

Concerned Citizen
2345 Ala Wai Boulevard, Suite 1601
Honolulu, Hawaii 96815

Dear Concerned Citizen:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall indentify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraph addresses your comments regarding the above-referenced submittal:

Your preference for the Airport Alternative has been noted. While each of the alternatives discussed in the Draft EIS includes trade-offs between benefits and impacts, the Airport Alternative from East Kapolei to Ala Moana has been selected as the Preferred Alternative as described above. As compared to the alternatives discussed in the Draft EIS, the Airport Alternative will carry the most passengers, provide the greatest transit-user benefits, and result in the fewest vehicle hours of delay. It will provide access to employment centers at Pearl Harbor Naval Base and Honolulu International Airport and will serve the Salt Lake neighborhood with connecting bus service. Of the three Build Alternatives addressed in the Draft EIS, the Airport Alternative will have slightly less impacts to the natural and built environment analyzed in the Draft EIS. During the public comment period on the Draft EIS, the public overwhelmingly supported the Airport Alternative. Of the comments that specifically supported one of the alternatives, more than 75 percent were in support of the Airport Alternative. For more information this selection is discussed in Section 2.4 of the Final EIS. Since publication of the

Draft EIS, design has been advanced, further analysis has been completed, and information has been added in response to comments on the Draft EIS and agency coordination. The Final EIS discusses the process that was used to select the Preferred Alternative, how comments were considered in the decision-making process, impacts and mitigation commitments.

The travel demand forecasting model for the Project did have an air passenger component. As shown in Table 3-12 of the Final EIS, there will be about 103,900 daily trips by air passengers in 2030 of which 3,500 (3.4 percent) will use transit (bus and rail). Without the Project, only 1,200 daily trips by air passengers would have used transit to travel to or from the airport (or 1.2 percent).

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Status :	Initial Action Needed
Creation Date :	12/7/2008
Creator Affiliation :	
First Name :	Steven
Last Name :	
Business/Organization :	
Address :	
Alternative Preference :	
Apt./Suite No. :	
City :	
State :	HI
Zip Code :	96814
Email :	kokohead7k@hawaiiantel.net
Telephone :	
Telephone Extension :	
Add to Mailing List :	None
Submission Method :	Website
Other Submission Method :	
Submission Date :	12/07/2008
Submission Content/Notes :	Question: What changes will be made to the Country Express bus route after the rail is operational? I currently take the C Express bus from Ala Moana shopping center to Kapolei transit center and back. One bus takes me all the way (23-24 miles one way). The rail will not take me all the way. If I have to use (transfer) to/from The Bus once or even twice, the total commute time one way would take me longer when you factor in the additional waiting and transferring which I do not have now. I would like a reply. Mahalo.

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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Phone: (808) 768-8305 • Fax: (808) 768-4730 • Internet: www.honolulu.gov

MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-331308

Steven
kokohead7k@hawaiiantel.net

Dear Steven:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall indentify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

Once the fixed guideway system is completed and open for revenue service in 2019, Route C will operate between Makaha and Kapolei serving the East Kapolei and UH West Oahu stations. Existing and future bus routes, including route numbers and frequencies, are presented in Appendix D of the Final EIS.

Travel time by rail, including transfers to bus, will be the same as today or less. Under current conditions, travel times via bus can vary considerably due to traffic congestion and unpredictability. Longer-distance buses (such as Route C) are predicted to take longer in the future due to worsening traffic conditions.

Future travel times with rail will be highly reliable. The rail system will operate in its own right-of-way every three minutes during peak periods and every six minutes during mid-day. Route C currently operates every 30 minutes during peak and mid-day periods. Three bus routes will provide connections between the UH West Oahu Station and the Kapolei Transit

Center, and five bus routes will provide service between the East Kapolei Station and the Kapolei Transit Center. As stated in Section 3.4.2 of the Final EIS, because of the high frequency of the fixed guideway service, riders transferring from buses to the fixed guideway will experience minimal wait times. Riders transferring from rail-to-bus will benefit from coordinated transfers between trains and buses, thereby minimizing wait times.

The FTA and DTS appreciate your interest in the Project. The Final EIS has been issued in conjunction with the distribution of this letter. You may view the Final EIS on the Project website at www.honolulutransit.org. You may request a DVD of the Final EIS and additional content through the "Contact Us" tab on the website or by calling the Project hotline at 566-2299. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Status :	Initial Action Needed
Creation Date :	12/11/2008
Creator Affiliation :	
First Name :	
Last Name :	
Business/Organization :	
Address :	
Alternative Preference :	
Apt./Suite No. :	
City :	
State :	HI
Zip Code :	96797
Email :	
Telephone :	
Telephone Extension :	
Add to Mailing List :	None
Submission Method :	Website
Other Submission Method :	
Submission Date :	12/11/2008
Submission Content/Notes :	I agree with Charles Djou. I would like to see the rail route moved to the airport & the first segment start in Honolulu & move up to either Aloha Stadium or Pearl Ridge. Also, it is critical that you locate the changing station in the most convinient & safest parts of the community or the only people who will be using the rail will be low income & homeless.

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-331800

Anonymous
(No address or e-mail provided)

Dear Anonymous:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall indentify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

Your preference for the Airport Alternative has been noted While each of the alternatives discussed in the Draft EIS includes trade-offs between benefits and impacts, the Airport Alternative from East Kapolei to Ala Moana has been identified as the Preferred Alternative as described above. Compared to the other alternatives discussed in the Draft EIS, the Airport Alternative will carry the most passengers, provide the greatest transit-user benefits, and result in the fewest vehicle hours of delay. It will provide access to employment centers at Pearl Harbor Naval Base and Honolulu International Airport and will serve the Salt Lake neighborhood with connecting bus service. Of the three Build Alternatives addressed in the Draft EIS, the Airport Alternative will have slightly lower impacts to the natural and built environment. During the public comment period on the Draft EIS, the public overwhelmingly supported the Airport Alternative. Of the comments that specifically supported one of the alternatives, more than 75 percent were in support of the Airport Alternative.

As described in Section 2.5.10, Project Phasing, and further in Section 8.6.9, Construction Phasing, in the Final EIS, to support phased opening, the first construction phase must be connected to a maintenance and storage facility, which requires considerable space. No location has been identified closer to Downtown with sufficient available space to construct a maintenance and storage facility. Therefore, construction will begin between East Kapolei and Leeward Community College. The Project will be constructed in phases to accomplish the following:

- *Match the anticipated schedule for right-of-way acquisition and utility relocations.*
- *Reduce the time that each area will experience traffic and community disturbances.*
- *Allow for multiple construction contracts with smaller contract size to promote more competitive bidding.*
- *Match the rate of construction to what can be maintained with local workforce and available financial resources.*
- *Balance expenditure of funds to minimize borrowing.*

The portion of the corridor in the Ewa direction of Pearl Highlands is less developed than the areas in the Koko Head direction. Right-of-way can be obtained more quickly at the west end of the Project; therefore, overall project construction can begin earlier, resulting in lower total construction costs. Construction is planned to continue uninterrupted in the Koko Head direction from Pearl Highlands to Aloha Stadium, Kalihi, and finally to Ala Moana Center.

As portions of the Project are completed, each will be opened incrementally so that system benefits, even if limited during the initial phases, will be realized prior to completion of construction of the entire Project..

As discussed in the Final EIS Section 2.5.4 Safety and Security Measures, a project-specific Safety and Security Management Plan has been developed in accordance with FTA requirements to define the safety and security activities and methods for identifying, evaluating, and resolving potential safety hazards and security vulnerabilities of the system. It establishes responsibility and accountability for safety and security during the Preliminary Engineering, Final Design, construction, testing, and start-up phases of the Project. The Honolulu Police Department, the Honolulu Fire Department, the Honolulu Department of Emergency Management, and the Honolulu Emergency Services Department have been involved in preparing and will be part of implementing the plan. The plan addresses public safety and security concerns, including threats and hazards associated with the Project, specific issues that were identified through community outreach efforts, and design and architectural details to enhance safety.

The FTA and DTS appreciate your interest in the Project. The Final EIS has been issued in conjunction with the distribution of this letter. You may view the Final EIS on the Project website at www.honolulutransit.org. You may request a DVD of the Final EIS and additional

content through the "Contact Us" tab on the website or by calling the Project hotline at 566-2299. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Status :	Initial Action Needed
Creation Date :	12/12/2008
Creator Affiliation :	
First Name :	Daren
Last Name :	D
Business/Organization :	
Address :	
Alternative Preference :	
Apt./Suite No. :	
City :	
State :	WA
Zip Code :	00000
Email :	cooldster@hotmail.com
Telephone :	
Telephone Extension :	
Add to Mailing List :	None
Submission Method :	Website
Other Submission Method :	
Submission Date :	12/12/2008
Submission Content/Notes :	Hawaii has a very strong natural tropical and green environment. Why would you opt for conventional trains elevated when a monorail is the most suitable technology for such beautiful setting? Just take a look at Okinawa's monorail.

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/090-331947

Mr. Daren D.
cooldster@hotmail.com

Dear Mr. Daren D.:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall indentify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

In parallel with the alignment analysis, as stated in Section 2.2.3 of this Final EIS, the NEPA Notice of Intent requested input on five transit technologies. A technical review process included the opportunity for public comment and was used in parallel with the alternatives analysis to select a transit technology. The process included a broad request for information that was publicized to the transit industry. Transit vehicle manufacturers submitted 12 responses covering all of the technologies listed in the Notice of Intent. An independent five-member technology panel composed of four transit experts and a transportation academic appointed by the City Council evaluated guided rubber-tire-on-concrete systems (e.g., Phileas bus system and VAL-type systems), monorail (which is a variation on rubber-tyred technology), steel-wheel-on-steel-rail systems, (e.g., light rail and rapid rail), and magnetic levitation (MAGLEV) . The panel considered the performance, cost, and reliability of the proposed technologies.

Proprietary technologies, meaning those technologies that would have required all future purchases of vehicles or equipment to be from a single manufacturer, were eliminated because none of the proprietary technologies offered substantial proven performance, cost, and reliability benefits compared to steel wheel operating on steel rail.

The panel accepted public comment twice as part of its review. By a four-to-one vote, the panel chose a steel wheel vehicle operating on steel rail system because it was considered safe, reliable, economical, and non-proprietary. Those results are documented in the panel's report to the City Council dated February 22, 2008 entitled "Independent Technology Selection Panel Report".

The assessment of visual effect due to the Project as described in Section 4.8.3 of the Final EIS considers changes to the visual landscape and viewer responses to those changes. This includes the existing development along the Project alignment. Within the Project corridor the environment changes from rural at the Wai'anae end of the corridor to dense high-rise development at the Koko Head end.

As part of the design process, the City has developed design principles, which are identified in the Honolulu High-Capacity Transit Corridor Project Compendium of Design Criteria (RTD 2009m) that will be implemented in final design to minimize visual effects of the Project. For example, guideway materials and surface textures will be selected in accordance with generally accepted architectural principles to achieve effective integration between the guideway and its surrounding environment. Landscape and streetscape improvements will mitigate potential visual impacts, primarily for street-level views.

Other measures to address visual impacts of the Project are being developed through the station design and planning process. The initial station area plans and design guidelines were first developed with coordination between DTS and the Department of Planning and Permitting (DPP). The next level of transit station design focuses on integrating individual neighborhood characteristics of the communities served by the stations.

The following mitigation framework will be included in the Project to minimize negative visual effects and enhance the visual and aesthetic opportunities that it creates:

- *Develop and apply design guidelines that will establish a consistent design framework for the Project with consideration of local context.*
- *Coordinate the project design with City TOD planning and DPP.*
- *Consult with the communities surrounding each station for input on station design elements.*
- *Consider specific sites for landscaping and trees during the final design phase when plans for new plantings will be prepared by a landscape architect. Landscape and streetscape improvements will serve to mitigate potential visual impacts.*

Section 4.8.3 of the Final EIS, Design Principles and Mitigation includes information related to the mitigation framework described above. Specifically architecture and landscape design criteria include guidelines regarding site design, materials and finishes, and lighting, which apply to stations, station areas, and the guideway.

The FTA and DTS appreciate your interest in the Project. The Final EIS has been issued in conjunction with the distribution of this letter. You may view the Final EIS on the Project website at www.honolulutransit.org. You may request a DVD of the Final EIS and additional content through the "Contact Us" tab on the website or by calling the Project hotline at 566-2299. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Status :	Initial Action Needed
Creation Date :	1/2/2009
Creator Affiliation :	
First Name :	
Last Name :	
Business/Organization :	
Address :	
Alternative Preference :	
Apt./Suite No. :	
City :	
State :	HI
Zip Code :	96816
Email :	jhm245@yahoo.com
Telephone :	
Telephone Extension :	
Add to Mailing List :	None
Submission Method :	Website
Other Submission Method :	
Submission Date :	01/02/2009

Submission Content/Notes : For the rail system to actually achieve its stated purpose of alleviating traffic from the West side, the main line MUST include in its initial build stops at Oahu's 2 major employers (Pearl Harbor & Waikiki) and 2 major destinations (Airport & Ala Moana Center). However, the current plan only includes Ala Moana Center. So you're not actually moving the people to where they actually want to go. And you're not actually going to take that many cars off the road.

The same thing goes for the continuing argument that UH Manoa needs to be connected by rail. First, you'd take more cars off the road at much less expense by actually building UH West, which has been waiting for a permanent campus since the 1970s.
Secondly, by 2030, we will no longer actually need to move people to the universities. We'll be able to move the universities into people's living rooms. In fact, UH already has a instructional telecommunication network linking students at other campuses to UH Manoa.

Likewise, closing the State government's Millitani telecommuting center -- instead of opening new ones in other communities -- was equally short-sighted and backward-thinking. Some people actually need to show up at work -- (like Pearl Harbor and Waikiki). But work that CAN be done offsite SHOULD be done offsite. THAT would take more cars off the road than any train would. But, again, the government is still trying to move people to their jobs instead of moving their jobs to the people.

We're already living in the Information Age. So why does it seem like our planning is still being done by cavemen?

I don't have a problem with building a rail system. While it's not a perfect or complete solution, I still think it's a good start. I just have a problem with being stupid about it.

The "Locally Preferred Alternative" (the Salt Lake route), which doesn't include Pearl Harbor, the airport and Waikiki, will not achieve your stated goal of reducing traffic from the West side. Which begs the question, just which "locals" actually "preferred" this alternative? And what is your TRUE objective here?

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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Phone: (808) 768-8305 • Fax: (808) 768-4730 • Internet: www.honolulu.gov

MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-332344

Concerned Citizen
jhm245@yahoo.com

Dear Concerned Citizen:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

The fixed guideway system extends from East Kapolei to Ala Moana Center and points in-between. The travel demand forecasting model for the Project did have an air passenger component. As shown in Table 3-12 of the Final EIS, there will be about 103,900 daily trips by air passengers in 2030 of which 3,500 (3.4 percent) will use transit (bus and rail). Without the Project, only 1,200 daily trips by air passengers would have used transit to travel to or from the airport (or 1.2 percent).

While each of the alternatives discussed in the Draft EIS includes trade-offs between benefits and impacts, the Airport Alternative from East Kapolei to Ala Moana has been selected as the Preferred Alternative as described above. As compared to the alternatives discussed in the Draft EIS, the Airport Alternative will carry the most passengers, provide the greatest transit-user benefits, and result in the fewest vehicle hours of delay. It will provide access to employment centers at Pearl Harbor Naval Base and Honolulu International Airport and will serve the Salt Lake neighborhood with connecting bus service. Of the three Build Alternatives

addressed in the Draft EIS, the Airport Alternative will have slightly less impacts to the natural and built environment analyzed in the Draft EIS. During the public comment period on the Draft EIS, the public overwhelmingly supported the Airport Alternative. Of the comments that specifically supported one of the alternatives, more than 75 percent were in support of the Airport Alternative. For more information this selection is discussed in Section 2.4 of the Final EIS. Since publication of the Draft EIS, design has been advanced, further analysis has been completed, and information has been added in response to comments on the Draft EIS and agency coordination. The Final EIS discusses the process that was used to select the Preferred Alternative, how comments were considered in the decision-making process, impacts and mitigation commitments.

The Project has logical termini at East Kapolei and Ala Moana Center and independent utility from any extensions that may be constructed in the future. The future extensions to West Kapolei, Salt Lake Boulevard, Waikiki, and UH Manoa are discussed in the cumulative impacts sections of Chapters 3 and 4 of the Final EIS; however the future extensions are not part of this Project, thus they are not required to be evaluated under Chapter 343 of the Hawaii Revised Statutes and NEPA. Under NEPA, environmental analysis is only required when there is a proposed action by a Federal agency. Here, because the future extensions are not proposed for implementation at this time, they are not part of the Project studied in the Final EIS. It would be premature to undertake an environmental analysis of the extensions (beyond the cumulative impacts analysis) because they are not part of the proposed action to be taken by the City and FTA. If the future extensions are proposed for implementation in the future, environmental analysis of the extensions and appropriate alternatives will be undertaken at that time. Connection to UH Manoa and Waikiki will be served by buses integrated with the system. The Draft EIS reflects this operation.

Chapter 3 of the Final EIS includes system ridership numbers in Table 3-12. In 2030, over 55,000 more person trips will be made on transit per day with the Project compared to the No Build Alternative. This will result in a daily reduction in vehicle trips of 51,200 and in vehicle miles traveled of 574,100 miles on the Island of Oahu. The Project is being constructed in coordination with UH West Oahu. A substantial portion of trips to the campus will be completed on rail. As shown in Figure 3-11, the transit mode share of trips from Ala Moana Center to UH West Oahu increases significantly with the addition of the Project compared to No Build conditions.

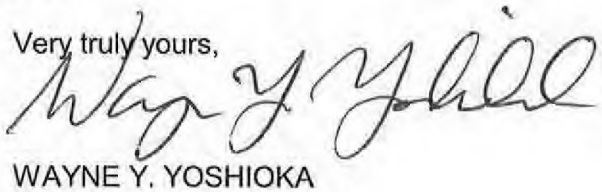
One clarification is appropriate. While the Airport, Pearl Harbor, and Ala Moana Center are major employment centers, the Project, as currently being designed, does serve Downtown Honolulu, which is one of the largest employment centers on Oahu. It also makes provisions for growth planned in the Kapolei area as a future major employment core, which will allow for the establishment of a transit-based commuting pattern as the area evolves rather than after commuters have adopted the car for such trips, as has been the case elsewhere.

The comments regarding travel in the "Information Age" are beyond the scope of the Draft and Final EISs. One general note, however, is that telecommuting has its applications in some industries and in some cities but has not been effective at reducing to any substantial degree the aggregate trip-making in a region. An emphasis on telecommuting is not a government decision but mostly a private-sector work choice that is made available by

employers and agreed to between employers and employees. Until such changes are adopted by a larger segment of the workforce, physical travel solutions are still needed to address travel demand. Any emphasis on telecommuting that provides access to education, work, or other activities should be encouraged as part of an overall travel-reduction strategy. However, while information technology has enabled people to remain connected from any location, it has not eliminated the need or desire of people to travel on the island. Agencies and businesses may allow their workers to work from home, which can assist in reducing congestion; however, there will continue to be a need to travel, and the Project will provide an additional travel option.

The FTA and DTS appreciate your interest in the Project. The Final EIS has been issued in conjunction with the distribution of this letter. You may view the Final EIS on the Project website at www.honolulutransit.org. You may request a DVD of the Final EIS and additional content through the "Contact Us" tab on the website or by calling the Project hotline at 566-2299. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,



WAYNE Y. YOSHIOKA
Director

Status :	Initial Action Needed
Creation Date :	2/6/2009
Creator Affiliation :	
First Name :	
Last Name :	
Business/Organization :	
Address :	
Alternative Preference :	
Apt./Suite No. :	
City :	
State :	HI
Zip Code :	96744
Email :	
Telephone :	
Telephone Extension :	
Add to Mailing List :	None
Submission Method :	Website
Other Submission Method :	
Submission Date :	02/06/2009
Submission Content/Notes :	We can't afford rail at this time. I am totally opposed to it.

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-334600

Anonymous
(No address or e-mail provided)

Dear Anonymous:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraph addresses your comments regarding the above-referenced submittal:

Your opposition to the Project has been noted. The financial plan developed for the Project and summarized in Chapter 6 of the Final EIS indicates how the Project will be funded.

The FTA and DTS appreciate your interest in the Project. The Final EIS has been issued in conjunction with the distribution of this letter. You may view the Final EIS on the Project website at www.honolulutransit.org. You may request a DVD of the Final EIS and additional content through the "Contact Us" tab on the website or by calling the Project hotline at 566-2299. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Status :	Initial Action Needed
Creation Date :	2/6/2009
Creator Affiliation :	
First Name :	J
Last Name :	C
Business/Organization :	Bruce
Address :	46090 Konohiki St
Alternative Preference :	
Apt./Suite No. :	
City :	Kaneohe
State :	HI
Zip Code :	96744
Email :	mizoleila@hotmail.com
Telephone :	
Telephone Extension :	
Add to Mailing List :	Both
Submission Method :	Website
Other Submission Method :	
Submission Date :	02/06/2009
Submission Content/Notes :	Elevated steel on steel is a bad choice. It will be an eyesore. It's too expensive. Please, wait a decade and see what the world is like; then we'll see about rail.

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MUFI HANNEMANN
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WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-334601

J. C.
46-090 Konohiki Street
Kaneohe, Hawaii 96744

Dear J. C.:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

Your position is noted, but waiting ten years does not address the Project's needs or meet the purpose of the Project, as discussed in Sections 1.7 and 1.8 of the Final EIS. While each of the alternatives includes trade-offs between benefits and impacts, the Airport Alternative from East Kapolei to Ala Moana has been selected as the Preferred Alternative. The identification of the Airport Alternative as the Preferred Alternative was made by the City to comply with the FTA's NEPA regulations that state the Final EIS should identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection is detailed in Section 2.4 of the Final EIS and was based on consideration of the benefits of each alternative, public input on the Draft EIS, and City Council Resolution 08-261 identifying the Airport Alternative as the Project. Further, FTA's NEPA regulations for projects proposed to be funded with major capital investment funds, the level of detail necessarily increases between the Draft EIS and the Final EIS through preliminary engineering work (23 CFR 771.123 (j)).

As noted in Chapter 2 of the Final EIS, in parallel with the alignment analysis, a five-member panel appointed by the City Council and the Mayor considered the performance, cost, and reliability of the five proposed technologies for the fixed guideway system. The panel twice accepted public comment as part of this review. By a four-to-one vote, the panel selected steel wheel operating on steel rail as the technology for the Project evaluated in the Final EIS. The four panel members selected steel-wheel technology because it is mature, proven, safe, reliable, economical, and non-proprietary. Proprietary technologies, meaning those technologies that would have required all future purchases of vehicles or equipment to be from a single manufacturer, were eliminated because none of the proprietary technologies offered substantial proven performance, cost, and reliability benefits compared to steel wheel operating on steel rail. Selecting a proprietary technology also would have precluded a competitive bidding process, likely resulting in increased overall project costs.

The assessment of visual effect due to the Project as described in Section 4.8.3 of the Final EIS considers changes to the visual landscape and viewer responses to those changes. This includes the existing development along the Project alignment. Within the Project corridor the environment changes from rural at the Wai'anae end of the corridor to dense high-rise development at the Koko Head end.

As part of the design process, the City has developed design principles, which are identified in the Honolulu High-Capacity Transit Corridor Project Compendium of Design Criteria (RTD 2009m) that will be implemented in final design to minimize visual effects of the Project. For example, guideway materials and surface textures will be selected in accordance with generally accepted architectural principles to achieve effective integration between the guideway and its surrounding environment. Landscape and streetscape improvements will mitigate potential visual impacts, primarily for street-level views.

Other measures to address visual impacts of the Project are being developed through the station design and planning process. The initial station area plans and design guidelines were first developed with coordination between DTS and the Department of Planning and Permitting (DPP). The next level of transit station design focuses on integrating individual neighborhood characteristics of the communities served by the stations.

The following mitigation framework will be included in the Project to minimize negative visual effects and enhance the visual and aesthetic opportunities that it creates:

- *Develop and apply design guidelines that will establish a consistent design framework for the Project with consideration of local context.*
- *Coordinate the project design with City TOD planning and DPP.*
- *Consult with the communities surrounding each station for input on station design elements.*
- *Consider specific sites for landscaping and trees during the final design phase when plans for new plantings will be prepared by a landscape architect. Landscape and streetscape improvements will serve to mitigate potential visual impacts.*

Section 4.8.3 of the Final EIS, Design Principles and Mitigation includes information related to the mitigation framework described above. Specifically architecture and landscape design

criteria include guidelines regarding site design, materials and finishes, and lighting, which apply to stations, station areas, and the guideway.

Lastly, Chapter 6 of the Final EIS describes the financial resources anticipated to be needed to pay for the capital costs of the Project and for ongoing operating and maintenance costs. Capital costs, including finance charges, are expected to be fully paid for by a combination of funds from the Federal government and the General Excise and Use Tax surcharge revenues collected from 2007 through 2022 on Oahu. Operating and maintenance costs will be paid for from the same sources currently used for TheBus: Federal funding, fare revenues, and City revenues from the General and Highway Funds. These funding assumptions are subject to a number of risks and uncertainties, as described in Section 6.6.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

These are just a list of some concerns over the City & County of Honolulu's proposed Light Rail Transit system. Many of these have been mentioned in various discussions, but none of the answers have been adequately answered by the City Transportation Director, Mayor, nor the Council.

1. Building costs are understated, future increases in construction, labor, and material costs are not reported nor mentioned. Also, some of the City's plans for the terminals/terminus are incomplete, missing substructures, rails, handi-access, etc. Was this to artificially deflate the reportable costs? If so the City's entire plan is flawed, and fraudulent.
2. No mention is made of a turn-around or depot. There will undoubtedly be a maintenance yard or some related facility to take the tram down for repairs. This is not mentioned.
3. The Administration has made repeated assurances that the project will be done with minimal impact to neighboring areas, residents, businesses. This cannot be the case. Building and construction guidelines are very specific, requiring x amount of relief space, and will require shutdown of adjoining lots, properties, streets and roads.
4. Many of the people who realized their properties will be (eventually) condemned via eminent domain are under the absolutely mistaken impression that they will be receiving the (at future time) full market value (fmv) of their properties. This is not the case. Research into the City's sojourns into exercising eminent domain muscle reveals that they set aside a lump sum amount, to be paid to defendants served with the Order Putting Plaintiff in Possession (i.e. City). Wording is usually like this: "The sum of $xx,xxx deposited with the Chief Clerk of this Court by the Plaintiff as estimated just compensation..." Usually the award is a few pennies on the dollar of the actual value of the condemed and claimed property. The defendant usually has no recourse. Waianae residents were notified last July that they were losing portions of their property, after construction had already begun for the emergency access road.
5. Regarding property, it is likely the rail system will negatively affect property values. Cities have trended that property values drop near an existing commuter or rail line. The noise negates, for most people, the benefit of proximity to a transit line. Many cities found that rail ridership decreased, in favor of buses, bicycles, and scooters.
6. I personally believe most people would favor a scooter over inconvenience of driving to a depot yard and park their car with thousands of others, to catch a rail to work.
7. The lifespan of a typical rail system is about 30 years. Thereafter, it must be 100% wholly replaced at full value at that future time. It's simply a matter of infrastructure breakdown.
8. The lifespan of a typical tram system (light rail) is about 15 years. Thereafter, it must be 100% wholly replaced, or else repaired to the point where it's economically unfeasible.
9. The mathematics of the City's plan to take 50,000 drivers off the road is not practical nor possible. Let's assume the City is extremely aggressive and forward-thinking in their planning. Let's say they build two rail systems, one that begins in point A (Kapolei area) and the other begins in point B (Downtown). Let's say there are 12 cars to a train (no longer considered light rail), each holding 200 passengers, which is 2,400 passengers total capacity per train, going a single way, or 4,800 passengers for the entire system. Let's say the trains will cross each other in the middle, so there is always a train going and coming in both directions. In order to meet the Administration's goal to take an approximate 50,000 drivers off the road at that future time, the trains will have to travel about 77 miles per hour, nonstop, in order to make the approximate 10 round trips each train will have to make, in an hours' time. This oversimplified math problem underlies the fatal flaw in the plan. The City's plan for light rail does not have the capacity for 4,800 total passengers at any given time. This would be rush hour in the morning, from 5:30AM to 8:30AM, and 3:30PM to 6:30PM. It is not mathematically possible to do it with the above configuration, nor with the City's proposed version, which is much smaller passenger capacity. This may be decried by the Administration as "Mickey Mouse Math" but the figures cannot be doubted. The rail will not accomplish what it is envisioned to.
10. The City's proposed 6,000+ jobs to directly or indirectly support the rail system, operations, maintenance, support services, administration, and vendor services, is not economically sustainable. The vendors have the best bet, at least people will stop on the way to buy coffee,

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pastries, morning paper, etc. But wait, they can't because the system has to run without stops to make its rush hour quotas.

11. The City's Transportation Department has in effect given their current employees a potential for higher-paying and more executive jobs, "fresh" and new. The current employees are capped where they are at, but the Rapid Transit Division (the most expensive and largest Division by staff and dollars) is a way for them to move up. See their presentation here: http://www.honolulu.gov/dts/dts+fy2008+operating+budget+request.pdf If you scroll down to page 7, you will see "Rapid Transit Division", 35 proposed executive and administrative support positions, costing a whopping $2,338,644 in staff costs, dwarfing their next largest Division by over $500,000, but has only 1 position more. This indicates that, given civil service positions and current pay scales, these are much higher and more executive positions, possibly (POSSIBLY) created this way by the Transportation Department to give their currently celling'd staff someplace to go, and retire happily with a healthy retirement pay.
12. No amount of ridership fees could make up the construction, maintenance, and daily operations costs of the entire rail system. Notwithstanding the payroll costs. The majority of the costs will become personnel-related, such as 41+% fringe rate, immediate salaries plus vacation payouts and other benefits. Throw in maintenance? That's also a personnel cost, with OT attached, at City & County rates. You know, 12 maintenance workers scheduled to perform upkeep, each files OT requests, however only 1 or 2 actually do majority of the work. A recent audit found many road crews operate in this fashion. However the audit was for City internal use only.
13. No amount of taxes can make up the total cost plus ongoing upkeep. The burden on the taxpayers of the state would be astronomical, it could not possibly be estimated.
14. People who voted "YES" did not realize, they were not really indebting themselves, but their progeny, to a lifetime of debt service to this system. It cannot possibly be completed before, say, 2025 or 2030, when most of those who voted will be at or nearing retirement, and it will no longer make a difference for them. Many people simply jumped on the bandwagon without really thinking things through.
15. A raised rail system lumbering many stories above buildings and 1-2 storey homes and apartments in the proposed areas would ruin not just the overall landscape, but many people's enjoyment of the view looking out not to the ocean, but the SKY.
16. The Administration's claim is that if they get this project going now, they can jumpstart the state's economy and provide much-needed jobs through construction. This is short-term a truth, however if there exists no money to begin with, and the Council on Revenue's forecast shows a current year deficit, with factors of debt in the out-years, where is the funding going to come from? It reminds me of a very ambitious building project in Downtown, that sat for many years until another investor came by. Only the Federal Gov't can deficit spend. How can you ambitiously plan alternate and future routes (as the Council is debating now) without having any up-front direct revenues, investor venture capital, bond interest, or other form of monies on hand to even "break ground"?
17. Construction costs are years away, when materials, labor, and rates will be much higher. Final completion costs can be many times the $5 Billion thrown in front of the hapless public. And, once construction begins, final completion can be upwards of 20 years away, including the various legal battles and hurdles the City will no doubt face, in battling hundreds of home and landowners, businesses, and action groups. It will be unprecedented in our State's history, and will likely bring embarassment to us nationally.
18. Speaking of attention, it is likely that people will prefer (as they do now) places such as Tahiti, Fiji, Thailand, and New Zealand, over Oahu anyway. Many tourists surveyed by the HTA recently said they'd never come back if the beaches eroded. What happens if (i.e. by the year 2030) the beach in Waikiki is a memory, hotels are literally flooded, AND there is a lumbering, leviathan, hulking, clackety, metallic silver worm snaking its way through Downtown? Realistically, do you think any tourists would come to Honolulu, except to use it as a springboard from the Mainland USA to their exotic destination in the far Pacific or Asia?
19. Other states that the Administration quoted as having successful rail systems have something that Hawaii will never have, regardless of how much development we want to create - land space. If anything, Hawaii - due to current erosion - can do nothing but lose land space, at least

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in Honolulu County. In order for the rail to be plopped down, people who are already there have to make way. As our proud and defiant mayor has proclaimed in various ways, "...anyone opposing this will have to just get out of the way..." The first time he said it on TV, we passed it off to his frustration and lack of self-control. Thereafter, it is a clear indication of absolute superciliousness, self-love, and hubris which I do not ever recall seeing in any of our recent mayors of my memory. The sign of a bad publican is to - even modestly - threaten to shove it down the peoples' collective throats when his way is challenged, and his personal progress slowed.

20. The Administration does not inform the public of the following: Chicago Mass Transit (Chicago Transit Authority), one of the original models for an earlier proposed transit system, is bankrupt. If not yet, pretty darn near. The cost of doing business has long overrun the intake due to ridership, which has decreased over the last 30 years. Even their bus ridership is down, largely due to increased crime in poverty-stricken areas near the center of town. Unfortunately for us, Pearl City & Mililani are becoming what Kalihi and Liliha have long been - our native slum.
21. Sound is a pressure wave that eminates radially outward from its source, decreasing as the inverse square of that distance the listener is from it. The City's contention that erecting short walls, combined with the raised platform, will decrease noise to a minimal level, is preposterous beyond laughable. Any system, even a rolling wheeled vehicle, creates a significant amount of noise, and particularly at night. Anyone who lives near the University or along the H-1 between McCully through Pearl City knows this. Even if it is no louder than a small grass whip, it will be noticed, and people will be driven out. I used to live in a small apartment on Thurston Avenue in Makiki, and the simple act of the bus rolling at 11 at night was enough to jolt this young child - at that time - awake from a light sleep.
22. A research paper by Randal O'Toole from the Cato Institute, "Does Rail Transit Save Energy or Reduce Greenhouse Gas Emissions?" (http://www.cato.org/pubs/pas/pa-615.pdf) asserts that the following would be more cost-effective and reduce greenhouse emissions than rail transit:
    -Powering buses with hybrid-electric motors, biofuels, and non-fossil sourced electricity
    -Concentrating the major load of bus service to heavy-load routes, and smaller buses for off-peak and lower demand areas
    -Building new toll systems and coordinating traffic signals to relieve highway congestion that contributes to the waste of over 3 billion gallons of fuel annually
    -Encourage people to purchase fuel-efficient cars. Get 1% of commuters to switch to hybrid cars costs less and saves more energy than trying to get 1% to switch to public transit, and most of those keeping their cars. After all, the rail only runs on one side of the island.
23. This same research paper by Mr. O'Toole reveals the average light rail system of those studied, requires over 4,000 BTU and generates almost .7 pounds of CO2 PER PASSENGER MILE. To traverse the estimated 26-30 mile rail stretch, one way per trip (not per day) would require an average of 104,000 - 120,000 BTU in energy and generate 18 - 21 pounds of CO2, more than average of city buses running for one hour.
24. This same research paper asserts that the mere construction, over many years, of the system itself, would generate more CO2 and cost more in energy and fuel consumption, than the rail, and may "never be recovered by the savings (of constructing the rail in the first place).
25. Due to Homeland Security regulations involving public transportation, the City & County would have to establish, and integrate into the Honolulu Police Department, a separate Honolulu Rapid Transit Police force, or else divert current - or future - officers to that duty. Security screens may be necessary at depots as well, adding to delays (but wait, they can't stop right?).
26. The Administration claims that the economy will be stimulated, looking at (i.e.) Denver, Portland, and San Jose light rail development, don't realize that those systems were supported by large tax or other subsidies, something dramatically lacking in Hawaii's economy. Even the current tax collected for transit is far short of proposed levels they would have to be at for the system to be a reality.
27. Finally, no mention is made as to whether this light rail system can accommodate passengers (i.e. from the airport) with large luggage, or whether stowage space is or can be provided for safety, comfort, and security of others?

AR00003632

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010 RT2/09-299021R

Anonymous
(No address or e-mail provided)

Dear Anonymous:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal in the same way as submitted:

1) Chapter 6 of the Final EIS addresses your concern.

2) Chapter 2 of the Final EIS provides details about the maintenance and storage facility, and Section 4.17 of the Final EIS provides details about the environmental effects of the maintenance and storage facility options.

3) Construction activities will occur and be contained within the study corridor as much as possible. The general mitigation measures related to acquisitions, displacements, and relocations are presented in Section 4.4.3 of the Final EIS. For those partial acquisitions, defined in Section 4.4.1 of the Final EIS, "For commercial properties, including situations where the commercial property could lose its function, full acquisition was considered." DTS's right-of-way managers will be working with individual property owners to provide relocation services, "...to all affected business and residential property owners and tenants without discrimination;

persons, businesses, or organizations that are displaced as a result of the Project will be treated fairly and equitably" (Section 4.4.3). Temporary construction easements will be negotiated on a case-by-case basis.

4) As stated previously in response to No. 3, the City's right-of-way staff will work with individual property owners to provide relocation services, "...to all affected business and residential property owners and tenants." Because the City will use Federal funds to finance the Project, it must comply with policies and procedures that conform to the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, and 49 CFR Part 24 implementing regulations (collectively "the Uniform Act"), as well as FTA Circular 5010.1 C and applicable implementation guidelines. 49 CFR Section 24.102 (d) states the amount of just compensation "shall not be less than the approved appraisal of the market value of the property..."

5) The Project will include an integrated noise-blocking parapet wall at the edge of the guideway structure that extends three feet above the top of the rail. The parapet wall will substantially reduce ground-level noise. With the recommended mitigation in place (sound absorbing material and wheel skirts), the noise analysis indicates that the new noise generated by the Project will be lower than the existing noise levels in most places. Wheel skirts will increase the benefit from the parapet wall at locations above the elevation of the track. The use of sound-absorptive materials below the tracks in the areas that will experience moderate noise impacts will reduce the Project noise levels from the upper floors to below the impact level. Once the Project is operating, noise levels will be re-measured to confirm that there are no noise impacts from the Project. Section 4.3 of the Final EIS did not include an evaluation of the direct impact of the Project on property values, as those values are subject to economic forces outside the direct control of the Project. Section 4.19.2 of the Final EIS did consider changes in property values as an indirect effect. This section states that "changes in property values that will result from construction of the transit system will have an indirect effect. Research based on New York and other cities has shown that residential property values can increase close to a transit station (Table 4-38)." Section 4.19.2 also acknowledges the potential for nuisance effects on property values, but notes that these negative effects are offset by the positive effect of decreased travel times and the desirability of properties near transit stations.

6) Use of a scooter is a matter of choice to individuals.

7) The design lifetime of the Project is 50 years. After that period, substantial renewal of the system is anticipated.

8) The design lifetime of the Project is 50 years.

9) As stated in Chapter 3 of the Final EIS, peak direction volume during the a.m. two-hour peak period will be below the fixed guideway system's currently planned minimum capacity. Should higher volumes be realized, the system is expandable to accommodate longer trains and to reduce the headways between trains from 3 minutes to 90 seconds, thereby increasing capacity by 100 percent. As also discussed in Section 3.4.2 of the Final EIS, the model predicted the maximum peak direction volume during the a.m. two-hour peak period will be about 14,700 passengers. The operating plan for the fixed guideway system has been

revised, and the system will have a minimum capacity exceeding 17,300 passengers per direction during the two-hour peak period. Table 3-12 in the Final EIS also identifies the estimated reduction in automobile trips resulting from implementation of the fixed guideway system. However, this reduction in automobile trips will occur over the span of one day and not just during the peak hour.

10) The employment numbers quoted by the commenter are for the construction period. The Final EIS did not present estimates for labor for the operation of the transit system. Not all of the induced labor during operation will be employees of the transit agency.

11) Staffing is defined around the needs of the division, and salaries are appropriate compared to similar transit operations in other cities.

12) The City's fare policy is to recover between 27 and 33 percent of operating costs from fares. Assuming continuation of that policy, the City will raise fares to maintain the required percentage of costs. The other 70 percent or so of the costs is the subsidy of the transit system and will be handled during the City's annual budgeting process. Operating and maintenance costs will be paid for from the same sources currently used for TheBus: Federal funding, fare revenues, and City subsidy from the General and Highway Funds.

13) The Financial Plan is balanced using currently identified sources, including the General Excise and Use (GET) surcharge, Federal funding for capital costs, farebox revenue, and other sources of revenue that support the City's operating budget for operating expenses.

14) The funding sources for the construction and operation of the transit facility are presented in Section 6.3.2 of the Final EIS; this includes City General Obligation (GO) Bonds. As presented in Section 6.5.1, "All GO debt is assumed to mature in FY2023..." The completion date for construction work is 2018.

15) Shadowing and views of the sky may only be affected for those low-lying buildings immediately adjacent to the elevated guideway; however, this is partially mitigated by placing the elevated guideway within roadway right-of-way such that skyward views by vehicle occupants are the only viewers typically affected. Refer to Figure 4-21 of the Final EIS.

16) The Financial Plan is balanced and includes capital and operating costs. Moreover, the Plan has been adjusted for lower GET surcharge collection consistent with Council on Revenue's forecasts. The Project will generate 7,500 jobs per year during construction, which will have a positive impact on the economy.

17) As presented in Section 6.2.1 of the Final EIS, "Estimated costs for each standard cost category were increased in accordance with FTA guidance for estimates developed prior to Preliminary Engineering to account for unknown but expected additional expenses."

18) Section 4.3 of the Final EIS indicates that tourism will continue to be the largest industry and job generator on Oahu. The fixed guideway will offer an alternative not currently available for those who travel within the highly developed and congested Honolulu corridor. The corridor itself is now the site of major residential and employment activity, as noted in Section 4.2

of the Final EIS. The Project will not affect beach erosion rates because it is located away from the shoreline.

19) Limited available right-of-way is a major factor in the decision to construct an elevated system within existing street rights-of-way wherever possible.

20) The financial health of the Chicago transit system is not related to the Project.

21) As presented in Section 4.10.1 of the Final EIS, "Noise impacts from transit projects are evaluated using criteria established by the FTA, which are based on community reaction to environmental noise exposure."

22) The paper cited is not project-specific. The statements are general and are not applicable to this Project.

23) As stated in Section 4.9.3 of the Final EIS, the Project will result in a reduction of 171 metric tons of carbon monoxide daily from transportation, including the energy generation to power the rail.

24) While the Draft EIS does not analyze the energy payback period for energy consumed during construction of the transit system, the commenter does acknowledge that there is an energy payback period for transit. The same cannot be said for highway construction that would be needed to accommodate the growth in vehicle miles traveled on Oahu.

25) As discussed in Section 2.5.4 of the Final EIS, all stations, park-and-ride facilities, and vehicles will include security cameras that are monitored at all times of operation, will have audible and visual messaging systems, and an intercom link to the system's operations center. Security personnel will also patrol the system; however, security personnel may not be physically located at all stations and on all trains at all times. Transit security will be provided by the Honolulu Police Department.

26) The capital plan for the Project is presented in Section 6.3 of the Final EIS, including a description of the amount of funding anticipated from various sources. Section 6.6 of the Final EIS describes risks and uncertainties associated with these funding assumptions. In this section, the amount to be generated from the two primary sources of funding from the GET surcharge and the FTA New Starts funds is detailed. The financial plan is balanced, and it will continue to be updated over time as local and national economic conditions change. The updated capital plan presented in Section 6.3 of the Final EIS takes the current economic downturn into account.

27) Rail vehicles will be designed to accommodate luggage that does not interfere with the safety or comfort of other passengers and will be regulated according to a policy to be developed.

The FTA and DTS appreciate your interest in the Project. The Final EIS has been issued in conjunction with the distribution of this letter. You may view the Final EIS on the Project website at www.honolulutransit.org. You may request a DVD of the Final EIS and additional

content through the "Contact Us" tab on the website or by calling the Project hotline at 566-2299. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Status :	Initial Action Needed
Creation Date :	12/9/2008
Creator Affiliation :	
First Name :	
Last Name :	
Business/Organization :	
Address :	
Alternative Preference :	
Apt./Suite No. :	
City :	
State :	HI
Zip Code :	96813
Email :	
Telephone :	
Telephone Extension :	
Add to Mailing List :	None
Submission Method :	Website
Other Submission Method :	
Submission Date :	12/09/2008
Submission Content/Notes :	I have no been a fan of Charles Djou, but I agree with him that construction on the rail project should begin in town. It is folly for us to begin it in West Oahu. Based on letters that have been published in the newspapers as well, there doesn't seem to be much disagreement on this issue. I can understand that construction will cause a lot more headaches in town than it will in West Oahu, but it is just common sense to start the construction in town. The rail will not be needed in West Oahu if it never gets to town and rail will definitely be a waste of taxpayer's money then!

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-331523

Anonymous
(No address or e-mail provided)

Dear Anonymous:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall indentify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraph addresses your comments regarding the above-referenced submittal:

As described in Section 2.5.10, Project Phasing, and further in Section 8.6.9, Construction Phasing, in the Final EIS, to support phased opening, the first construction phase must be connected to a maintenance and storage facility, which requires considerable space. No location has been identified closer to Downtown with sufficient available space to construct a maintenance and storage facility. Therefore, construction will begin between East Kapolei and Leeward Community College. The Project will be constructed in phases to accomplish the following:

- *Match the anticipated schedule for right-of-way acquisition and utility relocations.*
- *Reduce the time that each area will experience traffic and community disturbances.*

- *Allow for multiple construction contracts with smaller contract size to promote more competitive bidding.*

- *Match the rate of construction to what can be maintained with local workforce and available financial resources.*

- *Balance expenditure of funds to minimize borrowing.*

The portion of the corridor in the Ewa direction of Pearl Highlands is less developed than the areas in the Koko Head direction. Right-of-way can be obtained more quickly at the west end of the Project; therefore, overall project construction can begin earlier, resulting in lower total construction costs. Construction is planned to continue uninterrupted in the Koko Head direction from Pearl Highlands to Aloha Stadium, Kalihi, and finally to Ala Moana Center.

As portions of the Project are completed, each will be opened incrementally so that system benefits, even if limited during the initial phases, will be realized prior to completion of construction of the entire Project.

The FTA and DTS appreciate your interest in the Project. The Final EIS has been issued in conjunction with the distribution of this letter. You may view the Final EIS on the Project website at www.honolulutransit.org. You may request a DVD of the Final EIS and additional content through the "Contact Us" tab on the website or by calling the Project hotline at 566-2299. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

February 3, 2009

Mr. Ted Matley
FTA Region IX
201 Mission St., Ste. 1650
San Francisco, CA 94105

Mr. Wayne Yoshioka
Department of Transportation Services
City and County of Honolulu
650 So. King St., 3rd Floor
Honolulu, HI 96813

Subject: Honolulu High Capacity Transit Corridor Project
City and County of Honolulu
Draft Environmental Impact Statement/4(f) Evaluation
November 2008

Dear Messrs. Matley and Yoshioka:

As long time residents of the Ala Moana-Sheridan neighborhood, we read with interest the Draft EIS for Honolulu's High Capacity Transit project dated November 2008.

We participated in the City and County of Honolulu's preparation of the draft Sheridan community plan in 2006, and appreciated how the vision is consistent with the City and County of Honolulu's Primary Urban Center Development Plan's designation of the Sheridan and Kaheka neighborhoods as In-Town Residential Neighborhoods. In Ala Moana-Sheridan, over 20% of the population is over 65 years old, and the proportion of elderly is steadily increasing (Draft Ala Moana-Sheridan Community Plan, 2006)." In light of this fact, the 2006 draft Plan discusses how public roads and facilities in and around our neighborhood need to be more pedestrian friendly to the elderly, general pedestrians and bicyclists. Therefore, we reviewed the Transit DEIS for a description and analysis of how access to the Transit Corridor Project would be pedestrian friendly for the Ala-Moana-Sheridan neighborhoods.

Instead, we found the Transit Corridor Project DEIS to be heading in the opposite direction making the area more congested with traffic and in turn creating a more rushed environment. The DEIS directly comments that the proposed TOD in the area will change the feel of the area, presumably making it more urban, "Because Kaka`ako has been designated a redevelopment area, changes in land uses to TOD is likely, which may result in a change in character along the alignment, especially near stations...(DEIS, p. 4-45). While we understand change is inevitable, the Transit DEIS does not even discuss basic project features such as access to the Ala Moana transit station for the affected neighborhood. Since safe and secure pedestrian access to and from the Ala Moana transit station is not discussed or analyzed in the Transit DEIS, we assume no design studies or even serious consideration has been devoted to this, the City and County of Honolulu's major public infrastructure project.

Please revise and expand the Transit DEIS to include detailed descriptions and analyses of the range of pedestrian and bicycle access ways to and from the Ala Moana station. If no consideration has yet been devoted to this project element for the Ala Moana-Sheridan community, we submit the DEIS is deficient and is not yet a complete Draft EIS.

Sincerely, Doris Nakamura

Doris Nakamura, 650 Sheridan Street PH, Honolulu, HI 96814

Y. Murata, 1224 KAMAILE ST. 96814 (address)

_____, _____(address) 705 Piikoi St 96814

_____, _____(address) 740 Sheridan St 96814

_____ _____(address) 650 Sheridan #107 96814

cc: Councilmember Duke Bainum, District 5
Senator Carol Fukunaga, District 11
Representative Tom Brower, District 23
Congressmember Neil Abercrombie
Rep. Karl Rhoads, District 28

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT2/09-299053R

Resident
705 Piikoi Street
Honolulu, Hawaii 96814

Dear Resident:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

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Many pedestrians currently use the network of sidewalks in the Ala Moana-Sheridan neighborhood. The pedestrian volume in the neighborhood will continue to grow with or without the Project. Those walking to the station from surrounding areas will use the existing network of sidewalks. As stated in Section 2.5.5 of the Final EIS, design criteria developed for stations place highest emphasis on walk and bicycle access. Pedestrian access to stations, including accessible routes, shall be given first priority for reasons of safety.

It is estimated that most passengers using this station will transfer to or from buses directly on Kona Street. Those walking to the station from surrounding areas will use the existing network of sidewalks. Bicyclists will access the station via existing streets and/or sidewalks in the area. The station will be designed to accommodate the expected volume of pedestrians and will provide parking for bicycles.

As indicated in Section 4.6.3 of the Final EIS, ongoing coordination efforts with the public will help develop design measures to enhance the interface between the transit system and the surrounding community. The extent, nature, and location of these design measures will be determined in Final Design through these coordination efforts.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

February 3, 2009

Mr. Ted Matley
FTA Region IX
201 Mission St., Ste. 1650
San Francisco, CA 94105

Mr. Wayne Yoshioka
Department of Transportation Services
City and County of Honolulu
650 So. King St., 3rd Floor
Honolulu, HI 96813

Subject: Honolulu High Capacity Transit Corridor Project
City and County of Honolulu
Draft Environmental Impact Statement/4(f) Evaluation
November 2008

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Sincerely, Doris Nakamura

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Y. Murata, 624 (address) KAMAILE ST. 96814

_____, _____(address) 705 Pikoi St 96814

_____, _____(address) 740 Sheridan St 96814

Ethel Nakao _____(address) 650 Sheridan #107 96814

cc: Councilmember Duke Bainum, District 5
Senator Carol Fukunaga, District 11
Representative Tom Brower, District 23
Congressmember Neil Abercrombie
Rep. Karl Rhoads, District 28

AR00003646

DEPARTMENT OF TRANSPORTATION SERVICES

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT2/09-299053R

Resident
740 Sheridan Street
Honolulu, Hawaii 96814

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Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

February 3, 2009

Mr. Ted Matley
FTA Region IX
201 Mission St., Ste. 1650
San Francisco, CA 94105

Mr. Wayne Yoshioka
Department of Transportation Services
City and County of Honolulu
650 So. King St., 3rd Floor
Honolulu, HI 96813

Subject: Honolulu High Capacity Transit Corridor Project
City and County of Honolulu
Draft Environmental Impact Statement/4(f) Evaluation
November 2008

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Sincerely, Doris Nakamura

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_____, (address) 795 Piikoi St 96814

_____, (address) 740 Sheridan ST 96814

_____ (address) 650 Sheridan #107 96814

cc: Councilmember Duke Bainum, District 5
Senator Carol Fukunaga, District 11
Representative Tom Brower, District 23
Congressmember Neil Abercrombie
Rep. Karl Rhoads, District 28

AR00003650

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, 3RD FLOOR
HONOLULU, HAWAII 96813
Phone: (808) 768-8305 • Fax: (808) 768-4730 • Internet: www.honolulu.gov

MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

May 21, 2010

RT2/09-299053R

Resident
650 Sheridan Street, #107
Honolulu, Hawaii 96814

Dear Resident:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address comments regarding the above-referenced submittal:

Many pedestrians currently use the network of sidewalks in the Ala Moana-Sheridan neighborhood. The pedestrian volume in the neighborhood will continue to grow with or without the Project. Those walking to the station from surrounding areas will use the existing network of sidewalks. As stated in Section 2.5.5 of the Final EIS, design criteria developed for stations place highest emphasis on walk and bicycle access. Pedestrian access to stations, including accessible routes, shall be given first priority for reasons of safety.

It is estimated that most passengers using this station will transfer to or from buses directly on Kona Street. Those walking to the station from surrounding areas will use the existing network of sidewalks. Bicyclists will access the station via existing streets and/or sidewalks in the area. The station will be designed to accommodate the expected volume of pedestrians and will provide parking for bicycles.

As indicated in Section 4.6.3 of the Final EIS, ongoing coordination efforts with the public will help develop design measures to enhance the interface between the transit system and the surrounding community. The extent, nature, and location of these design measures will be determined in Final Design through these coordination efforts.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Issuance of the Record of Decision under NEPA and acceptance of the Final EIS by the Governor of the State of Hawaii are the next anticipated actions and will conclude the environmental review process for this Project.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

12/5/08

RECEIVED
2008 DEC -8 P 2:59
CITY COUNCIL
HONOLULU, HAWAII

Dear Councilman Dijon:

I applaud your brave stance by openly ~~stating~~ saying an obvious thing of the rail in town outward make more common sense than the Engineering Co. plan.

As a Waipahu resident its very obvious to us that going from Waipahu to Kapolei does not solve the problem of going to town.

The bus system could move to Kapolei since they use roads. The bus barn ~~and~~ can be used as the train yard for rail cars. The bus barn is in Halawa or wherever it is in Aiea-Pearl city area.

We shouldn't hold our breaths, no common sense decisions are ever made in Hawaii government.* I say it as an retired state worker.

Aloha

Alex

* maybe no common sense decision is ever made by any government?

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-334558

Alex
(No address or e-mail provided)

Dear Alex:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraph addresses your comments regarding the above-referenced submittal:

As described in Section 2.5.10, Project Phasing, and further in Section 8.6.9, Construction Phasing, in the Final EIS, to support phased opening, the first construction phase must be connected to a maintenance and storage facility, which requires considerable space. The first phase of the Project must be connected to the maintenance and storage facility because, in addition to maintenance of equipment and ongoing operations, the maintenance and storage facility houses the main control center for the entire Project, and the required testing and operation of the system could not be completed without access to it. No location has been identified closer to Downtown with sufficient available land to construct a maintenance and storage facility. Therefore, construction will begin between East Kapolei and Leeward Community College. The Project will be constructed in phases to accomplish the following:

- *Match the anticipated schedule for right-of-way acquisition and utility relocations*

- *Reduce the time that each area will experience traffic and community disturbances*
- *Allow for multiple construction contracts with smaller contract size to promote more competitive bidding*
- *Match the rate of construction to what can be maintained with local workforce and available financial resources*
- *Balance expenditure of funds to minimize borrowing*

The portion of the corridor in the Ewa direction of Pearl Highlands is less developed than the areas in the Koko Head direction. Right-of-way can be obtained more quickly at the west end of the Project; therefore, overall project construction can begin earlier, resulting in lower total construction costs. Construction is planned to continue uninterrupted in the Koko Head direction from Pearl Highlands to Aloha Stadium, Kalihi, and finally to Ala Moana Center.

As portions of the Project are completed, each will be opened incrementally so that system benefits, even if limited during the initial phases, will be realized prior to completion of construction of the entire Project.

The FTA and DTS appreciate your interest in the Project. The Final EIS has been issued in conjunction with the distribution of this letter. You may view the Final EIS on the Project website at www.honolulutransit.org. You may request a DVD of the Final EIS and additional content through the "Contact Us" tab on the website or by calling the Project hotline at 566-2299. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Public Hearing Transcripts

AR00003656

Honolulu High-Capacity Transit Corridor Project

Draft Environmental Impact

Statement/Section 4(f) Evaluation

Public Meeting and Hearing

December 6, 2008

Kapolei Hale

1000 Uluohia Street

Kapolei, Hawaii

9:00 a.m. - 11:00 a.m.

REPORTER'S TRANSCRIPT

OF

PUBLIC HEARING

BEFORE: ELSIE TERADA, CSR NO. 437
Certified Shorthand Reporter

I N D E X

Page

OPENING COMMENTS:

By Hearing Officer Toru Hamayasu 4

SPEAKERS:

Representative Kimberly Pine 7
District 43
Hawaii State Capitol
415 South Beretania Street, Room 317
Honolulu, Hawaii 96813

Rodlyn Brown 9
85-303 Kohai Place
Waianae, Hawaii 96792

Frank Genadio 10
92-1370 Kikaha Street
Kapolei, Hawaii 96707

Michael Golojuch, Jr. 14
92-954 Makakilo Drive, #71
Kapolei, Hawaii 96707

Michael Golojuch 15
Makakilo/Kapolei/Honokai Hale Neighborhood Board
Vice Chairman and Transportation Chairman
(Address not provided)

Pat Patterson 17
AARP and Concerned Elders of Waianae
84-755 Ala Mahiku Street, #72-A
Waianae, Hawaii 96792

Tesha Malama 19
Hawaii Community Development Authority, Kalaeloa
District
91-818 Lawalu Place

Ewa Beach, Hawaii 96706

John Higgins 21
91-503 Pupu Street
Ewa Beach, Hawaii 96706

(continued)

Sharon E. Har 23
Public Safety and Military Affairs Vice Chair
40th District - Kapolei, Makakilo, Royal Kunia, Kalaeloa
House of Representatives
Hawaii State Capitol
415 South Beretania Street, Room 313
Honolulu, Hawaii 96813

Rosita Sipirok-Siregr 26
92-1179 Palahia Street, #102
Kapolei, Hawaii 96707

HEARING OFFICER HAMAYASU: Good morning. I'm Toru Hamayasu, the 2nd Deputy Director of the City and County of Honolulu, Department of Transportation Services. I am the hearing officer for this public hearing for the Draft Environmental Impact Statement for the Honolulu High-Capacity Transit Corridor Project.

The purpose of this public hearing is to collect comments related to the proposed transit project regarding the Draft EIS; Section 106 of the National Historic Preservation Act process; Section 4(f) of the U.S. Department of Transportation Act; Right-of-way acquisition; and floodplains affected by the project.

Public input can be made in four ways:

1) Public spoken testimony to me here, in the Public Hearing Room.

2) If you do not wish to speak in public, an individual spoken testimony for the record can be made to the hearing recorder, who is

near the Public Involvement station in the Project Information Area.

3) Written testimony may be deposited in the black comment box at the meeting, delivered to the Department of Transportation Services office, or mailed or faxed [(808)523-4730] to DTS by January 7, 2009.

4) And finally, testimony can be submitted online by January 7, 2009, at www.honolulutransit.org.

All comments and responses will be included in the Final EIS. Revisions to the EIS will be made as appropriate, based on comments.

The hearing procedures are as follows:

1. Elected and public officials will be heard first. Persons desiring to testify should register at the entrance to the hearing room, and will be called in order of registration.

2. Any individual may appear and speak for him or herself, or if duly authorized, for any local civic group, organization, club or association, subject to the rules provided herein. Speakers should give their name and address. If representing a group, this information should also be given.

3. Speakers must limit their statements to three minutes. Additional prepared statements or literature, pertaining to the project, may be submitted at this hearing or by 4:30 p.m., January 7, 2009 to Department of Transportation Services. These statements will be made part of the official record if they include a legible name and address.

4. For these hearings, all statements, oral or written, should be directed to the hearing officer and must be related to the subject matter of the hearing.

5. Each person speaking before the audience must do so at the floor microphone. We will call testifiers in groups of three to facilitate orderly progress. Please ensure you are in the hearing area at the time your name is called. A court stenographer will record and transcribe the hearing proceedings. If required, I will announce any other specific rules governing this hearing.

6. As part of this public hearing process, the Honolulu Rail Transit Project Team is not allowed to respond to any questions or concerns raised by the speaker. The Project Team will be available to address your questions in the

Project Information Area outside of this hearing venue.

It is now 9:07 a.m. At this time, I would like to begin the public testimony. The first testifier, I think you were given No. 1, Testifier, please come to the microphone.

-oOo-

REPRESENTATIVE KIMBERLY PINE: Good morning. I am Representative Kimberly Pine, and I represent District 43, Ewa Beach, at the State Capitol, in the House of Representatives. First, I'm excited to be here. I'm glad that the voters have spoken and we can now move on to the real thing, so thank you for having me here. We will have more thorough written documentation of our comments before the January 7th deadline, but I first do want to express some feelings brought to me by some Ewa residents. We do feel strongly that the route should go to the airport, and that that shouldn't be changed, so we hope that that does happen. In our private poll, we discovered that

about 25 percent of the citizens in my district do work at Pearl Harbor, and so that does not include those that work at the airport, so it will increase the number of people using the facility if the route goes to the airport.

According to what we have reviewed so far -- we're still reading that 400-page document, but we do not see anything defined in terms of baggage use. If we do change the route to the airport, we should include something that's more defined that would allow people to bring multiple baggage. Also, we did not see in the document that we read so far, that there is nothing to accommodate bicycles, and so we really believe to encourage all types of connectivity, that that should be more thoroughly defined. Definitely, we believe that there should be a more thorough planning in terms of the connectivity with the colleges. Definitely, U.H. West Oahu is in there, and we're definitely pushing for the U.H. Manoa connection.

In terms of emergency evacuation procedures, my district is concerned about something being more defined in terms of power failure and evacuation procedures for safety reasons. But that's it for now. Thank you so much for having

me, and we will have a written document to you very shortly. Mahalo.

-oOo-

HEARING OFFICER HAMAYASU: Please, No. 2.

RODLYN BROWN: My name is Rodlyn Brown, and I'm from Waianae. First thing is, I am in favor of the train. But being from Waianae, with one road, we have a very difficult time getting here or getting home. Yesterday, it took the people two hours to get from Kapolei to Waianae, after the roads had been cleared of construction work. So if this group wants to help and have our support from the Waianae Coast, they have to do something about the second road out of Waianae.

There is no alternative. We are the only location on the entire island that has no way in or out, except for Farrington Highway.

And we need to get to the train just like everybody else does, and we are supportive of the train, in every way, but we need this group to be supportive of us. So if you would please consider the fact that federal funds are for all the people, not some of the people, and that more and more residents are coming to Kapolei and Makakilo, and from Kapolei, all the way to Makaha, and our commute just from Kapolei, home, two hours now, three hours next year, six hours out of our day, every day, please, please, support our needs, as we will support yours. Thank you.

-oOo-

HEARING OFFICER HAMAYASU: No. 3, please step up, and if No. 4 person can come forward and take the seat.

FRANK GENADIO: Frank Genadio, Makakilo. The city administration has apparently taken the selection of the transit technology from the City Council, which killed the ballot question for a fixed guideway, instead passed one with steel wheels wording. Approval of steel wheels on the

ballot does not eliminate other suppliers from the competition, but the EIS brushes off three technologies by using a recommendation from a so-called expert panel. This limiting of alternatives was referred to in the state's review of the EIS as troubling.

I am here to support the HSST urban mag-lev system. EIS Chapter 02 covers Alternatives Considered. In Section 2.1.3, magnetic levitation is listed as a proprietary system unproven in the U.S. Because it is not in the U.S., does not make it unproven. Using this rationale would leave us still traveling in covered wagons. The Federal Transit Administration calls the HSST a mature technology, and the system has been in highly reliable revenue service in Japan since early 2005.

The EIS states that "none of the proprietary technologies offered substantial proven performance, cost, and reliability benefits compared to steel wheel operating on steel rail." For the mag-lev, that statement is false. It is faster, much quieter, and safer because of its wrap-around-the-beam configuration. Its guideway is 20 percent cheaper to build. This is important

when one examines guideway length for the three alternatives and compares costs in Chapter 06 with expected sources of funds.

The city has funding for a 20-mile MOS, but in Section 2.2.2 shows a combined airport and Salt Lake alternative of 25 miles. This not only places the project over projected budgets, but excludes any extension to the UH-Manoa campus. Personally, I favor the airport routing, over Salt Lake. If, however, the HSST were to win the transit competition, it could satisfy most requirements.

If labor and materials planned for the MOS were applied to the mag-lev, five added miles of guideway could be built within the MOS budget and timelines, accommodating an airport alignment, extension to UH-Manoa, and spurs into Salt Lake, as well as Waikiki. The only way to take advantage of such costs savings is to ensure that guideway specifications are left open.

Figure 2-9 shows a guideway of 28 to 32 feet, as well as a wall for noise mitigation. The HSST uses two beams with open space between the beams and a cross-section of 21 feet, with no need for noise walls. The mag-lev's narrower

guideway -- (3-minute time limit) -- coupled with the much lower sound level of the system, will result in less impact on homes and businesses along the route. Figure 2-9 should be deleted and kept...

HEARING OFFICER HAMAYASU: Please summarize.

FRANK GENADIO: I just have a couple.

HEARING OFFICER HAMAYASU: Okay.

FRANK GENADIO: ...should be deleted and kept out of the RFP.

O&M costs also for mag-lev, $12-to-18 million less per year than the steel wheel. Prevent the mag-lev from competing and we pay more for what may be an inferior system. If the city is so certain that steel on steel is superior, modify this EIS appropriately and keep specifications general enough to enable all suppliers to have a chance. After I testified to Council the other day, someone came up to me and said that adding...

HEARING OFFICER HAMAYASU: Please summarize.

FRANK GENADIO: I just have the one sentence.

HEARING OFFICER HAMAYASU: Go on.

FRANK GENADIO: ...adding $1.5 million to EIS, that's one 36,000th of the cost of the project.

This would be money well spent. Thank you.

-oOo-

HEARING OFFICER HAMAYASU: Please, No. 4, step forward.

MICHAEL GOLOJUCH, JR.: Michael Golojuch, Jr.,

Makakilo resident. I'm here today to testify in favor of the steel on steel rail, with the airport route. It doesn't make any sense that we would not have included the airport in the first time around. We know Romy Cachola used his little power, got what we wanted and now he's -- then he decided that he didn't really want to support rail. So I do come out here today to ask that we do move forward, we do move forward with keeping it in the original, starting off in Kapolei and moving forward. By building it and starting in Pearl City, you are going to displace more people, you are going to cause more people to lose their homes and businesses quickly, without giving them chance to really relocate. It doesn't make any sense. We could start off by building the base yard here, on Kapolei, where there's plenty of space and we can move forward. That's basically it. Thank you.

-oOo-

HEARING OFFICER HAMAYASU: No. 5.

MICHAEL GOLOJUCH: Good morning. I'm Michael Golojuch. I am the Vice Chair and the Transportation Chair of the Makakilo/Kapolei/Honokai Hale Neighborhood Board. We support the rail system and we support the MOS, with the airport route. Eventually, we would like to see the rail system expanded, but we know we gotta get the MOS built first, 'cause we want it to go to U.H. I'd like to see it go to Waianae and I'd like to see it go to other locations, too. And some day, I would like to go to the U.H. game by getting on the bus, coming down, getting on the rail, then getting off by the stadium.

We really believe that we need this system. There are some things -- Maeda Timson, the Chair, could not be here because she's on a trip. We will be submitting written testimony, as well as just my verbal support today. As an individual, I know it's important to get this done. It's important to start with Kapolei, where there's less problems, to start, and get it going and moving it fast, and finding out where there may be problems in the construction, so by the time it gets through Waipahu, Pearl City, et cetera, and through town, that will be done. Plus

we'll have the base yard. We have the area, and the lands are already being designated from the Draft EIS for that, and we won't have to disturb, as previously mentioned, as many residents and/or businesses to get that first segment built up, in the Kapolei area. And I strongly support that, and don't let the political part get in there for people running for different offices just to use this now as another pay, getting their ploys.

So, again, support the system, and on specifics and things, and as mentioned, there is a need for people to carry luggage. Maybe not a lot of luggage 'cause I really see the people going by the airport, the business people coming in and not more than tourists, but there still needs to be that capability for both to use the rail system. Thank you.

-oOo-

HEARING OFFICER HAMAYASU: No. 6. Do you have the name of the person?

UNIDENTIFIED SPEAKER: She cancelled.

HEARING OFFICER HAMAYASU: Okay. No. 7?

No. 8, please step forward and take the seat in the front.

PAT PATTERSON: Aloha. I'm Pat Patterson from Makaha Valley, a member of AARP and of Concerned Elders of Waianae. I have three issues. First of all, I really resent all my taxpayer money that was spent on the slick stuff to get people to vote for the rail steel on steel. I think the vote was so close, that it should not have been counted yea.

No. 2. I really respect Jim Brewer and Renee Ing for having gone to Europe and tried out the Phileas Magnet-Rail, brought back and shown on Olelo, how wonderful that is, with the bus-train moving only on magnets in the pavement. That would be very, very inexpensive, would be done quickly, would use a lot of our workers and be much more compatible with our island.

And No. 3. If you really want rail, why don't you restore the old OR&L, all the way to Kaena Point, and give the Waianae-Makaha residents access to what's going to be way beyond, and we are people who have to work in town. We really need something. The 93 bus is wonderful, the country express is good as far as it goes, but think about restoring OR&L, all the way to the end of the island on the southwest end. Mahalo.

-oOo-

HEARING OFFICER HAMAYASU: No. 8.

TESHA MALAMA: My name is Tesha Malama. I am an Ewa Beach resident and also responsible for the Kalaeloa District. I am speaking in favor of the rail project, the minimum operating segment, and also with the alignment through to the airport. As an Ewa Beach resident, if we had the leadership and commitment to do these types of projects 10 years ago for the widening of Fort Weaver Road, and 15 years ago, to bring in the North-South Road, we would not be in the hell we live in now, in Ewa Beach. This rail project will add to the multi-motor approach that we need, as a county, to move people around this entire island. I think one of the integral parts of the rail will be how TheBus system links up to the rail centers and getting the community involved in planning the rail center points.

And so we need, No. 1, the infrastructure money that it's going to bring in, so people have

immediate jobs during this time of the economic system. Being responsible for Kalaeloa, I need to have that type of commitment and funding that it will bring into the district. As we build out Kalaeloa, access for Ewa Beach residents to the rail center will be less than five minutes from every household in Ewa Beach. We need everything, we need it now, and I say whoever is going to get on the rail late, they should really move aside, so we can get this project done. Thank you.

-oOo-

HEARING OFFICER HAMAYASU: No. 9.

JOHN HIGGINS: Good morning. My name is John Higgins, I'm an Ewa Beach resident. I'm here to support the rail system and going through the airport route. I think that we should have a firm commitment on federal money. I know that that's been given to us, but in speaking to people next door, there was no indication of when the federal money would actually come, and with the economic situation the way it is, I think we should have a firm commitment from the next administration in Washington, that we're going to get this money. Now, we got great senators, and congressmen, and Democratic president, which would bow to having us get the money, but we need a firm commitment. That money, if the federal money doesn't come, this project will stop dead in its tracks.

The other thing is, too, that the people that we see in the newspaper, talking about this project, Charles Djou, Romy Cachola, and the Mayor or one of his representatives are not here. They should be at every single one of these things for the two hours thereon to speak to the people. They've been spending millions of dollars to promote this, which I agree with, it should be done. But these politicians should be here to answer questions, to talk to us and let us talk to them. And that's my statement. Thank you.

-oOo-

HEARING OFFICER HAMAYASU: No. 10.

REPRESENTATIVE SHARON HAR: Thank you. Good morning. I'm Representative Sharon Har. I am the State Representative for the 40th District, which is comprised of Kapolei, Makakilo, Royal Kunia, and Kalaeloa. I am one of those politicians who is here today, and while the rail is not a State issue, it is a City and County issue. I do know that we have the firm commitment of our Mayor, as well as our council representatives on this side of the island. We do have the Mayor's representatives here, but I am here on behalf of myself as a private citizen and representative of Kapolei.

First of all, as the Chair of the 2007

Interim Task Force on Smart Growth Development, I am an ardent supporter of the rail's first segment, beginning here, in East Kapolei. Because one of the basic principles of smart growth development is transit-oriented development. With all the development that we have occurring out here in our great new city and on the west side of the island, you must have transit beginning here, so that we can build smart growth projects. Smart growth projects basically incorporate transit around them, and it's one of the most effective tools to prevent urban sprawl. And that is my biggest concern, as we continue to develop on this side of the island. If government has decided that all of the development is going to happen on the west side of the island, then we must build under the principles of smart growth development, and transit-oriented development is one of the basic ten principles of smart growth.

Secondly, one of the issues that came up in the Draft Environmental Impact Statement, was the fact that the two proposed base yards are located on the Leeward side of Oahu. In order for the transit to be developed, you have to have a base yard. And if the two proposed sites are out

here, then, accordingly, you have to have the beginning segments out here, where the base yards are located.

Finally, my last point is that, again, to begin out on the west side of the island is imperative because you have to have construction in an area that's relatively undeveloped. There is so much built, you can't develop anymore in Aiea or in the urban core. It makes sense to build out here, when you have relatively least amount of development, and then as we build more houses, we build around transit, so that, again, we're promoting the principles of smart growth.

So, I do have copies of my testimony, as well. I thank you for this opportunity to testify.

-oOo-

HEARING OFFICER HAMAYASU: No. 11.

ROSITA SIPIROK-SIREGR: Good morning, panel. My name is Rosita, and I am a resident of Makakilo. I'm here to testify just as a regular resident who has been catching the bus every day for 20 years. My concern is not really that I'm going to miss my express bus, but it takes only 30 minutes from Kapolei, Makakilo to Dillingham, and it takes 25 minutes from Dillingham to downtown. So I would support the first, the new idea of

starting the system in downtown because if something ever happened, at least it will alleviate the traffic in downtown first, and not stuck here in the middle of the island. That's my first concern.

My second concern is, is the system going to have an express system during the rush hours, during the morning and in the afternoon? Thank you.

-oOo-

HEARING OFFICER HAMAYASU: No. 12. That's it?

Is anybody else present who would like to provide a comment on the project issue?

UNIDENTIFIED SPEAKER: Can I ask questions?

HEARING OFFICER HAMAYASU: If there are questions, there are people in the next room.

UNIDENTIFIED SPEAKER: Can I make an additional comment?

HEARING OFFICER HAMAYASU: I'm sorry, no. You can submit your written testimony later, with additional comments.

With nobody else interested in providing comment, I conclude this hearing at 9:31. Thank you for your time and interest in the Project.

(Session concluded at 9:31 a.m.)

-oOo-

STATE OF HAWAII)
) ss.
COUNTY OF HONOLULU)

I, Elsie Terada, Certified Shorthand Reporter, Certificate No. 437, for the State of Hawaii, hereby certify:

I am the person that stenographically

recorded the proceedings.

The foregoing transcript is a true record of said proceedings.

Dated this 26th day of December, 2008, in Honolulu, Hawaii.

_____

ELSIE TERADA, CSR NO. 437
Notary Public, State of Hawaii

My Commission Expires: 4-07-2010

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, 3RD FLOOR
HONOLULU, HAWAII 96813
Phone: (808) 768-8305 • Fax: (808) 768-4730 • Internet: www.honolulu.gov

MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-332364

The Honorable Kymberly Pine
House of Representatives
State Capitol
Honolulu, Hawaii 96813

Dear Representative Pine:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

Your preference for the Airport Alternative has been noted. While each of the alternatives discussed in the Draft EIS includes trade-offs between benefits and impacts, the Airport Alternative from East Kapolei to Ala Moana has been selected as the Preferred Alternative as described above. As compared to the alternatives discussed in the Draft EIS, the Airport Alternative will carry the most passengers, provide the greatest transit-user benefits, and result in the fewest vehicle hours of delay. It will provide access to employment centers at Pearl Harbor Naval Base and Honolulu International Airport and will serve the Salt Lake neighborhood with connecting bus service. Of the three Build Alternatives addressed in the Draft EIS, the Airport Alternative will have slightly less impacts to the natural and built environment analyzed in the Draft EIS. During the public comment period on the Draft EIS, the public overwhelmingly supported the Airport Alternative. Of the comments that specifically supported one of the alternatives, more than 75 percent were in support of the Airport Alternative. For more information this selection is discussed in Section 2.4 of the Final EIS. Since publication of the Draft EIS, design has been advanced, further analysis has been completed, and information has been added in response to comments on the Draft EIS and agency coordination. The Final EIS discusses the process that was used to select the Preferred Alternative, how comments were considered in the decision-making process, impacts and mitigation commitments.

In response to your questions regarding luggage and bicycle concerns, luggage that does not interfere with the safety or comfort of other passengers will be allowed on the train. Bicycles will be allowed on the system and regulated by a bicycle policy to be developed. To better accommodate bicyclists, many of the rail stations also will be located at or near existing or planned bicycle facilities. Each station will have facilities for parking bikes.

The fixed guideway system extends from East Kapolei to Ala Moana Center and points in-between. The Project includes stations at UH West Oahu, Leeward Community College, and Honolulu Community College. The Project has logical termini at East Kapolei and Ala Moana Center and independent utility from any extensions that may be constructed in the future. The future extensions to West Kapolei, Salt Lake Boulevard, Waikiki, and UH Manoa are discussed in the cumulative impacts sections of Chapters 3 and 4 of the Final EIS; however the future extensions are not part of this Project, thus they are not required to be evaluated under Chapter 343 of the Hawaii Revised Statutes and NEPA. Under NEPA, environmental analysis is only required when there is a proposed action by a Federal agency. Here, because the future extensions are not proposed for implementation at this time, they are not part of the Project studied in the Final EIS. It would be premature to undertake an environmental analysis of the extensions (beyond the cumulative impacts analysis) because they are not part of the proposed action to be taken by the City and FTA. If the future extensions are proposed for implementation in the future, environmental analysis of the extensions and appropriate alternatives will be undertaken at that time. Connection to UH Manoa and Waikiki will be served by buses integrated with the system.

Lastly, to address your concern regarding safety issues during possible power failures. Since trains and rail stations will be electrically powered, the system's infrastructure is being designed to handle service disruptions. For example, trains will draw power from many points along the route, so an outage in a few areas should not disrupt service. If electrical power is lost systemwide, then train brakes are designed to stop the rail cars even without power. Lights will stay on in trains and stations; backup batteries will provide lighting for several hours. The train operations center will communicate with passengers via the public address system and intercom and provide guidance. If power is restored within a short time, service will resume. With a prolonged outage, the operations center will direct passengers to exit the trains and walk along a lighted emergency walkway on the guideway to the nearest station. For those unable to exit rail cars, help will be provided by emergency responders and transit staff. Passengers will be met at the train station by a coordinated response from emergency responders and City transportation workers.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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HONOLULU, HAWAII 96813
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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-332369

Ms. Rodlyn Brown
85-303 Kohai Place
Waianae, Hawaii 96792

Dear Ms. Brown:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraph addresses your comments regarding the above-referenced submittal:

Your preference for the Fixed Guideway Transit Alternative is noted. We also note your request for a second access roadway to and from the Waianae area. However, a second access road is outside of the scope of this Project.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

KENNETH TORU HAMAYASU
DEPUTY DIRECTOR

June 11, 2010

RT10/09-336959

Mr. Frank Genadio
92-1370 Kikaha Street
Kapolei, Hawaii 96707

Dear Mr. Genadio:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address comments regarding the above-referenced submittal:

As stated in Section 2.2.3 of this Final EIS, the NEPA Notice of Intent requested input on five transit technologies. A technical review process included the opportunity for public comment and was used in parallel with the alternatives analysis to select a transit technology. The process included a broad request for information that was publicized to the transit industry. Transit vehicle manufacturers submitted 12 responses covering all of the technologies listed in the Notice of Intent. An independent five-member technology panel composed of four transit experts and a transportation academic appointed by the City Council evaluated guided rubber-tire-on-concrete systems (e.g., Phileas bus system and VAL-type systems), monorail (which is a variation on rubber-tyred technology), steel-wheel-on-steel-rail systems, (e.g., light rail and rapid rail), and magnetic levitation (MAGLEV). The panel considered the performance, cost, and reliability of the proposed technologies.

Proprietary technologies, meaning those technologies that would have required all future purchases of vehicles or equipment to be from a single manufacturer, were eliminated because none of the proprietary technologies offered substantial proven performance, cost, and reliability benefits compared to steel wheel operating on steel rail.

The panel accepted public comment twice as part of its review. By a four-to-one vote, the panel

chose a steel wheel vehicle operating on steel rail system because it was considered safe, reliable, economical, and non-proprietary. Those results are documented in the panel's report to the City Council dated February 22, 2008 entitled "Independent Technology Selection Panel Report".

There is one operating urban magnetic levitation system in the world, and it has less than five years of operating record. The single operating system has a maximum speed of 100 kilometers per hour (62 miles per hour), which is similar to the maximum operating speeds of 50 to 60 miles per hour common for steel wheel systems. While the system is quieter, other systems may be designed to match the noise level of magnetic levitation when in operation. There are no specific safety improvements from the traction design. The assumed visual benefits for beam-track vehicles would not apply in the U.S. because of requirements to include an emergency egress walkway. In addition, the smaller structures proposed in the comment result in shorter span lengths, which increases the number of columns required and the percentage of views blocked by the support structure, which would result in higher costs.

In addition, the magnetic levitation system would not provide a net benefit or proven cost savings. To date, the High Speed Surface Transport system operators have declined to make operating expenses available. No comparative maglev project has ever been built within the U.S. Therefore, no data are available to support a cost estimate. With no comparative data available to support an operating cost estimate, there are no means to verify this statement regarding maglev's operating and maintenance costs compared to a steel wheel system. The demonstrated operating speed of 100 kilometers per hour for urban magnetic levitation is similar to that of steel wheel systems.

The capital plan for the Project is presented in Section 6.3 of the Final EIS, which includes a description of the amount of funding anticipated from various sources. The capital plan takes the current economic downturn into account. Section 6.6 discusses the risks and uncertainties associated with the financial analysis prepared for the Project, including risks related to changes in project scope. If the Project is over budget, other sources of revenue have been identified in 6.3.3 and 6.6.3, which could include private funds (i.e., contributions toward the cost of building stations) or airport funds; however, $1.3 billion in year-of-expenditure dollars is included in the project budget as contingency for just such eventualities.

Magnetic levitation requires a different guideway design that would have different impacts from a steel-wheel system, as presented in the above discussion. The guideway design is being completed only for the technology that will be used for the Project.

Section 2.2.2 of the Draft EIS discusses the four alternatives evaluated as part of the Draft EIS and included a No Build Alternative and three Build Alternatives (Salt Lake Alternative, Airport Alternative, and the Airport and Salt Lake Alternative). Your preference for the Airport Alternative has been noted. While each of the alternatives includes trade-offs between benefits and impacts, the Airport Alternative from East Kapolei to Ala Moana Center has been selected as the Preferred Alternative.

Your preference for the Airport Alternative has been noted. While each of the alternatives discussed in the Draft EIS includes trade-offs between benefits and impacts, the Airport Alternative from East Kapolei to Ala Moana has been identified as the Preferred Alternative as described above. Compared to the other alternatives discussed in the Draft EIS, the Airport Alternative will carry the most passengers, provide the greatest transit-user benefits, and result in the fewest vehicle hours of delay. It will provide access to employment centers at Pearl Harbor Naval Base and Honolulu International Airport and will serve the Salt Lake neighborhood with connecting bus service. Of the three Build Alternatives addressed in the Draft EIS, the Airport Alternative will have slightly lower impacts to the natural and built environment. During the public comment period on the Draft EIS, the public overwhelmingly supported

the Airport Alternative. Of the comments that specifically supported one of the alternatives, more than 75 percent were in support of the Airport Alternative.

The selection of the Airport Alternative as the Project is described in Chapter 2 of this Final EIS. Also, as discussed in Section 3.4.2 of this Final EIS, the Airport Alternative will carry the most passengers with 116,000 daily passengers and 282,500 daily trips in 2030, thereby resulting in the greatest transit-user benefits. Compared to the other alternatives considered, the Airport Alternative will also result in the fewest vehicle miles traveled and vehicle hours of delay, as well as provide access to major employment areas including Honolulu International Airport, and will have substantially greater ridership than the other alternatives considered in the Draft EIS.

23 CFR 771.111(f) states "The action evaluated in each EIS…shall not restrict consideration of alternatives for any other reasonable foreseeable transportation improvements". Future transit improvements, including an extension to the U.H. Manoa campus will not be precluded by the implementation of the Project.

As described above, steel wheel technology has been selected for the Project and proposed changes to the Final EIS that are not consistent with the selected technology, including removal of the figure showing guideway cross-section, have not been made. As previously explained, there is no available data to support the estimated costs included in the comment.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

DEPARTMENT OF TRANSPORTATION SERVICES

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-332370

Mr. Michael Golojuch, Jr.
92-954 Makakilo Drive, #71
Kapolei, Hawaii 96707

Dear Mr. Golojuch:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

Your preference for steel wheel on steel rail and the Airport Alternative has been noted. While each of the alternatives discussed in the Draft EIS includes trade-offs between benefits and impacts, the Airport Alternative from East Kapolei to Ala Moana has been selected as the Preferred Alternative as described above. As compared to the alternatives discussed in the Draft EIS, the Airport Alternative will carry the most passengers, provide the greatest transit-user benefits, and result in the fewest vehicle hours of delay. It will provide access to employment centers at Pearl Harbor Naval Base and Honolulu International Airport and will serve the Salt Lake neighborhood with connecting bus service. Of the three Build Alternatives addressed in the Draft EIS, the Airport Alternative will have slightly less impacts to the natural and built environment analyzed in the Draft EIS. During the public comment period on the Draft EIS, the public overwhelmingly supported the Airport Alternative. Of the comments that specifically supported one of the alternatives, more than 75 percent were in support of the Airport Alternative. For more information this selection is discussed in Section 2.4 of the Final EIS. Since publication of the Draft EIS, design has been advanced, further analysis has been completed, and information has been added in response to comments on the Draft EIS and

agency coordination. The Final EIS discusses the process that was used to select the Preferred Alternative, how comments were considered in the decision-making process, impacts and mitigation commitments.

As described in Section 2.5.10, Project Phasing, and further in Section 8.6.9, Construction Phasing, in the Final EIS, to support phased opening, the first construction phase must be connected to a maintenance and storage facility, which requires considerable space. No location has been identified closer to Downtown with sufficient available space to construct a maintenance and storage facility. Therefore, construction will begin between East Kapolei and Leeward Community College. The Project will be constructed in phases to accomplish the following:

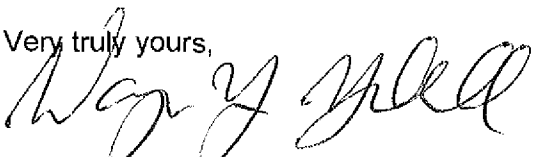
- *Match the anticipated schedule for right-of-way acquisition and utility relocations.*
- *Reduce the time that each area will experience traffic and community disturbances.*
- *Allow for multiple construction contracts with smaller contract size to promote more competitive bidding.*
- *Match the rate of construction to what can be maintained with local workforce and available financial resources.*
- *Balance expenditure of funds to minimize borrowing.*

The portion of the corridor in the Ewa direction of Pearl Highlands is less developed than the areas in the Koko Head direction. Right-of-way can be obtained more quickly at the west end of the Project; therefore, overall project construction can begin earlier, resulting in lower total construction costs. Construction is planned to continue uninterrupted in the Koko Head direction from Pearl Highlands to Aloha Stadium, Kalihi, and finally to Ala Moana Center.

As portions of the Project are completed, each will be opened incrementally so that system benefits, even if limited during the initial phases, will be realized prior to completion of construction of the entire Project.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,



WAYNE Y. YOSHIOKA
Director

Enclosure

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-332373

Mr. Michael Golojuch
Makakilo/Kapolei/Honokai Hale Neighborhood
Board No. 34
c/o Neighborhood Commission Office
City Hall, Room 406
Honolulu, Hawaii 96813

Dear Mr. Golojuch:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

Your preference for the Airport Alternative has been noted. While each of the alternatives discussed in the Draft EIS includes trade-offs between benefits and impacts, the Airport Alternative from East Kapolei to Ala Moana has been identified as the Preferred Alternative as described above. Compared to the other alternatives discussed in the Draft EIS, the Airport Alternative will carry the most passengers, provide the greatest transit-user benefits, and result in the fewest vehicle hours of delay. It will provide access to employment centers at Pearl Harbor Naval Base and Honolulu International Airport and will serve the Salt Lake neighborhood with connecting bus service. Of the three Build Alternatives addressed in the Draft EIS, the Airport Alternative will have slightly lower impacts to the natural and built environment. During the public comment period on the Draft EIS, the public overwhelmingly supported the Airport Alternative. Of the comments that specifically supported one of the alternatives, more than 75 percent were in support of the Airport Alternative.

As described in Section 2.5.10, Project Phasing, and further in Section 8.6.9, Construction Phasing, in the Final EIS, to support phased opening, the first construction phase must be connected to a maintenance and storage facility, which requires considerable space. No location has been identified closer to Downtown with sufficient available space to construct a maintenance and storage facility.

Therefore, construction will begin between East Kapolei and Leeward Community College. The Project will be constructed in phases to accomplish the following:

- *Match the anticipated schedule for right-of-way acquisition and utility relocations.*
- *Reduce the time that each area will experience traffic and community disturbances.*
- *Allow for multiple construction contracts with smaller contract size to promote more competitive bidding.*
- *Match the rate of construction to what can be maintained with local workforce and available financial resources.*
- *Balance expenditure of funds to minimize borrowing.*

The portion of the corridor in the Ewa direction of Pearl Highlands is less developed than the areas in the Koko Head direction. Right-of-way can be obtained more quickly at the west end of the Project; therefore, overall project construction can begin earlier, resulting in lower total construction costs. Construction is planned to continue uninterrupted in the Koko Head direction from Pearl Highlands to Aloha Stadium, Kalihi, and finally to Ala Moana Center.

As portions of the Project are completed, each will be opened incrementally so that system benefits, even if limited during the initial phases, will be realized prior to completion of construction of the entire Project.

The policy, yet to be developed, will include provisions to allow luggage on the system as long as it does not interfere with the safety and comfort of other riders.

The FTA and DTS appreciate your interest in the Project. The Final EIS has been issued in conjunction with the distribution of this letter. You may view the Final EIS on the Project website at www.honolulutransit.org. You may request a DVD of the Final EIS and additional content through the "Contact Us" tab on the website or by calling the Project hotline at 566-2299. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-332386

Ms. Pat Patterson
AARP and Concerned Elders of Waianae
84-755 Ala Mahiku Street, #72-A
Waianae, Hawaii 96792

Dear Ms. Patterson:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

Your concerns have been noted. Guidelines set forth by the NEPA of 1966, as amended, and also Chapter 343 of the Hawaii Revised Statutes stipulate that public involvement be carried out on large scale projects such as the rail project. As one of the largest infrastructure projects ever to be constructed on Oahu, the City felt that it was important to disseminate information to as many people as possible. Thus, a broad range of print and visual media was necessary to reach different population segments. Project funds paid for the public involvement activities listed in Chapter 8 of the Final EIS.

In regards to your second issue, alternatives that relied only on bus transit were evaluated during the Alternatives Analysis phase and shown to be less effective than the Fixed Guideway Transit Alternative. Chapter 2 of the Final EIS summarizes those findings.

Lastly, as also described in Chapter 2 of the Final EIS, several alignments were evaluated during the Alternatives Analysis phase. One evaluated alignment was the historic OR&L line. A combination of issues, including utilities that have been placed in the right-of-way, poor location in several places, and the previous loss of the right-of-way in several locations, all contributed to the elimination of that option. The Project is fully grade-separated to eliminate potential conflicts with traffic and eliminate the effects of congestion and incidents on the system. Placing any part of the system at-grade would affect reliability of the entire system. The limits of the study corridor are explained in Chapter 1 of the Final EIS.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT10/09-336961

Ms. Tesha Malama
Hawaii Community Development Authority
Kalaeloa District
91-818 Lawalu Place
Ewa Beach, Hawaii 96706

Dear Ms. Malama:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

Your preference for the Airport Alternative has been noted. While each of the alternatives discussed in the Draft EIS includes trade-offs between benefits and impacts, the Airport Alternative from East Kapolei to Ala Moana has been selected as the Preferred Alternative as described above. As compared to the alternatives discussed in the Draft EIS, the Airport Alternative will carry the most passengers, provide the greatest transit-user benefits, and result in the fewest vehicle hours of delay. It will provide access to employment centers at Pearl Harbor Naval Base and Honolulu International Airport and will serve the Salt Lake neighborhood with connecting bus service. Of the three Build Alternatives addressed in the Draft EIS, the Airport Alternative will have slightly less impacts to the natural and built environment analyzed in the Draft EIS. During the public comment period on the Draft EIS, the public overwhelmingly

supported the Airport Alternative. Of the comments that specifically supported one of the alternatives, more than 75 percent were in support of the Airport Alternative. For more information this selection is discussed in Section 2.4 of the Final EIS. Since publication of the Draft EIS, design has been advanced, further analysis has been completed, and information has been added in response to comments on the Draft EIS and agency coordination. The Final EIS discusses the process that was used to select the Preferred Alternative, how comments were considered in the decision-making process, impacts and mitigation commitments.

Local bus service will be rerouted as needed to provide access to the rail system. Bus transit centers will be located at some of the stations, and many of the bus routes serving rail stations will have increased frequencies. A description of existing and future bus routes, including frequency, is included in Appendix D, Bus Transit Routes, in the Final EIS. As the Project undergoes more detailed design, the public will have additional opportunities to be involved in the process. The station area planning process includes conducting workshops with communities that will have rail stations. For more information and to get involved in this process, please visit the Project website at www.honolulutransit.org.

Your support for the Project has been noted.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, 3RD FLOOR
HONOLULU, HAWAII 96813
Phone: (808) 768-8305 • Fax: (808) 768-4730 • Internet: www.honolulu.gov

MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-332394

The Honorable Sharon E. Har
House of Representatives
State Capitol
Honolulu, Hawaii 96813

Dear Representative Har:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

Your support for smart growth and the proposed phasing of construction is noted. The Project is focused exclusively on the construction and implementation of rail transit service, and that is what is covered in the Final EIS. However, as mentioned in Section 4.19.2 of the Final EIS, transit-oriented development (TOD) is expected to occur in project station areas as an indirect effect of the Project. The increased mobility and accessibility that the Project may provide will also increase the desirability and value of properties near the stations, thereby attracting new real estate investment nearby (in the form of TOD). Planning and zoning around station areas will be developed in the future by the City's Department of Planning and Permitting under a process covered by the City's new TOD Ordinance (09-4).

As described in Section 2.5.10, Project Phasing, and further in Section 8.6.9, Construction Phasing, in the Final EIS, to support phased opening, the first construction phase

must be connected to a maintenance and storage facility, which requires considerable space. No location has been identified closer to Downtown with sufficient available space to construct a maintenance and storage facility. Therefore, construction will begin between East Kapolei and Leeward Community College. The Project will be constructed in phases to accomplish the following:

- *Match the anticipated schedule for right-of-way acquisition and utility relocations.*
- *Reduce the time that each area will experience traffic and community disturbances.*
- *Allow for multiple construction contracts with smaller contract size to promote more competitive bidding.*
- *Match the rate of construction to what can be maintained with local workforce and available financial resources.*
- *Balance expenditure of funds to minimize borrowing.*

The portion of the corridor in the Ewa direction of Pearl Highlands is less developed than the areas in the Koko Head direction. Right-of-way can be obtained more quickly at the west end of the Project; therefore, overall project construction can begin earlier, resulting in lower total construction costs. Construction is planned to continue uninterrupted in the Koko Head direction from Pearl Highlands to Aloha Stadium, Kalihi, and finally to Ala Moana Center.

As portions of the Project are completed, each will be opened incrementally so that system benefits, even if limited during the initial phases, will be realized prior to completion of construction of the entire Project.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

DEPARTMENT OF TRANSPORTATION SERVICES

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-332397

Ms. Rosita Sipirok-Siregr
92-1179 Palahia Street, #102
Kapolei, Hawaii 96707

Dear Ms. Sipirok-Siregr:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

As described in Section 2.5.10 of the Final EIS, to support phased opening of the system, the first construction phase must be connected to a maintenance and storage facility, which requires considerable land. The first phase of the Project must be connected to the maintenance and storage facility because, in addition to maintenance of equipment and ongoing operations, the maintenance and storage facility houses the main control center for the entire Project, and the required testing and operation of the system could not be completed without access to it. No location has been identified closer to Downtown with sufficient available land to construct a maintenance and storage facility. The Project will be constructed in phases to accomplish the following:

- *Match the anticipated schedule for right-of-way acquisition and utility relocations*

- *Reduce the time that each area will experience traffic and community disturbances*
- *Allow for multiple construction contracts with smaller contract size to promote more competitive bidding*
- *Match the rate of construction to what can be maintained with local workforce and resources*
- *Balance expenditure of funds to minimize borrowing*

The portion of the corridor Ewa of Pearl Highlands is less developed than the areas Koko Head. As a result, right-of-way can be obtained more quickly and overall project construction can begin earlier, resulting in lower total construction costs. Construction is planned to continue uninterrupted Koko Head from Pearl Highlands to Aloha Stadium, then Kalihi, and finally to Ala Moana Center.

Trains will operate every three minutes in each direction during peak periods (6:00 a.m. to 9:00 a.m. and 3:00 p.m. to 6:00 p.m.). Trains during other times of the day will operate every 6 minutes or 10 minutes depending on the time of day. All trains are anticipated to stop at all stations.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Honolulu High-Capacity Transit Corridor Project

Draft Environmental Impact

Statement/Section 4(f) Evaluation

Public Meeting and Hearing

December 8, 2008

Neal S. Blaisdell Exhibition Hall

777 Ward Avenue

Honolulu, Hawaii

6:30 p.m. - 8:00 p.m.

REPORTER'S TRANSCRIPT

OF

PUBLIC HEARING

BEFORE: ELSIE TERADA, CSR NO. 437
Certified Shorthand Reporter

I N D E X

Page

OPENING COMMENTS:

By Hearing Officer Toru Hamayasu 5

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218 Kuupua Street
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HEARING OFFICER HAMAYASU: Good evening. I am Toru Hamayasu, the 2nd Deputy Director of the City and County of Honolulu Department of Transportation Services. I am the hearing officer for this public hearing for the Draft Environmental Impact Statement for the Honolulu High-Capacity Transit Corridor Project.

The purpose of this public hearing is to collect comments related to the proposed transit project, including the Draft EIS; Section 106 of National Historic Preservation Act process; Section 4(f) of the U.S. Department of Transportation Act; Right-of-way acquisition; and floodplains affected by the project.

Public input can be made in four ways:

1. Public spoken testimony to me here, in the Public Hearing Room.

2. If you do not wish to speak in public, an individual spoken testimony for the record can be made to the hearing recorder, who is near the Public Involvement station in the Project Information Area.

3. Written testimony may be deposited in the black comment box at the meeting, delivered to the Department of Transportation Services office, or mailed or faxed [(808)523-4730] to DTS by January 7, 2009.

And finally, 4. Testimony can be submitted online by January 7, 2009 at www.honolulutransit.org.

All comments and responses will be included in the Final EIS. Revisions to the EIS will be made as appropriate, based on comments.

The hearing procedures are as follows:

1. Elected and public officials will be heard first. Persons desiring to testify should register at the entrance to the hearing room. Names will be called in the order of the registration.

2. Any individual may appear and speak for him or herself, or if duly authorized, for any local civic group, organization, club or

association, subject to the rules provided herein. Speakers should give their name and address. If representing a group, this information should also be given.

3. Speakers must limit their statements to three minutes. When the red light appears, there is one minute remaining for speaker's statement. When the buzzer sounds, the three minutes' period is over. Additional prepared statements or literature, pertaining to the project, may be submitted at this hearing by 4:30 p.m., January 7, 2009 to Department of Transportation Services. These statements will be made part of the official record if they include a legible name and address.

4. For these hearings, all statements, oral or written, should be directed to the Hearing Officer and must be related to the subject matter of the hearing.

5. Each person speaking before the audience must do so at the floor microphone. Please ensure you are in the hearing area at the time your name is called. A court stenographer will record and transcribe the hearing proceedings. If required, I will announce any

other specific rules governing this hearing.

6. As part of this public hearing process, the Honolulu Rail Transit Project Team is not allowed to respond to any questions or concerns raised by the speaker. The Project Team will be available to address your questions in the Project Information Area outside this hearing venue.

It is now 6:14. At this time, I would like to begin the public testimony. The first testifier is Mr. Bob Loy, followed by Mr. Fred Abe and John Kato.

-oOo-

BOB LOY: My name is Bob Loy. I am testifying on behalf of Na Leo Pohai, the public policy affiliate of The Outdoor Circle, Honolulu, Hawaii. The Honolulu transit project is destined to become the singlemost visually dominant, intrusive, obstructive, and destructive construction project in the history of Hawaii. While its ability to ease traffic problems on Oahu has been the subject of lengthy debate. Its negative impact on the

visual environment of this island is beyond any denial, and is virtually immeasurable.

I'm going to take you on a trip along the route, and I'm going to use as the words of the impacts, words that had been taken directly from the Draft Environmental Impact Statement. It will change the open and end of all character of the Ewa Plain, substantially change views in Salt Lake city because of the size of the station and the rail line, obstruct views of East Lot in Pearl Harbor, in Pearl City. In Kahili, the dominant features will be -- the views of this project will be the dominant features down Dillingham Boulevard. In Chinatown, it becomes an esthetic disaster. The blocked makai views and will be out of character with the pedestrian-oriented environment in one of the most historic and sensitive neighborhoods on the island. Passing through and going to downtown, it will be the dominant feature of the views on Nimitz Highway. It will contrast substantially with the pedestrian character in the streetscape and substantially affect the visual setting of Dillingham Transportation Building in Irwin Park. It will block makai views for numerous residents.

Overall, visual effects would be high.

Going through and down towards Ala Moana Center, blocked views in the 4th and 5th floor residences, increased light and glare on upper-story residences. Throughout this part of the city, the project will block protected mauka-makai views of the Koolau mountains, Waianae mountains, Pacific Ocean, Honolulu Harbor, Diamond Head, Punchbowl, and Aliamanu Craters. Overall, the effects will be high.

But for all the destructive and negative impacts on view plains spelled out in the DEIS, there are virtually no details about how these substantial damages will be mitigated. The document contains broad promises of designing various elements to minimize negative visual effects. The lack of specific descriptions of how to overcome the visual misery that will be heaped upon the Oahu landscape, leaves our organization with little confidence that damage to the visual environment can or will be mitigated as the project moves forward.

We also have great concerns about the trees, particularly the kamani trees on Dillingham Boulevard and the monkey-pod trees on Kapiolani

(3-minute limit).

HEARING OFFICER HAMAYASU: Please summarize.

BOB LOY: That's the end. Thank you.

-oOo-

HEARING OFFICER HAMAYASU: Thank you.

Next, Mr. Fred Abe, John Kato, and Sidney Char.

FRED ABE: My name is Fred Abe. I'm an

inactive attorney. I was born in Honolulu, and I lived in Makaha from 1971 to 2007. I will never catch the transit if I was still living in Makaha. The transit does not address the basic problem. The basic problem is to eliminate 50 percent of the commuters that go to and from work, and I'm proposing instead, that all buses be used, and I'm talking about the whole island, not just 20 miles from Kapolei to Honolulu. All buses will be free during that three-hour period in the morning and in the afternoon.

2. The electric buses instead of diesels. And the reason for that, every bus should be enough so that everybody has a seat, whether you're catching the bus in Kahuku, Kailua, Waimanalo, even Hawaii Kai and Kapolei. Right now, between H-1 and the H-2, the Mililani group, including the people from Wahiawa and those from Mililani, if they can catch a bus and free air-condition and they have a seat, I think we can have the people address -- might be able to divorce themselves from riding the cars. Financially, I think it would work.

According to the Honolulu Advertiser of November 23, 2008, it says that we cost 525 buses.

I think we can get a thousand buses on the road, and only during that peak three hours in the morning and three hours in the afternoon. It takes $160 million to operate the buses now, of which the City and County subsidized it by 130 million. I'm suggesting that we will spend maybe 200 million, and instead of an annual subsidy of 130 -- (3-minute limit) -- now, I have more testimony, but the basic thing is how we can get the 50 percent of the cars off of the road. That's the conclusion, and I think it can be done. Thank you.

HEARING OFFICER HAMAYASU: Thank you.

-oOo-

HEARING OFFICER HAMAYASU: Next is John Kato.

JOHN KATO: My name is John Kato, and I'm speaking as a private citizen. I'm a former chair of McCully/Moilili Neighborhood Board No. 8, and I'm speaking in favor of the fixed rail system. I believe the fixed rail system will be a benefit to the members of the community. I believe that a common nature of a transit rail development will be of great use for the people in the community who are property owners. In any rate, that concludes my presentation.

HEARING OFFICER HAMAYASU: Thank you.

-oOo-

HEARING OFFICER HAMAYASU: Next speaker is Sidney Char, followed by Ralph Bruinsslot and Herb Rothouse.

SIDNEY CHAR: Good evening. My name is Sidney Char. I'm the current president of the American Institute of Architects, Honolulu Chapter, and my comments, here, represents the majority viewpoint of our membership and our Transit Task Force. We have submitted written testimony, but I will highlight some of the key points of the testimony.

First of all, for the record, we support the concept and the implementation of a fixed guideway system of the steel-on-steel rail. However, we believe that the Draft EIS does not address several points of concern for us.

Firstly, integration of social and economic approach of resources, we believe that stronger community-planning objective should be described to create better and desirable living communities, such as they did in Portland, Salt Lake, and Sacramento. We believe that the Draft EIS focuses primarily heavily on just the transportation aspects of this system. We believe that the Draft EIS does not respond to Honolulu's

Primary Urban Center Development Planning, which mandates that guidelines to preserve the mauka-makai view corridors along major collector streets be preserved. We believe that the elevated structures along Nimitz include historic Chinatown and even going up into Manoa violates that policy. Mitigation of the negative impacts of our panoramic mountain and ocean waterfront views are not well explained or adequately illustrated. Other major cities such as San Francisco and Boston have removed such large similar structures on their waterfront, and even Seattle is considering and exploring ways of taking down their Alaskan viaduct.

Secondly, the AIA advocates creation of safe, healthy, and easily accessible environments for the transit passengers. We believe that the EIS has not described how to mitigate undesirable environments under the elevated guideway areas.

Third, the AIA promotes sustainable planning, design, and operation of transit systems. And we note that the Draft EIS says it will take over seven times the energy to construct the elevated guideway as compared to an at-grade system. We believe that the life cycle cost of

the comparison of the elevated system to an at-grade system should be explored. We are not convinced that the elevated system is the most cost effective (3-minute limit).

Lastly, the AIA urges the city to consider a more flexible rail technology, which will allow transit to be at grade, below grade, or above grade, as conditions require. Flexibility will allow us to be more easily adaptable --

HEARING OFFICER HAMAYASU: Please summarize.

SIDNEY CHAR: Thank you.

-oOo-

HEARING OFFICER HAMAYASU: Ralph Bruinsslot, followed by Herb Rothouse and Leslie Among.

RALPH BRUINSSLOT: I'm Ralph Bruinsslot, a licensed architect in Hawaii. I totally endorse what the AIA has put forth as their guidelines. I would like to share with and put on record my experience of living in San Francisco and working in San Francisco, and watching them build a raised highway along the waterfront, later to abandon it and tear it down. I actually worked with my window facing where they were part of the freeway that they were tearing down, and with the cost, it had to exceed three times the cost of putting it up. And that was because of the outrage of the citizens of San Francisco, to the visual damage that it did on the waterfront.

Now, they have replaced that with an on-grade transit system. They've developed that area very effectively, and the combination of ferries from the outside lined area coming in, I

watched it. I lived in Sonoma County and Marin County, and it started out 45 minutes, 35 miles, now it's two hours, if you can get there in two hours. So the mitigation they have taken is ferries, transit, and trying to move the transit system on up a hundred miles north of San Francisco. So it would be my encouragement to pay very close attention to the esthetics of installing above-grade transit system wherever possible, where it's feasible, it works, but when you're talking about downtown and areas that are very sensitive to structures, the backlash could be tremendous. Thank you.

-oOo-

HEARING OFFICER HAMAYASU: Next is Herb Rothouse, followed by Leslie Among, and Richard Ubersax.

HERB ROTHOUSE: Thank you. My name is Herb Rothouse, retired, and I live in Waikiki. The first speaker and the second speaker, I agree with, entirely, and I support their premise. I was against the rail from the very beginning, for several reasons. I won't go into all the reasons, but I will address two things. Number one, the cost. I compare to what happened in Washington, D.C. recently, where a visitor said, who was opened up to Congress, originally budgeted for 300-, end up costing almost 800 million. So I doubt very much the figures that we have been given, first 3 and a half billion for the rail, 4 billion for the rail, it would come no surprise to me if it ends up at 8 billion. I just cannot

trust government figures when it comes to estimates of projects, they've never been on the mark so far.

Secondly, great deal of money has been spent so far, many people here may realize already, close to $100 million, I understand from what I read in The Advertiser, has been spent on consultants and attorneys for this program. $100 million dollars. When I think of TheBus system, which certainly needs help, as the second speaker pointed out, if you look on Route 14, on Kapahulu, the bus runs one bus an hour. One an hour. On the 23 route, that runs one bus an hour. $100 million on consultants, and yet we have a bus system that runs one bus an hour? I mean, that's a disgrace. That's a disgrace, absolute disgrace.

You want to get people off the roads? Well, how are you going to get them off the roads, when you don't have adequate buses? You look at the TV in the morning shows H-1 highway, where are the buses? You could double, double the number of buses we have, with the money spent on consultants, bringing in the bus service to areas that get no service whatsoever, right now, and increasing where it's one an hour, make it three

an hour. You want people to give up, not use their cars? Well, provide proper bus service, frequently, available, and people will not use their cars like they do. That's all I have to say. Thank you.

-oOo-

HEARING OFFICER HAMAYASU: Next is Leslie Among, followed by Richard Ubersax and Chris Dolph.

LESLIE AMONG: Aloha and good evening. My name is Leslie Among. I'm with the Waikiki Neighborhood Board, District 9. Recently, our board has voted against the mass transit, but the election that people have spoken and most of the people showed that they want the mass transit. I ask, as a neighborhood board member, that we have a responsible EIS draft for the residents and the people of Waikiki. And as far as the route, it leads from Ala Moana, down towards McCully, down

Kapiolani and then it turns off to University Avenue, the residents in that district have come down and spoken to some of the members on our board, and fear that the space and infrastructures, that doesn't provide the room for the transit.

Recently, I proposed an idea on the board, with some of the engineers that came and were so gracious to come and address some of the issues of the transit, that the route be changed and be put alongside the Ala Wai Canal, as it snakes its way toward the golf course, to the Manoa and Palolo Streams. As it snakes it up that way, it will go all the way up to the U.H. campus, by Kalele Road, in back of where the U.H. baseball field is. This looks like a very responsible place to put up mass transit, in the light of issues such as eminent domain, litigations, and people being displaced by the project, some have opposed.

What I ask is a more responsible approach, and I do believe that the propose I told to my board and to the engineers that night, that a good route for the transit would be from Ala Moana, and to snake its way, up the Ala Wai Canal,

on the mauka side, and make its way up the Palolo Stream and the Manoa Stream. There will be less mishaps with eminent domain issues and people being misplaced, as I said, and I really feel that, you know, the inconvenience is on a lot of the people that are living there. I know some people feel like the inconvenience is on the project, on the other side, but I happen to feel that there should be a common ground where that would be a great route to take.

And to add another note to that, recently, Hard Rock Cafe has moved into Waikiki, so the Hard Rock property will be available maybe for a station on the gateway of Waikiki for the mass transit, or some stop or something, that property should be available (3-minute limit).

Thank you so much. In closing, I just would like to say, we're looking for a responsible approach to this EIS, and the capacity and the effects it will have on the people in our districts in Waikiki and there, on University Avenue, and McCully area and the U.H. Thank you so much.

-oOo-

HEARING OFFICER HAMAYASU: Okay. Richard Ubersax, followed by Chris Dolph and Steve Scott.

RICHARD UBERSAX: My name is Richard Ubersax. The purpose of the DEIS is to provide the City and County, the FTA, and the public with the information necessary to make an informed

decision, based on a full and open analysis of costs, benefits, and environmental impacts of the alternatives considered. However, it seems that in some respects, the DEIS is aimed at convincing the public and the FTA of the benefits of the Project, rather than inform the public completely.

One example is in the cost-effectiveness of the project. The FTA's cost-effectiveness index is a ratio formed by adding an alternative's annualized capital cost to its year 2030 operating and maintenance cost, and the total is divided by user benefits, in hour saves.

Any proposed New Starts project receiving less than a "Medium" cost-effectiveness index rating will not be recommended for funding by the FTA. The threshold between a rating of "Medium" and "Medium-Low" is $22.99 for user benefit expressed in dollars per hour of user benefit.

In the Alternatives Analysis, the cost-effectiveness index for the 20-mile alignment from East Kapolei to Ala Moana Center is stated as $21.34; and for the full project from West Kapolei to UH Manoa with an extension to Waikiki as $27.05. Thus, the 20-mile segment meets the threshold of $22.99, but the full project does

not.

City ordinance 07-001 recommended the North-South Road/Airport option as the preferred minimum operational segment for several reasons, one of which being that the cost-effectiveness index of $22.56 is below the FTA's threshold of $22.99.

Now, in the DEIS, the cost-effectiveness index has markedly improved to a point that is significantly below the FTA threshold of $22.99: $17.53 for the Salt Lake Alternative, $17.78 for the Airport Alternative, $22.86 for the combined Salt Lake/Airport Alternative. Information for the full project with extensions is conspicuously absent in the DEIS although it was available in the AA.

We know that the capital cost and operational and maintenance costs have not reduced, so that the only explanation is that the user benefits have increased significantly (3-minute limit).

In conclusion, this issue of user benefits and the exclusion and the conspicuous absence of including the three extensions in the overall analysis need to be scrutinized thoroughly

by the FTA. Thank you.

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HEARING OFFICER HAMAYASU: Chris Dolph, Steve

Scott, followed by Bryan Hoernig.

CHRIS DOLPH: Hi, my name is Chris Dolph from Waikiki. My concern is, basically, during this tough economic times, whether it's really wise for us to be spending so much money on a project, that it is the most expensive project the state has taken on. We already have in effect, HOV lanes, carpool lanes, contraflow lanes, and I was wondering what's the possibility of us using those also as toll lanes. Many people have had experience with toll lanes and how they alleviate traffic. This would generate money for the state instead of spending money. I'm concerned about how our tax will be used, and the people who would be utilizing the toll lanes are, well, I see them as being the people who need it; and the people who don't need it, would not have to pay for this expensive project.

I'm a total fan of what this fellow is suggesting here, increasing the buses, the bus routes, and I'd like to see some initiative in encouraging people to use the public transit, and I love that suggestion about making them free during these rush hour times. A previous testimony that I had heard was of one lady who was

speaking about she won't even be able to ride the transit unless she gets on the bus to get to the transit, and then get off the transit and ride another bus to the destination. Just staying on the bus the entire way would work. I think it's a great system. Even though I do have a car now, my wife and I chose to live for five years without a car, here in Honolulu, and TheBus system worked great for us. If it were improved, I could easily go back to living without a car. So that's it. Thank you.

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HEARING OFFICER HAMAYASU: Next is Steve Scott, followed by Bryan Hoernig, and Terry Conlan.

STEVE SCOTT: Hi, I'm Steve Scott, with Scott Hawaii. We have property on Kona Street. I have a couple points that, for me, are a concern. The first is, as the mass transit goes through Kakaako, it goes through a very dense area with regards to property, with regards to businesses, and it's going to impact, especially on Kona Street, almost every property from Queen Street all the way to Piikoi. My biggest concern there, is just the cost. Just in that one corner of Pensacola and Kona Street, you have approximately $25 million, which is, I understand it would be about one-quarter of the total land acquisition on one corner.

So my big problem is, all of the projections that the city had with regard to land acquisitions have to be totally inadequate. I've read in the EIS, that you have about 95 to $100 million allocated. How can you possibly spend on

one corner, $25 million?

The second concern I have, is with regards to the route, as it goes down Kona Street. In the EIS when it first came out, prior to the election, there was never any notification that this was not going to go past Ala Moana Center. Right now, that I just saw, there was an engineering drawing, only, that shows a third rail that's going to go over Nordstrom. The existing -- the initial construction was going to end, dead-end into Ala Moana Building, at 40 feet. Then they plan on putting a third rail, one line that is going to go over supposedly Nordstrom there. When that goes in, you're taking more property. The route is going to be wider and you're going to take more property than you need to, initially.

So why wasn't this in the alternatives analysis? Why wasn't this made known to the public? Basically, you're telling, by what you've put on the EIS, the Draft EIS, that you're not going to build past Ala Moana, because there's no way that you can build one rail, one line that goes over Ala Moana and that's going to serve the U.H. and Waikiki. This was never made known to

anyone prior to just a couple weeks ago, when the city came out with the Draft EIS, and even then, this drawing wasn't on that. So the city and Parsons & Brinckerhoff have been totally disingenuous with regards to making all this information available so that people can make an informed decision from vote prior to the general election in November. Thank you.

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HEARING OFFICER HAMAYASU: Bryan Hoernig, Terry Conlan, Amy Kimura.

BRYAN HOERNIG: Good evening. My name is Bryan Hoernig, and I also own a property on Kona Street. On Kona Street, like Mr. Scott says, is very dense and is displaying a lot of people. By condemning what I'm in now on a condemnation list, at this point, by just condemning my property, you're not just condemning my property. You're condemning by business, my livelihood, and that of my employees. I can only pray at this point, that you guys can reconsider how many people you are going to be displacing by this transit system.

I don't understand why we are put on late notice of this. I mean, it's just like coming

home tonight and saying, well, we got a note, here, and it says that we're not going to be able to own our property anymore, you're just going to be thrown out. And that's how I felt about it. I didn't get any notice, I didn't get anything. All I got was a letter that says I'm on a condemnation list. So I'm put on notice that I don't have a business anymore, I don't have -- you know, for my employees and everything else, and I think it's been handled very poorly. Thank you.

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HEARING OFFICER HAMAYASU: Terry Conlan, Amy Kimura, and Tom Heinrich.

TERRY CONLAN: Good evening. My name is Terrence Conlan, and I'm speaking as a private citizen. It's obvious that a lot of work has been done on this, so far. It's also obvious that there is tremendous amount of work yet to be done. One of the biggest criticisms I have of this study, is that it does not contain a defined measurable criteria for ultimately evaluating the success or failure of this project. It has a lot of general statements but nothing really measurable. So when we get to the end, we won't know if we made it or not.

I agree with Councilman Djou, that we need to start at either Salt Lake or the stadium, and come to town, so that we can begin generating revenue immediately, to help fund the rest of the system and begin to pay off the initial costs. If we start at Kapolei, it will be a long time before we get any money back.

I think we should use the Oahu rail line, which the state already owns, instead of trying to buy up new property. Everyone who lives along that corridor has always known that there was a rail right-of-way there, and their properties reflect that.

I do not believe that there are enough park-and-rides except in Kapolei, where there may be too many. If we want people to use this system, we have to provide park-and-rides that are convenient for them to drive their cars to the stations, in addition to those riding the bus.

I also question whether or not this rail system has any plans to allow people to bring luggage with them. If we're going to go to the airport and service the airport, then we have to provide for a way for them to transport their luggage; otherwise, it will do them no go.

Finally, I think that the EIS has a long ways to go. There are a lot of questions that haven't been answered, and a lot more work needs to go into that. Thank you.

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HEARING OFFICER HAMAYASU: Amy Kimura, Tom Heinrich, followed by Charles Carole.

AMY KIMURA: Good evening. I'm Amy Kimura. I testify tonight as an ordinary citizen who rides public transit wherever I've lived and traveled and who likes it, for the most part. I enjoyed commuting on the subways in New York City and Japan. As a traveler, I've ridden on trains and buses in Europe, Canada, and the United States. I list these because many people think everyone who is against the proposed Honolulu rail dislikes mass transit, rail in particular. On the

contrary, rail in the places that I've used them has been fast, convenient, efficient, and usually reasonably priced. But the populations served by them have been from two times to more than ten times Honolulu's population and could more easily support their operation and maintenance.

One place it was not so reasonably priced was Vancouver, Canada. The SkyTrain was clean, convenient, and efficient, but way more expensive than Honolulu's bus system. A monthly adult pass cost $73 to $136, depending on the number of zones covered. That's about two to three times the $40 cost here. What would that do to transit-dependent riders here, people with no auto?

In Vancouver, the monthly pass for seniors is $42, more than the yearly cost of $30 for seniors in Honolulu. What would that kind of cost do to seniors on limited and moderate incomes? For students, monthly passes in Vancouver are also $42, twice as much as the $20-a-month charged by TheBus.

Transit-dependent adult riders, the elderly and children will be greatly affected. Will the city be willing and able to greatly

increase its subsidy of transit to keep down the prices of the transit passes for them? If not, how will that affect the quality of life of seniors of moderate or limited means? How about families of low, moderate, and even middle incomes? If not, how will that attract motorists out of their cars and onto the fixed guideway? If yes, how will that affect property tax rates for everyone?

If commuter passes increase in price, the choice riders are TheBus, those who have an available vehicle to ride but choose to ride TheBus, will likely choose to abandon commuting on public transit in favor of their car, adding to congestion.

Mahalo for giving me this opportunity to comment. In the future, more notice would be appreciated (3-minute limit). I received this newsletter announcing this hearing three days ago, on Friday, December 5th. Thank you.

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HEARING OFFICER HAMAYASU: Tom Heinrich, followed by Charles Carole and Bobbie Slater.

TOM HEINRICH: Thank you, Mr. Hamayasu. My name is Tom Heinrich, and I'm chair of the Manoa Neighborhood Board, and I'd like to summarize several main points of discussion that both our

neighborhood board, as well as the McCully/Moilili Neighborhood Board have engaged in for some time. I note especially that while the Ala Moana Center to University of Hawaii at Manoa area would be a Phase 2 or subsequent development, this is a time to address these, of course, in the Draft EIS.

Generally speaking, first, of course, is the effect on University Avenue, particularly by what I'll just call an overhead viaduct. There are other alternatives that do need to be looked at. If that general route is continued to be considered from Ala Moana Center to the university, whether it's Eisenberg or Coolidge Streets, or even going as far as Market City, to use Market City as a different node and a route of connection to the University of Hawaii at Manoa campus.

A major concern as well, is, what should be a unified element of transportation and architecture may become, in fact, again, a most divisive element, as H-1 has served in the 3M, McCully/Moilili/Manoa area.

Secondly, is, of course, great concern over what I'll call the Varsity station near Puck's Alley, and I especially hold that architect

Scott Wilson and others will provide illustrations of what that station at this time would look like, even outside of the context of transit-oriented development.

Thirdly, is the absolute necessity of coordinating with the existing Primary Urban Center Development Plan, as well as the other T.O.D. initiatives, both in looking at potential other routes, as I mentioned a moment ago, but also in coordination with the land owners, particularly Kamehameha Schools and the University of Hawaii.

Another main point is that we absolutely have to work with coordination opportunities with the State Department of Transportation concerning the H-1 Freeway and University Avenue interchange area. This is a critical area in which other grade changes. In order to facilitate pedestrian, bicycle, and auto movements in addition to the potential of having rail transit, need to be coordinated, especially in order to avoid a so-called fly-over far above the H-1 Freeway itself (3-minute limit).

And lastly, the main point that many have brought up, is that if the project in fact is

built, that it must end up directly serving the UH-Manoa campus and not stop short, makai of H-1, but connect to at least to Dole Street and the Quarry parking structure area. Thank you.

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HEARING OFFICER HAMAYASU: Charles Carole,

Bobbie Slater, Philip Blackman.

CHARLES CAROLE: Charles Carole. I'm speaking as a private citizen. The DEIS does not present the impacts of the future bus routes and also the number of buses on these routes between Kalihi and Kahala.

Second, the EIS uses the DBEDT 2030 population series, which is much higher than the DBEDT's 2035 population, issued in January of 2008. For example, in 2010, the population projection, based on the 2030 series, is 952,000. In the 2035, it's been reduced to 932,000, 20,000 less. Presently, the July 1st, '07 estimate by the U.S. Bureau of the Census is 905,000. This will have an effect both on the ridership and the cost. Also, our present economic situation, which we will have hyperinflation and devaluation of a dollar, is not taken into effect at all. This will also result in our tourism, people coming in, and also the use of the airport. I think a supplementary EIS should be prepared to answer our concerns. Thank you.

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HEARING OFFICER HAMAYASU: Bobbie Slater, Philip Blackman, followed by Scott Wilson.

Bobbie Slater, she's not here. Philip Blackman.

PHILIP BLACKMAN: Thank you. My name is Philip Blackman. I've participated in a number of the hearings at the City Council level regarding this, over the last several years. What I have not seen in the Environmental Impact Statement that I believe ought to be there, is a clear statement of what has not been studied and what is not necessary in the EIS, but that is being left to the City Council and to the state government to be considering during the construction and during the implementation.

As a specific example, I was told that there isn't attention given to the impact on the taxpayer for the federal system that will have to be put in place to take all the folks that might go on to the Navy base without cars, that's really the intention of bringing and justifying bringing the rail to the airport location. I'll have to come from across Nimitz, find a way that currently have been accommodated by having hundreds,

literally thousands of cars coming each day and finding their own place at Pearl Harbor. To replace that with a shuttle system is a major expense. Just because it can be put in a different budget category, doesn't mean it shouldn't be made visible to people that are ultimately paying it from their tax dollars.

Also, the FTA, I believe, requires the new system to accommodate the same demographic, the same kind of service that's being given by TheBus, which currently remains the bus services. 50 percent of the people on the bus don't have a driver's license. If that's the same percentage that's going to be attracted to the rail ridership to meet the best standards for approval by the FTA, we'll have a problem because it's not going to have but a 50 percent impact on any reduction and congestion.

Also, with the lack of an impact and congestion was made a larger issue, the mayor and the city emphasized transit-orient development. In speaking to the support staff outside, they say that's beyond the purview of the EIS, yet something that was so well bound with the whole idea of we should have it, it was almost like take

this piece of candy and call it transit-oriented development, realize that it could not occur without the rail, and now we're told that it's not something that is being considered (3-minute limit) as its various impacts by the EIS.

So what's not in here, I'm asking to be at least listed very clearly for our policy makers, for our City Council, so they can recognize that it's being pushed on to them and not part of the EIS. Thank you.

HEARING OFFICER HAMAYASU: Thank you.

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HEARING OFFICER HAMAYASU: Scott Wilson. James McManus, followed by Mike Uechi.

SCOTT WILSON: Good evening. My name is Scott Wilson. I am an architect and planner in private practice. I have two comments regarding this DEIS. First of all, the overall project is supposedly being evaluated, and it should include the segments to the University of Hawaii in Manoa and to the Diamond Head end of Waikiki, since these are part of the system. The environmental impact of these segments on their respected neighborhood is not addressed at all, in the DEIS. For example, I want to show you a simulation that was done by Urban Advantage, of Berkeley. This is a vendor that has been hired in the past by the city, to do simulations of our urban city. This is of the King and University station. There's obviously an enormous impact on the neighborhood, with this proposed system, yet it is not covered

at all by the DEIS.

I would urge that the Environmental Impact Statement should cover all impacts of the system in its completed form, and it is not sufficient to start the project with a partial EIS. For this reason, I would say that this document is incomplete and should be rejected at this time. It should be returned to its authors, with the instructions to include impacts caused by all project segments.

Second comment. Section 4.7.3 is entitled "Environmental Consequences and Mitigation." This section consists of a number of photo simulations and a table of visual effects. There is no mention of the actual ground level environment, which will result, by necessity, from the imposition of a 30-to-50-foot-wide swathe of concrete overhead. As we all know, the environment under a freeway overpass or off-ramp is a degraded one, always in shadow, noisy, dirty, blighted. I would submit that this DEIS is incomplete, on the grounds that it does not contain adequate analysis of the ground level environment which will be created by this project. Thank you.

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HEARING OFFICER HAMAYASU: James McManus, Mike Uechi, and Michelle Matson.

JAMES McMANUS: My name is James McManus. Good evening, everybody. I moved here in January of 1989, and I've been looking to help induce rail to be brought to Honolulu, because Honolulu is a very beautiful, blessed place. And I use the transit system and the bus system, which is very good. And lot of people have a fear about the bus system being hurt. It's not. The bus system would be complemented by the rail. And I really feel that the rail should go forward here.

I know by listening here tonight, there's a lot of impact problems with property owners and

businesses. But just like any other community, and I come from New York, I know a lot of business people that were put out, because we have in the federal level, what they call right-of-way. And, you know, that's what happens as progress goes on. And since I've been here, I've seen where the City Council at one time, because of Renee Mancho, our transit money went to Oregon, and they have a rail system up and running on our money that we could have had. And Abercrombie went way out of his way to get it, now he's done it again, and I don't think we should blow this one, because Honolulu is going to need it, and it needs it now.

Because all you need is one accident on the Long Island expressway -- excuse me, that's where I used to live -- and it becomes a parking lot. And you're going to have that on the H-1. And even in the local streets, like Ward Avenue, I never saw so much traffic. And, you know, it's building up so big and to the point where it's going to choke itself. And mass transit is an asset to this community, if it takes it. But it has to do the right thing to the people that live here, and this is the people who try to help as many people as it can to make it work, because

some people are going to get hurt, unfortunately. But that's transit. It goes in every community across the country, and I really feel Honolulu, the time is now, you have to do it, because in the last debate they had about the last thing with the transit, the students in University of Hawaii were begging to please start it at the university and work out, but they were denied in that.

Now (3-minute limit), I just say to the committee here, that, please, try and make it work, because if it fails this time, Honolulu is in for a real problem of traffic. Thank you. I appreciate it.

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HEARING OFFICER HAMAYASU: Mike Uechi, Michelle Matson, Katherine Kupukaa.

MIKE UECHI: Thank you very much. My name is Mike Uechi, I'm a practicing physician. Yesterday, I was pleased to read the Honolulu Rail Transit, the street pamphlet that was passed out in the newspaper, and the first thing they addressed was, how does rail transit help reduce traffic congestion. So it says here, that by 2030, an addition of 750,000 more daily trips are expected on Oahu's roads. That impacts H-1

because I believe in 2030, we're going to be over capacity by 81 percent.

But the thing that blew me away, was the fact that they announced that rail will reduce traffic by 11 percent. So just my simple math, we were over capacity by 81 percent, and you reduce it by 11 percent. So when you're stuck in traffic, by 81 percent and you reduce it by 11 percent, and paying $6 billion and you're still stuck in traffic, that's a significant problem, so my question is, what happens in 2030, when the people in the Leeward corridor and also the Central Oahu corridor are still stuck in traffic, except worse in 2030. So we need to be addressing the problem right now, before the situation happens.

The second thing about this Honolulu rail is, how do we expect to pay for it? From what I understand, we don't have a penny yet from the federal government, and the first penny is going to arrive in 2011, which is three years from now. So when you say we got guaranteed 925 million in the kitty, and we don't have a penny right now, what happens when that money is no longer present? Who is going to guarantee that we're going to have

anywhere close to 1.2 billion that you expect?

Secondly, since we are in a recession right now, what happens when we don't have the revenues that are backup of excise tax? What happens when both of these source of revenues don't pan out? I'm going to ask the question, what happens, then, when we cannot afford to pay it? The only source of revenue we have right now is property taxes, and if we don't have income, that's where we're going to have more trouble. Thank you very much.

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HEARING OFFICER HAMAYASU: Michelle Matson, Katherine Kupukaa, and Bart Travaglio.

MICHELLE MATSON: Good evening. My name is Michelle Matson, and I guess you could say I have a family interest in a historic property deeded to the state, in trust, in care of the public trust, along the proposed route of this vehement blight.

One of the most significant adverse impacts of the proposed elevated steel-on-steel heavy rail system is the irreparable blight, it will implant through the vital heart of downtown Honolulu, the Waterfront and beyond. This obtrusive blight will impact four protected registered historic sites along the proposed Waterfront route, specifically Aloha Tower, Irwin Park, the Dillingham Transportation Building, and Mother Waldron Park.

Because of the city's requirement for federal funding for the proposed elevated rail project, there must be compliance with Section 106 of the National Historic Preservation Act and Section 4(f) of the Department of Transportation Act. It will therefore be taken into account that such elevated infrastructure blight would be, quote, visually incompatible and block the view of the historic resource; that is, the scale of the infrastructure would overwhelm the resource's historic appearance, and would cause the loss of integrity of setting, feeling and association of these historic sites. The historic view planes to the harbor from Bishop Street and the Chinatown Historic District will be similarly impacted.

It would therefore be a fatal mistake for Honolulu's future if the city forces the intrusion of elevated transit blight on the Honolulu Waterfront and the mauka-makai harbor views. If the Downtown Honolulu Waterfront is allowed to be impacted by the fatal mistake of elevated guideway structure, the vital visual, and indeed historic, character and integrity of the waterfront centerpiece of downtown and the harbor entrance to Honolulu will be lost. One only needs to consider the blight created by the Embarcadero Freeway along the San Francisco Waterfront, and the universal public elation when it was torn down. It is time that the City and County of Honolulu learns by the mistakes of others before it is too late.

The city also proposes to slam the elevated heavy rail route through Kaka`ako adjacent to another registered historic site, Mother Waldron Park on Halekauwila Street, diminishing its historic character and integrity, and usefulness and attraction as a vital recreational open space for today's growing population. The revised Kaka`ako Mauka master plan designates Halekauwila Street and its

extension to Kamake`e Street as a significant promenade street, a pedestrian-friendly boulevard with wide tree-lined sidewalks and new human-scale residential neighborhood (3-minute limit).

In conclusion, there are very serious public concerns surrounding the city's disregard and neglect of the significant adverse impacts of an elevated transit route along the Honolulu Waterfront specific to the historic sites. This badly planned project cannot be allowed to overshadow and overpower these significant historic sites or destroy the visual character and integrity of the vital Downtown Waterfront. Thank you.

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HEARING OFFICER HAMAYASU: Katherine Kupukaa,

Bart Travaglio, followed by Kevin Killeen.

KATHERINE KUPUKAA: Good evening. I'm Katherine Kupukaa, and my choice is to don't build, only because the most viable alternative was HOT lanes, and that was eliminated in the alternative analysis. I guess the authors of the Environmental Impact Statement didn't realize how Kamehameha Highway is the only highway from Central and Leeward Oahu, other than the freeway, and during peak hours, the three lanes going westbound in the afternoon is just jam packed, also buses going, taking the right-hand lane, so I can't see you would remove two lanes in the medial, to make way for this train track.

What citizens are frustrated and complaining about, is the congestion, and this will not eliminate the traffic congestion that is, you know, currently going on, on the H-1 Freeway. And for the past couple months I've been catching the bus, but you can't -- the bus -- for instance, today, I caught the bus from Mililani, and the bus was half an hour late, so we had to get off the bus on Alapai Street and catch another bus, and so I was supposed to be here by six o'clock. And so my frustration is that, in Mililani, I have to

walk half a mile to the bus stop. If I were to catch the train, I would catch the No. 52 and go all the way to Leeward Community College to catch a train. I don't think you people who don't catch the bus realize that you have to wait half an hour here, half an hour there. Like today, I caught the bus in the morning and I could accomplish only two of my errands, but I just have to go home because I had to be here tonight to testify.

There are other concerns that I have, and I brought this up at the last transit meeting, and till this date, it was never answered. I posed the question of the bus ridership from Leeward Oahu to Ala Moana Shopping Center (3-minute limit), because why are we building this train if there aren't -- there's not going to be the ridership going from Leeward and Central Oahu to Ala Moana Shopping Center, and even to the University of Hawaii. This is my concern anyway. Thank you.

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HEARING OFFICER HAMAYASU: Bart Travaglio, followed by Kevin Killeen and Gary O'Donnell.

BART TRAVAGLIO: Good evening. My name is Bart Travaglio, and I've been very fortunate to be employed with the travel business here in Hawaii for the last 35 years. I spent a lot of time on motor coaches. I don't think enough service has been given to a bus service, an adequate bus service and one that runs efficiently.

I'd like to pose this question to you: How many of you people have come here tonight on the bus? That person, how many will ride the train?

On this island, people don't ride trains. I spend on a bus with 50 people. I apologize for the exhaust, but our perfect footprint, individually, is rather small. But, I look at the road, on the freeway during the middle of the peak hours. One person in a car. One person in a car. I travel the other way, two people in the HOV lane.

You want an answer to your system, try

making the bus more efficient. It will be much more economical. The new buses they could bring in, don't make them like the city buses. Put them like the passenger buses that I take to work. Fifty seats, comfortable. You get on the bus, you could do work on the way into our office, and you go home. Problem is, people don't just go to their office. From their office, they go here, they go there, they go here, they go there, they do it on the way in, they do it on the way out. They're going to be doing the same, when you spend a billion dollars on a train.

It's not in the mind of the people here to take it, but if you make it convenient, it could work. If you put 50 buses more out there, that whole 50 people, and you put the buses in the HOV lane with 50 people on them instead of two, it could work. If you make your system designed so the timing is as effective as it is in Switzerland, people will know the buses are going to be here. And for the other people that said this, and it's just the frustration, buses will work, and you gotta give 'em a chance. And when you bring the new buses in, you power them with propane. There's tons of it, and it's cheap.

Your cost of your train, electric, how are you going to produce the electric? Our best hope for something like that, is to get one of the retired nuclear subs, put them in Pearl Harbor and furnish the electricity for this site. That's actually our best hope. Okay? But, otherwise, you gotta make the electricity to power the train (3-minute limit). Thank you, ladies and gentlemen. I appreciate your listening.

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HEARING OFFICER HAMAYASU: Kevin Killeen, followed by Gary O'Donnell.

KEVIN KILLEEN: Hi. My name is Kevin Killeen, and I agree with guys who say there's no best service. Improve the first-rate bus service. I'm also concerned about the propaganda that's used, the claim that the traffic will be reduced, future congestion. Because the media is a little bit lazy, they reprint stuff like that a couple days before the election, and I think people should realize traffic is going to be a lot worse.

And the other propaganda claiming that the Sierra Club endorses the train, that might be true that they had a national report, but the local Sierra Club said they support it if certain conditions are met. They wanted the at-grade level. They wanted downtown service, U.H. service

first, and they wanted it done in light rail, not heavy rail. So I believe the executive board of the Sierra Club notified DTS that they don't have a position of supporting the rail. And I see that they're still implying that in these brochures that they're handing out, so, I don't blame DTS. That's the contractors that you have, working for you. But I'd appreciate it if they made it clear that traffic is going to be worse with the rail, and that Sierra Club did not endorse the rail. Thank you.

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HEARING OFFICER HAMAYASU: Gary O'Donnell.

GARY O'DONNELL: Aloha. I'm Gary O'Donnell. I have a master's in urban design from Pratt Institute, and I have lived and worked in Honolulu since 1985. Overall, I support the system and I thank you for your work on the EIS. However, I would support a different system over the route chosen, such as Vineyard Boulevard. This would help address some of the issues with going past historic sites, and the downtown area, and Chinatown, and it would also alleviate some of the issues of the visual impact along the Waterfront.

I think there should be a secondary system, on-grade, that will take people with more stops in the inner cities, such as on Hotel

Street. And since we are a tourist destination and we get a large part of economy from tourism, we should have it go to the airport first, rather than Salt Lake, and I would prefer that we start this system in the downtown area.

I understand one of the problems is getting 40 acres of land near the downtown area, where the construction lay-down area. I would suggest taking a look at Shafter Flats, if you haven't done so already, or possibly swapping out the park along Lagoon Drive there, as you approach, come out under the viaduct on Nimitz.

Basically, we're not going to have enough room to put all the cars on the road in 50 years from now. Population keeps growing, the way it has in the of the last 50 years. And the cost, the $4 billion, when I hear about the hundreds of billions of dollars being spent in Washington, D.C., it's really a small amount, even if it went to $8 billion, I would still support the rail, and thank you very much. I appreciate your time and your effort on this.

-oOo-

HEARING OFFICER HAMAYASU: Thank you. That's the end of the registered speakers. Is anyone else present who would like to provide a comment on the project issues?

If you haven't signed in to present your testimony, then please state your full name and address, for the record. Anyone else? I'm sorry, you already -- yes, of course, please. You wish to testify?

RICHARD KAWANO: Yes.

HEARING OFFICER HAMAYASU: Please step to the mike. Name and address, please, for the record.

RICHARD KAWANO: Richard Kawano, and my address is 1420 Victoria Street, 803. I'd like to speak in support of the project. I've lived here since '64. I have concerns. I've listened to the people who have concerns about the cost, but I voted for it during the election, as the majority of us did, and I do believe it's necessary, it's not a magic bullet, I know it's not going to solve all the problems, but with the traffic congestion, with the population that's going to be going on, we need to give the people a fair alternative. And President-elect Obama is talking about large infrastructure problems and you gotta look at it from the economic point of view. You know, less tourists are coming here, we're going to be impacted by that, and they're talking nationally about major infrastructure improvements across the country, and as an economic stimulus for a lot of these areas that are being severely impacted by unemployment and those things there, so it will be -- I think it's going to be good for the economy. I think it will have a positive impact on transit time for people who have to come in from Kapolei, all those houses out there.

I live right here in town. I'll never be

using it, but I still think, as a community, we need to support this thing, not just -- and then we've built H-3. So I do strongly support the project, and I hope it gets started. The sooner we get this started, the less expensive it will be for all us taxpayers. And, finally, this needs to be done with excellent management. This project needs to come in on time and on budget, you know, in the worst-case scenario, if it takes significantly longer and if it ends up double or triple, like H-3 did. So the opponents have to be listened to, and their concerns have to be addressed. Thank you very much.

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HEARING OFFICER HAMAYASU: I'll call for more testimony, not previously testified people, but any who haven't done? Yes, please step up.

Please, your name and address, for the record.

EVE ANDERSON: Good evening. I'm Eve Anderson. My address is P.O. Box 25550, Honolulu, 96825. I'm concerned that the public, general public that's concerned about this project hasn't

had time and will not have time to read the document. I just picked up one tonight. I'm wondering if there is a possibility for you to push the deadline out to, let's say, February 7th? Let everybody get through the Christmas holidays and New year's and things.

And I'd really like to have you, as our expert, to go on T.V. and talk about the document. You can do maybe five presentations, take them section by section so more people can understand it, 'cause there ain't gonna be very many people in the general community that will get a document, or go to the library, or sit in front of a computer for 400-and-some pages worth. I know during the earlier times, you had a lot of ads on T.V. and radio, and doing all this to inform the people, so I think it would be very time and money well spent if you or somebody who designate an expert to discuss this document that's huge, so that's my concern.

-oOo-

HEARING OFFICER HAMAYASU: Anybody else wish to testify?

With nobody else interested is providing the testimony or comments, I conclude this hearing.

Go ahead.

ROBERT CRONE: My name is Robert Crone. My

address is 218 Kuupua Street, in Kailua. First, I want to say that I support the position of the American Institute of Architects. I think in addition to the oral testimony given, there are some very good information in their written testimony that we should take heed of. The point that I would like to bring out today, is that Honolulu, according to the U.S. Census, is the 52nd largest city in the United States, as far as metropolitan population, and 47th largest city with relationship to its urban population. Unlike some literature that was put out in relation to the transit, there are no cities smaller than Honolulu that built rail transit systems. All the cities are larger than Honolulu.

The third rail systems, like we're contemplating here, which does not allow at-grade, have been built by maybe cities in the top 12 cities in the country. All the cities between that point and where we are down in No. 50, have built light rail systems. They built systems that have overhead wires rather than the third rail, which allows them to be overhead at-grade or underground. And they've all put them primarily at-grade, with some places overhead or underground

or they needed to, in order to pass freeways and things like that.

I think it's physically and totally irresponsible for us to think that, as the 52nd largest city in the country, our population can afford to support a system of this kind, of a grade separated system and the extra expense. The at-grade system is much more economical and why it's been chosen by approximately 20 cities, between the 12th largest and the 50th largest.

I think that regarding the construction, regarding the operation of it, and regarding the maintenance of it, these are going to be financial burdens that our community is going to have for many, many years, and we are burdening ourselves, our children and our grandchildren with this thing, and I think that in the future, it would just always be seen as something that, financially, bankrupt has been noted. Thank you.

HEARING OFFICER HAMAYASU: Anyone else wish to testify?

With nobody else interested in providing comment, I conclude this hearing at 7:29. Thank you for your time and interest in the project.

-oOo-

STATE OF HAWAII)
) ss.
COUNTY OF HONOLULU)

I, Elsie Terada, Certified Shorthand

Reporter, Certificate No. 437, for the State of Hawaii, hereby certify:

I am the person that stenographically recorded the proceedings.

The foregoing transcript is a true record of said proceedings.

Dated this 26th day of December, 2008, in Honolulu, Hawaii.

_____

ELSIE TERADA, CSR NO. 437
Notary Public, State of Hawaii

My Commission Expires: 4-07-2010

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-332489

Mr. Fred Abe
855 Makahiki Way, #301
Honolulu, Hawaii 96826

Dear Mr. Abe:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

Your comments regarding the Project are noted. However, alternatives that relied only on bus transit were evaluated during the Alternatives Analysis phase and shown to be less effective than the Fixed Guideway Transit Alternative. Chapter 2 of the Final EIS summarizes those findings.

As described in Section 2.2.2 of the Final EIS, enhanced bus service with a fleet of 765 buses was considered as part of the Transportation System Management (TSM) Alternative during the Alternatives Analysis process. It was documented throughout the Alternatives Analysis Report (2006b) and rejected because it would have provided little transit benefit, albeit for little cost. The type of bus used would not affect the overall findings. To serve the higher

level of transit use in the study corridor, the higher-capacity fixed guideway alternative was determined to be more cost-effective. Other areas of Oahu outside the study corridor are proposed to be served with improved bus service.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

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MUFI HANNEMANN
MAYOR

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DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-332490

Mr. John Kato
910 Pumehana Street
Apartment G
Honolulu, Hawaii 96826

Dear Mr. Kato:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraph addresses your comments regarding the above-referenced submittal:

Your preference for a Fixed Guideway Transit Alternative has been noted. While each of the alternatives discussed in the Draft EIS includes trade-offs between benefits and impacts, the Airport Alternative from East Kapolei to Ala Moana has been selected as the Preferred Alternative as described above. As compared to the alternatives discussed in the Draft EIS, the Airport Alternative will carry the most passengers, provide the greatest transit-user benefits, and result in the fewest vehicle hours of delay. It will provide access to employment centers at Pearl Harbor Naval Base and Honolulu International Airport and will serve the Salt Lake neighborhood with connecting bus service. Of the three Build Alternatives addressed in the Draft EIS, the Airport Alternative will have slightly less impacts to the natural and built environment analyzed in the Draft EIS. During the public comment period on the Draft EIS, the public overwhelmingly supported the Airport Alternative. Of the comments that specifically supported one of the alternatives, more than 75 percent were in support of the Airport Alternative. For more

information this selection is discussed in Section 2.4 of the Final EIS. Since publication of the Draft EIS, design has been advanced, further analysis has been completed, and information has been added in response to comments on the Draft EIS and agency coordination. The Final EIS discusses the process that was used to select the Preferred Alternative, how comments were considered in the decision-making process, impacts and mitigation commitments.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

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MUFI HANNEMANN
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SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT10/09-336966

Mr. Sidney Char
American Institute of Architects
Honolulu Chapter
119 Merchant Street, Suite 402
Honolulu, Hawaii 96813

Dear Mr. Char:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

The island's unique visual character and scenic beauty was considered in the visual and aesthetic assessment presented in the Draft and Final EISs. It is acknowledged that the guideway and stations will noticeably contrast with Chinatown's historic character. In addition, views in Downtown and the other areas, including protected mauka-makai views, will be blocked and some views will change, resulting in substantial visual effects. Section 4.8 of the Final EIS further assesses protected mauka-makai views from what was presented in the Draft EIS (see Tables 4-10 through 4-14 and Figures 4-39 through 4-50). The assessment acknowledges that some view obstructions and changes to views will be unavoidable and substantial. They will be most noticeable where the guideway and stations are nearby or in the foreground of views. This includes views for those who travel near the alignment. The degree of visual effect will

vary with the alignment orientation, guideway and station height, and height of surrounding buildings and trees, along with the viewer's expectations of view quality. It is also noted that the Project will conflict with Revised Ordinance of Honolulu (ROH) Section 24-1.4 where project elements, such as the guideway, will block protected mauka-makai view corridors. View changes are not likely to be obtrusive in wider vistas or regional panoramic views where the project elements serve as smaller components of the larger landscape. Section 4.8.3 of the Final EIS includes more detail on measures to minimize negative visual effects.

The Project will have a positive effect on community, social, economic, and natural resources in a number of ways. With a net reduction of more than 40,000 cars a day taken off Oahu's crowded highways by 2030, the Project will provide a transportation benefit to the community as a whole—even to those who never use the system. The high-quality transit access will serve major transit-dependent communities in Honolulu linking jobs with affordable housing and will help focus future growth into existing and planned urban areas. The City is working with communities to plan the areas around stations to attract high quality mixed-use development that will create opportunities for affordable housing and accessible jobs in an environment well suited to walking, bicycling, and transit use. This will expand economic and social opportunities to those without access to a car and allow families to save money otherwise budgeted for transportation.

The Project has logical termini at East Kapolei and Ala Moana Center and independent utility from any extensions that may be constructed in the future. The future extensions to West Kapolei, Salt Lake Boulevard, Waikiki, and UH Manoa are discussed in the cumulative impacts sections of Chapters 3 and 4 of the Final EIS. However, the future extensions are not part of this Project, thus, they are not required to be evaluated under Chapter 343 of the Hawaii Revised Statutes NEPA. Under NEPA, environmental analysis is only required when there is a proposed action by a Federal agency. Here, because the future extensions are not proposed for implementation at this time, they are not part of the Project studied in the Final EIS. It would be premature to undertake an environmental analysis of the extensions (beyond the cumulative impacts analysis) because they are not part of the proposed action to be taken by the City and FTA. If the extensions are proposed for implementation in the future, environmental analysis of the extensions and appropriate alternatives will be undertaken at that time.

In response to your second comment, as discussed in the Final EIS Section 2.5.4 Safety and Security Measures, a project-specific Safety and Security Management Plan has been developed in accordance with FTA requirements to define the safety and security activities and methods for identifying, evaluating, and resolving potential safety hazards and security vulnerabilities of the system. It establishes responsibility and accountability for safety and security during the Preliminary Engineering, Final Design, construction, testing, and start-up phases of the Project. The Honolulu Police Department, the Honolulu Fire Department, the Honolulu Department of Emergency Management, and the Honolulu Emergency Services Department have been involved in preparing and will be part of implementing the plan. The plan addresses public safety and security concerns, including threats and hazards associated with the Project, specific issues that were identified through community outreach efforts, and design and architectural details to enhance safety.

The Alternatives Screening Memorandum (DTS 2006a) recognized the visually sensitive areas in Kakaako and Downtown Honolulu, including the Chinatown, Hawaii Capital, and Thomas Square/Honolulu Academy of Arts Special District. To minimize impacts on historic resources, visual aesthetics, and surface traffic, the screening process considered 15 combinations of tunnel, at-grade, or elevated alignments between Iwilei and Ward Avenue. Five different alignments through Downtown Honolulu were advanced for further analysis in the Alternatives Analysis, including an at-grade portion along Hotel Street, a tunnel under King Street, and elevated guideways along Nimitz Highway and Queen Street (Figure 2-4).

The Alternatives Analysis Report (DTS 2006b) evaluated the alignment alternatives based on transportation and overall benefits, environmental and social impacts, and cost considerations. The report found that an at-grade alignment along Hotel Street would require the acquisition of more parcels and could potentially affect more burial sites than any of the other alternatives considered. The alignment with at-grade operation Downtown and a tunnel under King Street, was not selected because of the environmental effects, such as impacts to cultural resources, reduction of street capacity, and property acquisition requirements of the at-grade and tunnel sections, which would cost an additional $300 million.

The Project's purpose is "to provide high-capacity rapid transit" in the congested east-west travel corridor (see Section 1.7 of the Final EIS). The need for the Project includes improving corridor transit mobility and reliability. The at-grade alignment would not meet the Project's Purpose and Need because it could not satisfy the mobility and reliability objectives of the Project (see bullets below). Some of the technical considerations associated with an at-grade versus elevated alignment through Downtown Honolulu include the following:

- ***System Capacity, Speed, and Reliability***—*The short, 200-foot (or less) blocks in Downtown Honolulu would permanently limit the system to two-car trains to prevent stopped trains from blocking vehicular traffic on cross-streets. Under ideal operational circumstances, the capacity of an at-grade system could reach 4,000 passengers per hour per direction, assuming optimistic five minute headways. Based on travel forecasts, the Project should support approximately 8,000 passengers in the peak hour by 2030. Moreover, the Project can be readily expanded to carry over 25,000 in each direction by reducing the interval between trains (headway) to 90 seconds during the peak period. To reach a comparable system capacity, speed, and reliability, an at-grade alignment would require a fenced, segregated right-of-way that would eliminate all obstacles to the train's passage, such as vehicular, pedestrian, or bicycle crossings. Even with transit signal priority, the at-grade speeds would be slower and less reliable than an elevated guideway. An at-grade system would travel at slower speeds due to the shorter blocks, tight and short radius curves in places within the constrained and congested Downtown street network, the need to obey traffic regulations (e.g., traffic signals), and potential conflicts with other at-grade activity, including cars, bicyclists, and pedestrians. These effects mean longer travel times and far less reliability than a fully grade-separated system. None of these factors affects an elevated rail system. The elevated rail can travel at its own speed any time of the day regardless of weather, traffic, or the need to let cross traffic proceed at intersections.*

- ***Mixed-Traffic Conflicts***— *The Project will run at three minute headways. However, three-minute headways with an at-grade system would prevent effective coordination of traffic signals in the delicately balanced signal network in downtown Honolulu. A disruption of traffic signal cycle coordination every three minutes would severely affect traffic flow and capacity of cross-streets. Furthermore, there would be no option to increase the capacity of the at-grade rail system by reducing the headway to 90 seconds, which would only exacerbate the signalization problem. An at-grade system would require removal of two or more existing traffic lanes on affected streets. This effect is significant and would exacerbate congestion. Congestion would not be isolated to the streets that cross the at-grade alignment but, instead, would spread throughout Downtown. The Final EIS shows that the Project's impact on traffic will be isolated and minimal with the elevated rail, and, in fact will reduce system-wide traffic delay by 18 percent compared to the No Build Alternative (Table 3-14 in the Final EIS). The elevated guideway will require no removal of existing through travel lanes, while providing a reliable travel alternative. When traffic slows, or even stops due to congestion or incidents, the elevated rail transit will continue to operate without delay or interruption.*

  An at-grade light rail system with continuous tracks in-street would create major impediments to turning movements, many of which would have to be closed to eliminate a crash hazard. Even where turning movements are designed to be accommodated, at-grade systems experience potential collision problems. In addition, mixing at-grade fixed guideway vehicles with cars, bicyclists, and pedestrians presents a much higher potential for conflicts compared to grade-separated conditions. Where pedestrian and automobiles cross the tracks in the street network, particularly in areas of high activity (e.g., station areas or intersections), there is a risk of collisions involving trains that does not exist with an elevated system. There is evidence of crashes between trains and cars and trains and pedestrians on other at-grade systems throughout the country (e.g., Phoenix, Houston, LA). This potential would be high in the Chinatown and Downtown neighborhoods, where the number of pedestrians is high and the aging population presents a particular risk.

- ***Construction Impacts***—*Constructing an at-grade rail system could have more effects than an elevated system in a number of ways. The wider and continuous footprint of an at-grade rail system compared to an elevated rail system (which touches the ground only at discrete column foundations, power substations, and station accessways) increases the potential of utility conflicts and impacts to sensitive cultural resources. In addition, the extra roadway lanes utilized by an at-grade system would result in increased congestion or require that additional businesses or homes be taken to widen the roadway through Downtown. Additionally, the duration of short-term construction impacts to the community and environment with an at-grade system would be considerably greater than with an elevated system. Because of differing construction techniques, more lanes would need to be continuously closed for at-grade construction and the*

closures would last longer than with elevated construction. This would result in a greater disruption to business and residential access, prolonged exposure to construction noise, and traffic impacts.

Because it is not feasible for an at-grade system through Downtown to move passengers rapidly and reliably without significant detrimental effects on other transportation system elements (e.g., the highway and pedestrian systems, safety, reliability, etc.), an at-grade system would have a negative system-wide impact that would reduce ridership throughout the system. The at-grade system would not meet the Project's Purpose and Need and, therefore, does not require further analysis.

The resources and costs associated with construction and operation of an elevated system have been considered in project planning. As evaluated in the Alternatives Analysis, an underground system would be the least cost-effective option. An at-grade system in the Downtown area would not meet project requirements for rapid, safe, and reliable operations. The system will be constructed and operated in a sustainable manner using best practices and will result in a reduction in total energy demand on the island.

In response to your final comment, the Project's chosen technology ensures speed, reliability, and efficiency and is the only one that allows an automated, driverless system. As such, it will have a lower operating cost and attract the highest ridership of all technologies examined. As discussed previously, at-grade operation would require a fenced right-of-way with no crossings, which is not possible to construct in the Downtown area.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-332493

Mr. Ralph Bruinsslot, AIA
P.O. Box 4151
Honolulu, Hawaii 96812

Dear Mr. Bruinsslot:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

The Alternatives Screening Memorandum (DTS 2006a) recognized the visually sensitive areas in Kakaako and Downtown Honolulu, including the Chinatown, Hawaii Capital, and Thomas Square/Academy of Arts Special Design Districts. To minimize impacts on historic resources, visual aesthetics, and surface traffic, the screening process considered 15 different combinations of tunnel, at-grade, or elevated alignments between Iwilei and Ward Avenue. As identified on pages 4-23 and 4-24 of the Screening Memorandum, four different alignments through Downtown Honolulu were advanced for further analysis, including an at-grade portion along Hotel Street, a tunnel under King Street, and elevated guideways along Nimitz Highway and Queen Street.

The Alternatives Analysis Report (DTS 2006b) evaluated the alignment alternatives based on transportation and overall benefits, environmental and social impacts, and cost considerations. The report found that an at-grade alignment along Hotel Street would require

the acquisition of more parcels and affect more burials than any of the other alternatives considered. The alignment with a tunnel under King Street through Downtown, in addition to the environmental effects such as impacts to cultural resources, reduction of street capacity, and property acquisition requirements of the at-grade section, would cost over $500 million more than the least expensive alternative.

The Project's purpose is "to provide high-capacity rapid transit" in the congested east-west travel corridor. The need for the Project includes improving corridor mobility and reliability. The at-grade alignment would not meet the Project's Purpose and Need because it could not satisfy the mobility and reliability objectives of the Project. Some of the technical considerations associated with an at-grade versus elevated alignment through Downtown Honolulu include the following:

- ***System Capacity, Speed, and Reliability**: The short, 200-foot blocks (or less) in Downtown Honolulu would permanently limit the system to two-car trains to prevent stopped trains from blocking vehicular traffic on cross-streets. Even with transit signal priority, the at-grade speeds would be slower and less reliable than an elevated guideway. Under ideal circumstances, the capacity of an at-grade system could reach 4,000 passengers per hour per direction, assuming optimistic 5 minute headways. Based on travel forecasts, the Project will need to carry approximately 8,000 passengers by 2030. Moreover, the system can be readily expanded to carry over 25,000 in each direction by reducing the interval between trains (headway) to 90 seconds during the peak period. To preserve a comparable system capacity, speed, and reliability, an at-grade alignment would require a fenced, segregated right-of-way that would eliminate all obstacles to the train's passage, such as vehicular, pedestrian, or bicycle crossings.*

- ***Mixed-Traffic Conflicts**: With the planned three-minute headways, the short cycle of traffic lights would affect traffic flow and capacity of cross-streets. Furthermore, there would be no option to increase the capacity of the system by reducing the headway to 90 seconds.*

- ***Construction Impacts**: An at-grade system would consume two or more lanes of existing roadway, resulting in increased congestion or requiring that additional businesses or homes be taken to widen the roadway through Downtown. This would also have greater construction impacts and potentially affect cultural practices and burials to a greater extent than the placement of discrete column foundations for an elevated structure.*

Because it is not feasible for an at-grade system through Downtown to move passengers rapidly and reliably without significant detrimental effects on other transportation system elements (e.g., the highway and pedestrian systems, safety, reliability, etc.), an at-grade system would have a negative system-wide impact that would reduce ridership throughout the system. The at-grade system would not meet the Project's Purpose and Need and, therefore, does not require additional analysis.

The visual setting for the Project was considered in the visual and aesthetic analysis presented in the Draft and Final EISs. Several additional simulations and analysis of impacts

based on public comments received during the Draft EIS public comment period have been added to Section 4.8 of the Final EIS. It is acknowledged in both the Draft and Final EISs that some views Downtown will be blocked and some views will change substantially. Overall, the Project will be set in an urban context where visual change is expected and differences in scales of structures are typical. As stated in Section 4.8.3 of the Final EIS, the measures listed below will be included with the Project to minimize adverse visual effects and enhance the visual and aesthetic opportunities that the Project will create.

- *Develop and apply design guidelines that will establish a consistent design framework for the Project with consideration of local context.*
- *Coordinate the project design with the City's transit-oriented development (TOD) program within the Department of Planning and Permitting.*
- *Consult with the communities surrounding each station for input on station design elements.*
- *Consider specific sites for landscaping and trees during the final design phase when plans for new plantings will be prepared by a landscape architect. Landscape and streetscape improvements will serve to mitigate potential visual impacts.*

In addition, the Project will provide passengers with expansive views from several portions of the corridor by elevating riders above highway traffic, street trees, and low structures adjacent to the alignment.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-332497

Mr. Herb Rothouse
1910 Ala Moana Boulevard
Honolulu, Hawaii 96815

Dear Mr. Rothouse:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

Chapter 6 of the Final EIS provides the Cost and Financial Analysis for the Project. The capital cost estimate for the Project is presented in Table 6-1 of the Final EIS. Estimated cost in Year-of-Expenditure dollars is approximately $5,120 million. The costs follow the structure and requirements of the Federal Transit Administration (FTA).

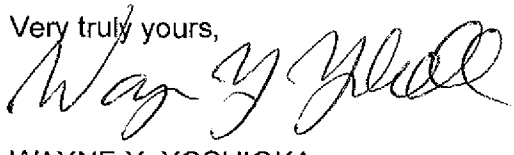
As stated in Chapter 3 of the Final EIS, "Adding substantial passenger capacity with more buses is not feasible in some key locations along the system because of roadway capacity constraints. Choke points occur in Downtown Honolulu during the a.m. peak period, especially at the merger of North Beretania, North King, and Liliha Streets, and Dillingham Boulevard and along Hotel Street. King Street has been used to introduce new service in recent years due to the capacity limitation of Hotel Street; however, choke points occur at the Chinatown bus stops and at the Punchbowl Street and King Street stops. Buses often must wait to move into an

open and safe boarding position. Continuing to add additional service to King Street without major physical improvements would add to the gridlock in this corridor, deteriorate transit service, and complicate pedestrian and traffic safety issues. In the p.m. peak period, choke points occur along Beretania Street, Hotel Street, Nimitz Highway, and Ala Moana Boulevard in the Downtown area."

Lastly, as stated in Chapter 3 of the Final EIS, bus service will be enhanced and modified to coordinate with the rail system. Some existing bus routes will be altered or eliminated to reduce duplication of services provided by the fixed guideway system. Buses removed from service in the study corridor will be shifted to service in other parts of the island. Certain local routes will be rerouted to provide frequent and reliable connections to the nearest rail station. A description of the future bus network, including route numbers and frequencies, is included in Appendix D of the Final EIS.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,



WAYNE Y. YOSHIOKA
Director

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-332499

Mr. Leslie A. Among
1720 Ala Moana Boulevard
Suite E103
Honolulu, Hawaii 96815

Dear Mr. Among:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

The future extensions to West Kapolei, Salt Lake Boulevard, Waikiki, and UH Manoa are discussed in the cumulative impacts sections of Chapters 3 and 4 of the Final EIS; however the future extensions are not part of this Project, thus they are not required to be evaluated under Chapter 343 of the Hawaii Revised Statutes and NEPA. Under NEPA, environmental analysis is only required when there is a proposed action by a Federal agency. Here, because the future extensions are not proposed for implementation at this time, they are not part of the Project studied in the Final EIS. It would be premature to undertake an environmental analysis of the extensions (beyond the cumulative impacts analysis) because they are not part of the proposed action to be taken by the City and FTA. If the extensions are proposed for implementation in the future, environmental analysis of the extensions and appropriate alternatives will be undertaken at that time. Bus service between Ala Moana Center and these destinations will be enhanced

until those extensions are built. Nonetheless, your suggestions on routing could be considered at such time the extensions to University and Waikiki move forward.

As presented at the end of Section 2.5.10 of the Final EIS, the planned extension to UH Manoa is included as an illustrative project in the ORTP (OahuMPO 2007) and is anticipated by DTS to be completed some time prior to 2030 as a separate project that would receive its own detailed environmental review. Conceptually, the route described in the Draft EIS is feasible, but preliminary engineering alignment work was not completed for the Draft EIS. The preliminary engineering work will be performed in concert with the full environmental review. The environmental review will allow the public to present their ideas for alternatives, such as the one you proposed in your testimony.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT10/09-336969

Mr. Richard Ubersax
41-1013 Laumilo Street
Waimanalo, Hawaii 96795

Dear Mr. Ubersax:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

Table 6-2 in the Honolulu High-Capacity Transit Corridor Project Alternatives Analysis Report presents estimated cost-effectiveness for the "20-mile" Fixed Guideway Transit Alternative from East Kapolei to Ala Moana Center ($22.75 per hour of user benefit) and for the "full-corridor" Fixed Guideway Transit Alternative from Kapolei to UH Manoa ($22.11 per hour of user benefit). Both alternatives were under the $22.99 threshold for a rating of "Medium" at the time the report was issued.

The Draft EIS only reports estimates of cost-effectiveness for those Build Alternatives addressed in the document, namely three Fixed Guideway Transit Alternatives from East Kapolei to Ala Moana Center. The Project has logical termini at East Kapolei and Ala Moana Center and independent utility from any extensions that may be constructed in the future. The future extensions to West Kapolei, Salt Lake Boulevard, Waikiki, and UH Manoa are discussed in the cumulative impacts sections of Chapters 3 and 4 of the Final EIS. However the future extensions are not part of this Project; thus, they are not required to be evaluated under

Chapter 343 of the Hawaii Revised Statutes and NEPA. Under NEPA, environmental analysis is only required when there is a proposed action by a Federal agency. Here, because the future extensions are not proposed for implementation at this time, they are not part of the Project studied in the Final EIS. It would be premature to undertake an environmental analysis of the extensions (beyond the cumulative impacts analysis) because they are not part of the proposed action to be taken by the City and FTA. If the future extensions are proposed for implementation in the future, environmental analysis of the extensions and appropriate alternatives will be undertaken at that time. FTA's current threshold for a "Medium" rating is $23.99 expressed in 2009 dollars. A cost-effectiveness analysis was not performed for these extensions in the Draft EIS as they are not part of the Project.

The difference in the cost-effectiveness index reported in the Draft EIS and the Alternatives Analysis is related to a more thorough development of user benefits. In Chapter 7 of the Draft EIS, user benefits are calculated based on travel demand modeling, which was completed in accordance with specific FTA requirements. In this case, there were additional benefits above those identified in the Alternatives Analysis that accrue to the Project in areas not directly related to ridership figures. The cost-effectiveness calculation has been reviewed by the FTA and found to have been developed consistent with its guidance.

The "Project," for purposes of the FTA in the Draft EIS, is the 20-mile alignment between East Kapolei and Ala Moana Center. The planned extensions are not part of the Draft EIS because they are not part of the Project being evaluated. They are included in the cumulative effects analysis in Sections 3.6 and 4.1 of the Draft EIS.

At such time that funding is made available for these extensions, a new EIS or other environmental documentation will be prepared that will consider the cost-effectiveness of these projects. They will be subject to the same requirements and scrutiny as applied to the current EIS process.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

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MUFI HANNEMANN
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WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/090-332500

Mr. Chris Dolph
400 Hobron Lane
Honolulu, Hawaii 96815

Dear Mr. Dolph:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

Chapter 6 of the Final EIS provides a financial analysis for the Project. Also, as stated in Section 4.18.1 of the Final EIS, the Project will generate an average of about 10,000 jobs per year over the nine-year construction period. The Project is consistent with proposals at the national level to stimulate public works activities to create employment opportunities.

The concepts, which you discuss in your comment letter, are discussed as the Managed Lane Alternative in Chapter 2 of the Final EIS. In "Chapter 2 – Alternatives Considered" of the Alternative Analysis report, November 2007, as well as in Chapter 2, Alternatives Considered, of the Final EIS, two options were considered for the Managed Lane Alternative—two-direction and reversible. This alternative would have provided a two-lane elevated toll facility between Waipahu and Downtown Honolulu, with variable pricing strategies to maintain free-flow speeds for transit and high-occupancy vehicles (HOVs). The Two-Direction Option would have served

express buses operating in both directions during the entire day. To maintain free-flow speeds in the Two-Direction Option, it would be necessary to charge tolls to manage the number of HOVs using the facility. For the Reversible Option, three-person HOVs would be allowed to use the facility for free, while single-occupant and two-person HOVs would have to pay a toll. The Reversible Option was found be optimal.

The findings are summarized in Chapter 2 of the Final EIS as follows: The Managed Lane Alternative was evaluated for its ability to meet project goals and objectives related to mobility and accessibility, supporting planned growth and economic development, constructability and cost, community and environmental quality, and planning consistency. While this alternative would have reduced congestion on parallel highways, systemwide traffic congestion would have been similar to the No Build Alternative as a result of increased traffic on arterials trying to access the facility. Total island-wide vehicle hours of delay would have increased with the Managed Lane Alternative compared to the No Build Alternative, indicating an increase in systemwide congestion (Table 2-2, Final EIS).

The Managed Lane Alternative would not have supported planned concentrated future population and employment growth because it would not provide concentrations of transit service that would serve as a nucleus for transit-oriented development. The Managed Lane Alternative would have provided little transit benefit at a high cost. The cost-per-hour of transit-user benefits for the Managed Lane Alternative would have been two to three times higher than that for the Fixed Guideway Alternative. Similar to the Transportation System Management (TSM) Alternative, the Managed Lane Alternative would not have substantially improved service or access to transit for transit-dependent communities. No funding sources were identified for the Managed Lane Alternative. Toll revenues from the Managed Lanes Alternative would pay for ongoing operations and maintenance while remaining revenues would be used to repay debt incurred to construct the system.

The Managed Lane Alternative would have generated the greatest amount of air pollution, required the greatest amount of energy for transportation use, and would have resulted in the largest number of transportation noise impacts of all the alternatives evaluated. Because the Managed Lane Alternative would have served a shorter portion of the study corridor (approximately 16 miles compared to the 20 miles served by the fixed guideway), it would have resulted in fewer displacements and would have impacted fewer archaeological, cultural, and historic resources than the Fixed Guideway Alternative. The Managed Lane Alternative would not have affected any farmlands. Visually, the elevated structure would have extended a shorter distance, but it would have been more visually intrusive because its elevated structure, with a typical width of between 36 and 46 feet, would have been much wider than the Fixed Guideway Alternative.

After the Alternatives Analysis was completed, several scoping comments were received requesting reconsideration of the Managed Lane Alternative that was considered and rejected during the Alternatives Analysis. Because no new information was provided that would have changed the findings of the Alternatives Analysis regarding the Managed Lane Alternative, it was not included in the Draft EIS for further consideration.

In addition, the TSM Alternative studied during the Alternatives Analysis increased bus service. The alternative included express bus service that operated as bus rapid transit in existing facilities. Bus frequencies would have been increased during peak periods to provide improved service for work-related trips, particularly from developing areas. The bus fleet was assumed to increase from 525 to 765 buses, and park-and-ride lots were assumed at West Kapolei, UH West Oahu, Waipio, and Aloha Stadium. The TSM Alternative would have improved transit travel times, but it would have done little to improve corridor mobility and travel reliability. Roadway congestion also would not have been alleviated. Because buses are subject to the same congestion faced by car drivers, they cannot respond effectively to demands for better mobility or reliability. These effects of congestion are detailed in Chapter 3 of the Final EIS.

As stated in Chapter 3 of the Final EIS, "Adding substantial passenger capacity with more buses is not feasible in some key locations along the system because of roadway capacity constraints. Choke points occur in Downtown Honolulu during the a.m. peak period, especially at the merger of North Beretania, North King, and Liliha Streets, and Dillingham Boulevard and along Hotel Street. King Street has been used to introduce new service in recent years due to the capacity limitation of Hotel Street; however, choke points occur at the Chinatown bus stops and at the Punchbowl Street and King Street stops. Buses often must wait to move into an open and safe boarding position. Continuing to add additional service to King Street without major physical improvements would add to the gridlock in this corridor, deteriorate transit service, and complicate pedestrian and traffic safety issues. In the p.m. peak period, choke points occur along Beretania Street, Hotel Street, Nimitz Highway, and Ala Moana Boulevard in the Downtown area. Several routes, including CountryExpress! Routes C, D, and E are projected to be overloaded in 2030. Increasing frequency would require headways at five minutes or less. Further, the downtown street network cannot support the number of buses that would be required to meet projected demand."

Schedules cannot be guaranteed because of congestion, and many buses will have to pass up passengers as they fill to capacity during critical times (as happens now). Adding buses could help minimize the number of passengers left behind but will not address the schedule adherence issue.

Furthermore, from an energy and cost perspective, buses are less efficient in carrying a given number of riders than a fixed guideway. Buses also face very real space limitations in some parts of the City. The number of buses that would be required to carry the same number or riders that will use the fixed guideway in the Downtown area would be impossible to fit onto downtown streets. TheBus is a successful system and is the most efficiently used system in the U.S. based on information from the National Transit Database. Still, by itself based on the analysis conducted for the Alternatives Analysis, it is not a solution to solve the existing and anticipated congestion in Honolulu.

As stated in Chapter 3 of the Final EIS, bus service will be enhanced and modified to coordinate with the rail system. Some existing bus routes will be altered or eliminated to reduce duplication of service. Buses removed from service in the study corridor will be shifted to other parts of the island. Certain local routes will be rerouted to provide frequent and reliable connections to the nearest rail station. Total travel time, including transfers to bus, will be the

same as today or less. A description of existing and future bus routes, including frequencies, is included in Appendix D of the Final EIS.

Providing free bus travel during peak hours would not support the Purpose and Need of the Project. Buses are already crowded during peak hours and making them free would exacerbate this problem while reducing revenue that could be used to support expansion of the system.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

DEPARTMENT OF TRANSPORTATION SERVICES

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-332505

Mr. Steve Scott
1212 Kona Street
Honolulu, Hawaii 96814

Dear Mr. Scott:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

While there are 199 properties affected at a cost of $157 million in 2009 dollars (Table 6-1 in the Final EIS), most of the Project will be built in the median of existing public roadways. The vast majority of the acquisitions are narrow strips of property along the affected roadways. The $157 million estimate for right-of-way acquisition is based on comparisons of property values in the general area, not typically on individual properties.

Appendix C in the Final EIS shows the full and partial acquisitions near the corner of Piikoi and Kona Street. As design progresses, there will be a better understanding as to the extent to which properties along Kona Street will be affected. Project staff will be working with all affected property owners as the Project progresses.

As detailed in Section 1.1.2 of the Draft EIS, and as approved by the City Council with Resolution 07-039, the Project extends from East Kapolei to Ala Moana Center. The Project, as addressed in the Draft EIS, matches the limits established in Resolution 07-039. Termination of the Project at Ala Moana Center has been public since Resolution 07-039. The Project has been designed to allow for an extension to climb over the Ala Moana Center parking garage that is immediately beyond the end of the Project. The only subsequent change was the decision by the City Council to recommend the Airport Alternative as the Preferred Alternative for the First Project. The alignment decisions for the future extensions would be made through a separate environmental review process that would include public involvement at the time the extensions are proposed for implementation, once funding is available.

Future extensions are not precluded by the Project identified in the Draft and Final EISs. The 35-foot-high station at Ala Moana Center is a practical terminus for the Project, which will serve the shopping center and area properties. In the future, when funding is available, the extension would be designed to best accommodate the possibilities available at that time. The high level option over the shopping center is still available and does not obviate the need for the 35-foot option built now. There are operating plans for the system that will continue to rely on the 35-foot station even after an extension is built.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT10/09-336975

Mr. Bryan Hoernig
1211 Kona Street
Honolulu, Hawaii 96814

Dear Mr. Hoernig:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal.

As stated in Section 4.4.3 of the Final EIS: Where relocations will occur, compensation will be provided to affected property owners, businesses, or residents in compliance with all applicable Federal and State laws and will follow the Federal Uniform Relocation Assistance and Real Property Acquisition Policies Act. The measures related to acquisitions and relocations include the following:

- *The City will assist all affected persons in locating suitable replacement housing and business sites within the means of individuals or businesses.*
- *A minimum 90-day written notice will be provided before any business or resident will be required to move.*

- *Relocation services will be provided to all affected business and residential property owners and tenants without discrimination; and persons, businesses, or organizations that are displaced as a result of the Project will be treated fairly and equitably.*

Where landscaping, sidewalks, and driveway access will be affected by the Project, coordination will occur with the landowner, and these property features will be replaced, restored, and/or the property owner will be compensated.

The notice you received was to inform you of the possibility that your property may be affected. As design progresses, there will be a better understanding as to the extent to which properties along Kona Street will be affected. Project staff will be working with all affected property owners as the Project progresses.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-332509

Mr. Terry Conlan
1535 Punahou Street, #704
Honolulu, Hawaii 96822

Dear Mr. Conlan:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

The EIS is a disclosure and decision-making document; it is not a work plan for long-range evaluation. Project goals and objectives are described in Chapter 1 of the Final EIS.

As described in Section 2.5.10, Project Phasing, and further in Section 8.6.9, Construction Phasing, in the Final EIS, to support phased opening, the first construction phase must be connected to a maintenance and storage facility, which requires considerable space. No location has been identified closer to Downtown with sufficient available space to construct a maintenance and storage facility. Therefore, though it is understood that ridership will be low until the line reaches more critical destinations closer to downtown, construction will begin between East Kapolei and Leeward Community College. The Project will be constructed in phases to accomplish the following:

- *Match the anticipated schedule for right-of-way acquisition and utility relocations.*
- *Reduce the time that each area will experience traffic and community disturbances.*
- *Allow for multiple construction contracts with smaller contract size to promote more competitive bidding.*
- *Match the rate of construction to what can be maintained with local workforce and available financial resources.*
- *Balance expenditure of funds to minimize borrowing.*

The portion of the corridor in the Ewa direction of Pearl Highlands is less developed than the areas in the Koko Head direction. Right-of-way can be obtained more quickly at the west end of the Project; therefore, overall project construction can begin earlier, resulting in lower total construction costs. Construction is planned to continue uninterrupted in the Koko Head direction from Pearl Highlands to Aloha Stadium, Kalihi, and finally to Ala Moana Center.

As portions of the Project are completed, each will be opened incrementally so that system benefits, even if limited during the initial phases, will be realized prior to completion of construction of the entire Project.

As described in Chapter 2 of the Final EIS, several alignments were evaluated during the Alternatives Analysis process. One evaluated alignment was the historic OR&L line. A combination of issues, including utilities that have been placed in the right-of-way, poor location in several places, and the previous loss of the right-of-way in several locations all contributed to the elimination of that option. Every attempt is being made to minimize property takes and dislocations along the proposed right-of-way, and this is one reason for the decision to elevate the guideway.

A travel demand forecasting model used by the Oahu Metropolitan Planning Organization was used to determine which guideway stations will have the highest demand of people driving to access the transit system. While there are more than 4,100 spaces identified as part of the Project, the experience with park-and-ride facilities in Honolulu to date is limited. Generally, it has been found that parking facilities are underused. The lots contained in the Project are located toward the Ewa end of the route and are based on consideration of parking demand using the travel demand forecasting model for the year 2030. Further, the projected mode of access shares were compared to observed data from several Mainland areas, notably San Diego. Given the history of park-and-ride use on the island, it seems prudent to evaluate any need for additional or larger facilities on the basis of empirical experience rather than commit substantial additional funding now. Any need for additional parking at the four stations with park-and-ride facilities or other locations would best be determined once experience is gained about their use.

The luggage policy for the system is not final, but the concept of the policy will be to allow luggage that does not interfere with the safety or comfort of other passengers. In

response to your last point, the Final EIS contains additional information about several aspects of the Project. Many of these changes are a result of public comments received on the Draft EIS. Please see the first section of each Chapter for a description of changes since the Draft EIS.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT10/09-335714

Ms. Amy Kimura
1310 Heulu Street, #1002
Honolulu, Hawaii 96822

Dear Ms. Kimura:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

The corridor from Kapolei to UH Manoa (i.e., the study corridor) is well suited for the fixed guideway project. In 2000, 63 percent of Oahu's population of 876,200 and 80 percent of its 501,100 jobs were located within the study corridor. By 2030, these distributions will increase to 69 percent of the population and 83 percent of the employment as development continues to be concentrated into the Primary Urban Corridor and Ewa Development Plan areas. As stated in Section 1.3.1 of the Final EIS, 2,036,000, or 73 percent, of the approximately 2,790,000 islandwide daily trips, and 350,000, or 64 percent, of the 544,000 a.m. peak-period work-related trips are currently generated within the study corridor. The study corridor attracts an even higher percentage of islandwide work-related trips with 446,000, or 82 percent, of a.m. peak-period work-related trips having destinations within the study corridor.

The EIS assumes that fares for all transit modes, including the fixed guideway line and TheBus, will be the same with a fare structure similar to today. Zone fares or distance-based fares are not assumed. The EIS also assumes that the City's current policy will remain in effect (i.e., that fare revenues will pay for between 27 and 33 percent of annual operating and maintenance costs).

As described in Section 6.4.2 of the Final EIS, "The fare structure for the fixed guideway is assumed to follow the current bus fare structure, with transfers between modes assumed to be free." Current users of the TheBus with its fare structure for limited income populations will be able to transfer onto or directly access the fixed guideway system with their current bus passes or one-way fare. Since the fare structure is assumed to be the same and that transit-dependent households will experience a substantial time benefit (as shown in Figure 3-5 of the Final EIS), the combination of a consistent fare structure across modes coupled with a decrease in travel time is anticipated to attract motorists out of their cars. Fares are anticipated to increase with inflation and the cost of automobile ownership, and use is anticipated to increase at or above the rate of general inflation.

Chapter 6 of the Final EIS describes the financial resources anticipated to be needed to pay for ongoing operating and maintenance costs. Operating and maintenance costs will be paid for from the same sources currently used for TheBus: Federal funding, fare revenues, and subsidies from the City's General and Highway Funds. It is anticipated that with an integrated bus and rail system in place that a slightly higher percentages of the City's operating budget will be used for transit than is currently the case.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

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SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-332653

Mr. Tom Heinrich
2426 Armstrong Street
Honolulu, Hawaii 96822-1932

Dear Mr. Heinrich:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

Chapter 4 of the Final EIS includes an evaluation of the cumulative effects of the Project with other past, present, and reasonably foreseeable actions. The Project extensions, which would include a rail line to UH Manoa, are considered foreseeable projects, although no design or construction is planned until funding can be identified. The Project has logical termini at East Kapolei and Ala Moana Center and independent utility from any extensions that may be constructed in the future. The future extensions to West Kapolei, Salt Lake Boulevard, Waikiki, and UH Manoa are discussed in the cumulative impacts sections of Chapters 3 and 4 of the Final EIS; however the future extensions are not part of this Project, thus they are not required to be evaluated under Chapter 343 of the Hawai'i Revised Statutes and NEPA. Under NEPA, environmental analysis is only required when there is a proposed action by a Federal agency. Here, because the future extensions are not proposed for implementation at this time, they are not part of the Project studied in the Final EIS. It would be premature to undertake an environmental analysis of the extensions (beyond the cumulative impacts analysis) because

they are not part of the proposed action to be taken by the City and FTA. If the future extensions are proposed for implementation in the future, environmental analysis of the extensions and appropriate alternatives will be undertaken at that time. When the planned extensions are evaluated in the future, a range of alternatives will be fully evaluated for each of them, including this extension. Because of the lack of engineering design for the future extensions, only a general analysis can be completed at this time.

Regarding concerns about the station design in Mo'ili'ili, the assessment of visual effect due to the Project, as described in Section 4.8.3 of the Final EIS considers changes to the visual landscape and viewer responses to those changes. This includes consideration of the existing development along the Project alignment. As noted, the Project does not yet extend to the University so views and design for that segment are not included. Nonetheless, as part of the design process, the City has developed design principles, which are identified in the Honolulu High-Capacity Transit Corridor Project Compendium of Design Criteria (RTD 2009m) that will be implemented in final design to minimize visual effects of the Project. For example, guideway materials and surface textures will be selected in accordance with generally accepted architectural principles to achieve effective integration between the guideway and its surrounding environment. Landscape and streetscape improvements will mitigate potential visual impacts, primarily for street-level views. These would be applied to a future University segment also.

Other measures to address visual impacts of the Project will be developed through the station design and planning process. The initial station area plans and design guidelines were first developed with coordination between DTS and the Department of Planning and Permitting (DPP). The next level of transit station design focuses on integrating individual neighborhood characteristics of the communities served by the stations. So, any concepts developed for consideration at this stage are premature.

The following mitigation framework will be included in the Project and in future extensions to minimize negative visual effects and enhance the visual and aesthetic opportunities that it creates:

- *Develop and apply design guidelines that will establish a consistent design framework for the Project with consideration of local context.*
- *Coordinate the project design with City TOD planning and DPP.*
- *Consult with the communities surrounding each station for input on station design elements.*
- *Consider specific sites for landscaping and trees during the final design phase when plans for new plantings will be prepared by a landscape architect. Landscape and streetscape improvements will serve to mitigate potential visual impacts.*

Section 4.8.3 of the Final EIS, Design Principles and Mitigation includes information related to the mitigation framework described above. Specifically architecture and landscape design criteria include guidelines regarding site design, materials and finishes, and lighting, which apply to stations, station areas, and the guideway.

As stated in Section 4.2.1 of the Final EIS, the Project was evaluated to assess whether it will be consistent with adopted transportation and urban development plans. This includes the

Primary Urban Center development plans. Section 4.2.2 of the Final EIS states that development plans for the Primary Urban Center and Ewa direct new growth and its supporting transit facilities and TOD to these areas. Sustainable community plans for East Honolulu, Central Oahu, and other parts of the island focus on supporting the character of these communities and preserving their natural and cultural resources.

The Project is focused exclusively on the construction and implementation of rail transit service, and that is what is covered in the Final EIS. However, as discussed in Section 4.19.2 of the Final EIS, TOD is expected to occur in project station areas as an indirect effect of the Project. The increased mobility and accessibility that the Project will provide will also increase the desirability and value of properties near the stations, thereby attracting new real estate investment nearby (in the form of TOD). Planning and zoning around station areas will be developed in the future by DPP under a process covered by the City's new TOD Ordinance (09-4).

In March 2009, the City Council approved and the Mayor of Honolulu signed Bill 10 (2008) (ordinance 09-4), which defines the City's approach to TOD around fixed guideway stations. The special districts encourage public input into the design of TOD neighborhood plans to reflect unique community identities.

In response to your statement that the Project should work with the Hawaii Department of Transportation (HDOT), consultation with HDOT has been ongoing throughout the Project's planning process. When planning is undertaken for the planned extensions, the efforts will be coordinated with HDOT as they relate to the H-1/University Avenue Interchange.

Lastly, Chapter 4 of the EIS includes an evaluation of the cumulative effects of the Project with other past, present, and reasonably foreseeable actions, including future fixed guideway extensions. Because the effects of the extensions would not be caused by the Project and because they are speculative of future actions, the detail of the analysis cannot match that for the Project. When the planned extensions are evaluated in the future, a range of alternatives will need to be evaluated for each of them.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

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MUFI HANNEMANN
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SHARON ANN THOM
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June 11, 2010 RT9/09-332657

Mr. Charles Carole
1310 Heulu Street, #1002
Honolulu, Hawaii 96822

Dear Mr. Carole:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

As noted in Chapter 2 of the Final EIS, bus service will be enhanced and the bus network will be modified to coordinate with the fixed guideway system. Some existing bus routes, including peak-period express buses, will be altered or eliminated to reduce duplication of services provided by the fixed guideway system. Route 1 will continue to operate between Kalihi and Kahala without any changes to current service levels. Local bus service in Kahala, currently provided by Route 14, will not be affected by rail implementation. Further information on effects to future bus routes and frequency is provided in Appendix D of the Final EIS.

To address your second point, the EIS uses the socio-economic data that were available from the OahuMPO at the time the EIS work began, based on the Department of Business, Economic Development, and Tourism's (DBEDT) Population and Economic Projections for the

State of Hawaii to 2030 prepared in August 2004. The 2030 forecast year used in the Draft and Final EISs is consistent with FTA guidance for New Starts projects.

DBEDT has prepared new forecasts at the County level, as discussed in Population and Economic Projections for the State of Hawaii to 2035 issued in January 2009. For use in travel forecasting, these County-level forecasts must be disaggregated to the level of "Travel Analysis Zones" of which there are 764 on Oahu. At the time of the publication of the Draft EIS, these zonal-level forecasts had not been prepared and accepted by the OahuMPO.

The January 2009 DBEDT forecasts have lower population projected than the August 2004 forecasts. Specifically, the January 2009 population forecast for Oahu for 2030 is 3.3 percent lower than the August 2004 forecast. However, the 2030 employment forecast for Oahu from the January 2009 series is 5.8 percent higher than the August 2004 forecast. Thus, it is not clear what the effect on ridership projections would be of using the January 2009 forecast, since the higher employment forecast would likely result in more work trips on transit while the lower population forecast would likely result in fewer trips for other purposes.

There is no foundation for the assertion that the present economic situation will result in hyperinflation and devaluation of the dollar. To be sure that the changing conditions are accounted for, Chapter 6 of the Final EIS reflects the latest economic trends in both costs and revenues.

The financial plan for the Project is a dynamic document that will be updated periodically as conditions warrant. The latest version of the financial plan (August 2009) incorporates the forecast reductions in General Excise and Use Tax (GET) surcharge collections and recognizes a reduction in the cost of many of the primary commodities needed for construction. The financial plan is a strategic document that recognizes the economy will rise and fall. Historically, these are relatively short-term fluctuations within the much longer life of the plan. At this point, there are no inconsistencies with the findings of the financial plan and trends in the economy. That includes the effects on tourism.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

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SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-332660

Mr. Philip Blackman
1676 Ala Moana Boulevard, #406
Honolulu, Hawaii 96815

Dear Mr. Blackman:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

The Final EIS addresses all the disciplines required under NEPA for a project of this nature. Still, there are likely some areas not covered by NEPA that will not receive specific attention under an EIS. Regarding construction, the effects of the construction process and the short-term impacts of construction activity are discussed in Sections 3.5 and 4.18 of the Final EIS.

City bus service is currently provided to Pearl Harbor Naval Base and Hickam Air Force Base. It is assumed that this service will continue, although with an increased frequency. The cost of providing this bus service is included in the operating and maintenance cost estimates presented in Section 6.4 of the Final EIS. There is no plan to prevent employees or seamen from driving their own vehicles as they do now. The Project is intended to offer an alternative to the private automobile. On the basis of its performance, there will be many who choose the

transit service over continuing to drive their own vehicle. Ideally, in addition to taking a shuttle to or from the station, many will be able to access their place of employment or home on bicycle or by foot.

Federal regulations do not include language that would require the Project to have rider characteristics similar to what would be accommodated by local bus service. As noted in Section 2.5.6 of the Final EIS, bus service will be enhanced, and the bus network will be modified to coordinate with the fixed guideway system. Typical experience in cities that have built rail systems is that rail attracts a wide variety of users, and it is not necessarily a function of income, employment type, or car ownership. The attraction for most people who choose to ride is time savings and convenience.

The Project is focused exclusively on the construction and implementation of rail transit service, and that is what is covered in the Draft and Final EISs. However, as discussed in Section 4.19.2 of the Final EIS, transit-oriented development (TOD) is expected to occur in project station areas as an indirect effect of the Project. The increased mobility and accessibility that the Project may provide will also increase the desirability and value of land near stations, thereby attracting new real estate investment nearby (in the form of TOD). Planning and zoning around station areas will be conducted and established by the City's Department of Planning and Permitting under a process covered by the City's new TOD Ordinance 09-4 that was developed in anticipation of the Project in March 2009.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

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SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-332662

Mr. Scott Wilson
3524 Woodlawn Drive
Honolulu, Hawaii 96822

Dear Mr. Wilson:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

The Project has logical termini at East Kapolei and Ala Moana Center and independent utility from any extensions that may be constructed in the future. The future extensions to West Kapolei, Salt Lake Boulevard, Waikiki, and UH Manoa are discussed in the cumulative impacts sections of Chapters 3 and 4 of the Final EIS; however the future extensions are not part of this Project, thus they are not required to be evaluated under Chapter 343 of the Hawaii Revised Statutes and NEPA. Under NEPA, environmental analysis is only required when there is a proposed action by a Federal agency. Here, because the future extensions are not proposed for implementation at this time, they are not part of the Project studied in the Final EIS. It would be premature to undertake an environmental analysis of the extensions (beyond the cumulative impacts analysis) because they are not part of the proposed action to be taken by the City and FTA. If the future extensions are proposed for implementation in the future, environmental analysis of the extensions and appropriate alternatives will be undertaken at that time.

Visual and aesthetic conditions are discussed in Section 4.8 of the Final EIS. The Project will be set in an urban context where visual change, including shade and shadow, is expected, and differences in scales of structures are typical. Section 4.8.3 states that the fixed guideway and stations will be elevated structures. They will result in noticeable changes to views where the Project elements will be near existing views or in the foreground of these views. Impacts for the ground-level environment are illustrated by most of the visual simulations included in the Final EIS.

As these figures illustrate, the guideway support columns will be in the roadway median or to one side of the roadway. Landscaping will be provided at stations but generally not under the guideway. Column materials and surface textures will be selected in accordance with generally accepted architectural principles to integrate the guideway with its surrounding environment. The shadow pattern created at ground level by the guideway and stations will change throughout the day and seasonally, depending on the alignment's direction, time of day, and time of year.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-332663

Mr. James R. McManus
860 Halekauwila Street, #2708
Honolulu, Hawaii 96813

Dear Mr. McManus:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

Your support for the Project has been noted. The Project will substantially improve transit travel time and reliability. While each of the alternatives discussed in the Draft EIS includes trade-offs between benefits and impacts, the Airport Alternative from East Kapolei to Ala Moana has been selected as the Preferred Alternative as described above. As compared to the alternatives discussed in the Draft EIS, the Airport Alternative will carry the most passengers, provide the greatest transit-user benefits, and result in the fewest vehicle hours of delay. It will provide access to employment centers at Pearl Harbor Naval Base and Honolulu International Airport and will serve the Salt Lake neighborhood with connecting bus service. Of the three Build Alternatives addressed in the Draft EIS, the Airport Alternative will have slightly less impacts to the natural and built environment analyzed in the Draft EIS. During the public comment period on the Draft EIS, the public overwhelmingly supported the Airport Alternative. Of the comments that specifically supported one of the alternatives, more than 75 percent were

in support of the Airport Alternative. For more information this selection is discussed in Section 2.4 of the Final EIS. Since publication of the Draft EIS, design has been advanced, further analysis has been completed, and information has been added in response to comments on the Draft EIS and agency coordination. The Final EIS discusses the process that was used to select the Preferred Alternative, how comments were considered in the decision-making process, impacts and mitigation commitments.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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KENNETH TORU HAMAYASU
DEPUTY DIRECTOR

June 11, 2010

RT10/09-336976

Mr. Mike Uechi
98-111 Kaahele Place
Aiea, Hawaii 96701

Dear Mr. Uechi:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

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The impacts on future traffic conditions of building or not building the Project are described in Chapter 3 of the Final EIS. The project alternatives were developed to address the Purpose and Need for the Project and evaluated based on how well they addressed the identified needs. According to the Alternatives Analysis phase of the Project, regardless of which solution is selected for implementation, conditions will be worse in 2030 than now. Among all the options evaluated in the Alternatives Analysis, however, the fixed guideway substantially outperformed the others based on measures of mobility, reliability, support of planned growth areas, environmental impacts, cost-effectiveness, feasibility, and fairness. As shown in Chapter 3 of the Final EIS, the Project will reduce delay by 18 percent in 2030. No other alternative was found to accomplish such an improvement.

The capital plan that analyzes capital expenditures for the Project is presented in Section 6.3 of the Final EIS, including a description of the amount of funding anticipated from various sources. Capital costs of the Project, including finance charges, are expected to be fully paid for by a combination of FTA Section 5309 New Starts Funds and FTA Section 5307 Funds from the Federal government and revenues from the County General Excise and Use Tax (GET) surcharge levied from 2007 through 2022. The FTA New Starts Program requires a series of successively more detailed steps to be taken that show refinement in design and financing and are subject to FTA approval. In general, local funds must represent at least 50 percent of the project budget to realistically qualify for FTA funding. The GET surcharge provides 70 percent of the cost of the Project. As noted above, Chapter 6 also discusses other options for raising revenue should it be necessary to find additional funds. Section 6.6 of the Final EIS describes risks and uncertainties associated with these funding assumptions, including receipt of Federal Funds through a Full Funding Grant Agreement with FTA. The City has submitted the application to enter Preliminary Engineering and qualify for Federal New Starts Funds.

The capital plan accounts for the effects of the economic downturn and continues to be balanced. Ordinance 07-001 which approved the GET surcharge on Oahu for use in constructing a fixed guideway project does not authorize the use of property taxes to fund the project construction.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

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June 11, 2010

RT10/09-336981

Ms. Michelle Matson
3931 Gail Street
Honolulu, Hawaii 96815

Dear Ms. Matson:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address comments regarding the above-referenced submittal:

The island's unique visual character and scenic beauty was considered in the visual and aesthetic analysis presented in the Final EIS Section 4.8. The Project primarily will be set in an urban context where visual change is expected and differences in scales of structures are typical. The visual effects on Honolulu's Downtown, including the Aloha Tower, Irwin Park, Dillingham Transportation Building, Bishop Street, Chinatown Historic District and Mother Waldron Neighborhood Park, are discussed under the Kalihi to Ala Moana Center Landscape Unit, discussed in Section 4.8.2 of the Final EIS. The Project complies with Section 106 of the National Historic Preservation Act and Section 4(f) of the Department of Transportation Act, and coordination with the regulatory agencies responsible for compliance is ongoing as documented in Section 4.16 and Chapter 5 of this Final EIS.

The guideway and some stations will partially block mauka-makai public views from streets that intersect the alignment. DTS will coordinate with the Department of Planning and Permitting (DPP); however, changes to some views will be unavoidable. Depending on the degree of view obstruction or blockage, some view changes will be substantial. The viewer's response to this change will vary with exposure and sensitivity and depend on the alignment orientation, guideway and station height, and height of surrounding trees and/or buildings.

The Embarcadero Freeway in San Francisco was an elevated highway, not rail, and thus is not directly comparable to this project

Although mitigation measures will minimize many adverse visual effects by providing visual buffers and reducing visual contrasts between the project elements and their surroundings, the Final EIS acknowledges, as concluded in the Section 4.8.3 of the Final EIS, that probable unavoidable adverse effects, such as view blockage, cannot be mitigated and will be significant (noted as a "High" level of visual impact in the Draft EIS) in some areas.

The Project will introduce a new linear visual element to the corridor, and changes to some views will be significant and unavoidable. The guideway and some stations will partially block mauka-makai public views from streets that intersect the alignment.

The City will implement the following mitigation framework (see Section 4.8.3) with the Project to minimize negative visual effects and enhance the visual and aesthetic opportunities that it creates:

- *Develop and apply design guidelines that will establish a consistent design framework for the Project with consideration of local context.*
- *Coordinate the project design with the City TOD planning and DPP.*
- *Conduct public involvement workshops to consult with the communities surrounding each station for input on station design elements.*
- *Consider specific sites for landscaping and trees during the final design phase when plans for new plantings will be prepared by a landscape architect. Landscape and streetscape improvements will serve to mitigate potential visual impacts.*

Even with mitigation measures, some obstruction and changes to views will result in a high level of visual impact, or, a significant impact, and changes to some views will be unavoidable. These effects will be most noticeable where the guideway and stations are nearby or in the foreground of views.

Some views and vistas protected by City development plans will change as a result of the Project, including public views along streets and highways, mauka-makai view corridors, panoramic and significant landmark views from public places, views of natural features, heritage resources and other landmarks. Depending on the degree of view obstruction or blockage, some changes in view will be significant. Viewers' response to these changes will vary with their

exposure and sensitivity and depend on the alignment orientation, guideway and station height, and height of surrounding trees and buildings. View changes will be less notable in wider vista or panoramic views where the project elements are smaller components of the larger landscape. Generally, the project elements will not be dominant features in these views.

Design principles are identified in the Honolulu High-Capacity Transit Corridor Project Compendium of Design Criteria (RTD 2009m) and will be implemented in Final Design as mitigation measures to minimize visual effects. Specific design principles are listed in Section 4.8.3 and include: Overall Aesthetics, Station Design, Lighting and Landscaping criteria. These will be implemented in Final Design as mitigation measures to minimize visual effects. In addition, the Project will provide passengers with expansive views from several portions of the corridor by elevating riders above highway traffic, street trees, and low structures adjacent to the alignment

The visual effects on Honolulu's Downtown, including Mother Waldron Neighborhood Park and the Kakaako are discussed under the Kalihi to Ala Moana Center Landscape Unit. To minimize adverse visual effects and enhance visual and aesthetic opportunities, the City will consult with the Kakaako community for input on station design elements. Specifically, the Kakaako Station workshop will be held in conjunction with the Civic Center and Ala Moana Stations. In addition, design guidelines that establish a consistent design framework for the Project with consideration of local context will be developed and applied.

The visual effects on Irwin Park are not specifically mentioned in Table 4-10 of the Draft EIS. However, they are part of the larger views assessed in Viewpoint 15 in the Final EIS. The text on Page 4-88 of the Draft EIS has been refined in the Final EIS to clarify the visual impact analysis presented in the Draft EIS as described above.

As described in Section 4.2, Land Use in this Final EIS and expanded upon in the Honolulu High-Capacity Transit Corridor Project Land Use Technical Report (RTD 2008b), the Project is consistent with State and local plans

Preliminary effect determinations for Piers 10/11, Aloha Tower, Irwin Park, Dillingham Transportation Building, and Mother Waldron Neighborhood Playground documented in the Draft EIS were reevaluated in the Historic Effects Report: Honolulu High-Capacity Transit Corridor Project (RTD 2009d) issued by FTA on April 14, 2009. Analysis of the project's direct and indirect, and cumulative impacts to these properties, as described in the report, concluded that indirect, visual effects to the setting of Piers 10/11, Aloha Tower, and Irwin Park would not be adverse. However, the State Historic Preservation Officer (SHPO) did not concur with these findings and the FTA accepted adverse effect determinations on these resources. In the Historic Effects Report, impacts to the Dillingham Transportation Building and Mother Waldron Neighborhood Park were determined to be adverse due to differences in pre-existing integrity and character-defining features of each resource. Direct impacts to the Dillingham Transportation Building, including property acquisition, were also determined to be adverse. The SHPO concurred with these determinations.

Consultation with the SHPO subsequent to the Draft EIS resulted in revised Section 106 effects determinations to properties from no adverse effect to adverse effect—this includes

Chinatown Historic District. The Draft EIS stated that the impact to these properties would be de minimis. Since de minimis impact applies to historic properties that have a no adverse effect determination under Section 106, an avoidance alternative is included in Chapter 5 of this Final EIS for Chinatown Historic District.

Consultation with the SHPO has continued since release of the Draft EIS and the Historic Effects Report. This Final EIS summarizes all effect determinations to historic properties and Section 106 consultation as described in text and tables of Section 4.16, Archaeological, Cultural, and Historic Resources and Chapter 5. Mitigation of adverse impacts to historic resources is included in the Programmatic Agreement (Appendix H).

Within the Kakaako area, land uses adjacent to the alignment include two- and three-story walk-up apartments and commercial uses. Because Kakaako has been designated a redevelopment area, Kaiāulu 'o Kaka'ako Master Plan (HCDA 2008), changes in land uses to transit-oriented development are likely. This may result in a change in character along the alignment, especially near stations depending on local community input and what redevelopment plans administer. Substantial development has recently occurred in the neighborhood; several high-rise condominium developments have been built and additional residential and commercial development is planned. The elevated transit structure would not create a barrier to pedestrian, cyclist or automobile modes of travel.

Regarding your comment about public concerns specific to historic sites the following text from Section 8.2.3 of the Final EIS explains the process and the efforts taken both prior to the Draft document and since its publication. The lead agency is responsible for complying with Section 106 of the National Historic Preservation Act. Section 106 requires the lead agency to "accommodate historic preservation concerns with the needs of Federal undertakings through consultation among the agency official and other parties with an interest in the effects of the undertaking on historic properties..." [36 CFR 800.1(a)]. Although other parties are consulted for their input, the Federal agency has the authority to make all decisions. Extensive effort was made to identify, contact, and consult with groups entitled to be consulting parties relating to archaeological, cultural, and historic resources within the Area of Potential Effect (APE). The purpose of consultation was to identify archaeological, cultural, and historic resources and to discuss other issues relating to the Project's potential effects on such resources. Information was obtained from individuals and organizations likely to have knowledge of potential resources in the study corridor. A reasonable and good faith effort was made to identify Native Hawaiian organizations that might attach religious and cultural significance to historic properties in the APE, and they were given opportunities to discuss issues and concerns.

In addition to consultation with the State Historic Preservation Officer (SHPO), the City also consulted with organizations and agencies with concerns regarding archaeological, cultural, and historic areas. This consultation included Hawaiian civic clubs that may have an interest in the Project. Letters sent by the FTA initiated an ongoing consultation process with the following groups (Section 106 consulting parties) to identify resources, consider project effects, and develop mitigation to limit the adverse effects of the Project:

- *Advisory Council on Historic Preservation*

- *U.S. Navy (U.S. Naval Base Pearl Harbor)*
- *Historic Hawai'i Foundation*
- *National Park Service*
- *National Trust for Historic Preservation*
- *University of Hawai'i Historic Preservation Certificate Program*
- *American Institute of Architects*
- *Hawai'i Community Development Authority*
- *Office of Hawaiian Affairs*
- *O'ahu Island Burial Council*
- *Hui Malama I Na Kupuna O Hawai'i Nei*
- *Royal Order of Kamehameha*
- *The Ahahui Ka'ahumanu*
- *The Hale O Na Ali'i O Hawai'i*
- *The Daughters and Sons of Hawaiian Warriors*
- *Association of Hawaiian Civic Clubs—and 15 individual civic clubs*

Between July 28, 2009 and November 13, 2009, FTA and the City invited all consulting parties to participate in a series of meetings to develop the Programmatic Agreement (PA) (see Section 4.16, Archaeological, Cultural, and Historic, and Appendix H, Section 106 of the National Historic Preservation Act Programmatic Agreement). Appendix F includes copies of all Section 106 correspondence.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

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SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT10/09-336976

Mr. Mike Uechi
98-111 Kaahele Place
Aiea, Hawaii 96701

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Subject: Honolulu High-Capacity Transit Corridor Project
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June 11, 2010

RT10/09-336981

Ms. Michelle Matson
3931 Gail Street
Honolulu, Hawaii 96815

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The guideway and some stations will partially block mauka-makai public views from streets that intersect the alignment. DTS will coordinate with the Department of Planning and

Permitting (DPP) to identify the particular needs of each view; however, changes to some views will be unavoidable. Depending on the degree of view obstruction or blockage, some view changes will be substantial. The viewer's response to this change will vary with exposure and sensitivity and depend on the alignment orientation, guideway and station height, and height of surrounding trees and/or buildings.

The following mitigation framework (see Section 4.8.3 Environmental Consequences, in this Final EIS [Visual and Aesthetic Conditions]) will be included with the Project to minimize negative visual effects and enhance the visual and aesthetic opportunities that it creates:

- *Develop and apply design guidelines that will establish a consistent design framework for the Project with consideration of local context.*
- *Coordinate the project design with City TOD planning and DPP.*
- *Consult with the communities surrounding each station for input on station design elements.*
- *Consider specific sites for landscaping and trees during the final design phase when plans for new plantings will be prepared by a landscape architect. Landscape and streetscape improvements will serve to mitigate potential visual impacts.*

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The visual effects on Honolulu's Downtown, including Mother Waldron Neighborhood Park and the Kakaako are discussed under the Kalihi to Ala Moana Center Landscape Unit. To minimize adverse visual effects and enhance visual and aesthetic opportunities, the City will consult with the Kakaako community for input on station design elements. Specifically, the Kakaako Station workshop will be held in conjunction with the Civic Center and Ala Moana Stations. In addition, design guidelines that establish a consistent design framework for the Project with consideration of local context will be developed and applied.

Preliminary effect determinations for Piers 10/11, Aloha Tower, Irwin Park, Dillingham Transportation Building, and Mother Waldron Park documented in the Draft EIS were reevaluated in the Historic Effects Report: Honolulu High-Capacity Transit Corridor Project (RTD 2009d) issued by FTA on April 14, 2009. Analysis of the project's direct and indirect, and cumulative impacts to these properties, as described in the report, concluded that indirect, visual effects to the setting of Piers 10/11, Aloha Tower, and Irwin Park would not be adverse. However, the State Historic Preservation Division (SHPD) did not concur with these findings and

the FTA accepted adverse effect determinations on these resources. In the Historic Effects Report, impacts to the Dillingham Transportation Building and Mother Waldron Park were determined to be adverse due to differences in pre-existing integrity and character-defining features of each resource. Direct impacts to the Dillingham Transportation Building, including property acquisition, were also determined to be adverse. The SHPD concurred with these determinations. Consultation with the SHPD has continued since release of the Draft EIS and the Historic Effects Report. Final determinations of effect and coordination details are presented in this Final EIS, Section 4.16. Mitigation of adverse impacts to historic resources is included in the Programmatic Agreement (Appendix H).

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

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SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-332667

Mr. Bart Travaglio
400 Hobron Lane, #3506
Honolulu, Hawaii 96815

Dear Mr. Travaglio:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

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Chapter 2 of the Final EIS summarizes the alternatives screening and selection process. Beginning in the fall of 2005, an initial screening process considered alternatives identified through previous transit studies, a field review of the study corridor, an analysis of current population and employment data for the study corridor, a literature review of technology modes, ongoing work completed as part of the Oahu Regional Transportation Plan 2030 (ORTP) prepared by the Oahu Metropolitan Planning Organization (OahuMPO) (OahuMPO 2007), and public and agency comments received during the formal Alternatives Analysis scoping process.

The screening process is documented in the Honolulu High-Capacity Transit Corridor Project Alternatives Screening Memorandum (DTS 2006a). Three scoping meetings were held during the screening process in December 2005, which included a presentation of initial alternatives to the public, interested agencies, and officials to receive comments on the Purpose

and Need, alternatives, and scope of the Alternatives Analysis. Refinements were made to the alternatives based on the public input during scoping.

After completion of screening in the winter of 2006, the following alternatives were studied in the Alternatives Analysis: No Build Alternative, Transportation System Management (TSM) Alternative which emphasized using buses as the primary improvement to the transportation system, Managed Lane Alternative, and the Fixed Guideway Alternative. After review of the Alternatives Analysis Report and consideration of public comments, the City Council identified a fixed guideway transit system extending from Kapolei to UH Manoa with a connection to Waikiki as the Locally Preferred Alternative. This identification, which eliminated the TSM and Managed Lane Alternatives from further consideration, became Ordinance 07-001 on January 6, 2007. The TSM Alternative did not have a significant beneficial effect and performed very much like a No Build Alternative because buses are still affected by overall roadway congestion and could not meet the requirements of the Project's Purpose and Need. The NEPA process considered a range of alternatives that was consistent with the identified Locally Preferred Alternative. As discussed in Section 2.2, there were no alternatives that had not been previously studied and eliminated for good cause that would satisfy the Purpose and Need at less cost, with greater effectiveness, or less environmental or community impact.

In addition, TheBus is currently purchasing more fuel-efficient buses, which will help reduce energy usage. However, like diesel, the propane in your recommendation has to be imported to Hawaii and is not a renewable resource.

Although noted, your comment regarding repurposing military nuclear reactors is outside the scope of a transit project.

Lastly, the planned electricity generation capacity on Oahu will be sufficient to support the transit system. It will require less than 2% of the power generation on the island and HECO has stated they can readily accommodate the increased demand within their current program for energy production. Over time, the benefit of electricity is that much of it can be generated from renewable sources.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-332671

Mr. Kevin Killeen
1750 Kalakaua Avenue, #3-3179
Honolulu, Hawaii 96826

Dear Mr. Killeen:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

As stated in Chapter 3 of the Final EIS, "Adding substantial passenger capacity with more buses is not feasible in some key locations along the system because of roadway capacity constraints. Choke points occur in Downtown Honolulu during the a.m. peak period, especially at the merger of North Beretania, North King, and Liliha Streets, and Dillingham Boulevard and along Hotel Street. King Street has been used to introduce new service in recent years due to the capacity limitation of Hotel Street; however, choke points occur at the Chinatown bus stops and at the Punchbowl Street and King Street stops. Buses often must wait to move into an open and safe boarding position. Continuing to add additional service to King Street without major physical improvements would add to the gridlock in this corridor, deteriorate transit service, and complicate pedestrian and traffic safety issues. In the p.m. peak period, choke points occur along Beretania Street, Hotel Street, Nimitz Highway, and Ala Moana Boulevard in the Downtown area. Several routes, including CountryExpress! Routes C, D, and E are

projected to be overloaded in 2030. Increasing frequency would require headways at five minutes or less. Further, the downtown street network cannot support the number of buses that would be required to meet projected demand."

Bus service will be enhanced and modified to coordinate with the rail system. Some existing bus routes will be altered or eliminated to reduce duplication of services. Buses removed from service in the study corridor will be shifted to serve other parts of the island. Certain local routes will be rerouted to provide frequent and reliable connections to the nearest rail station. A description of existing and future bus routes, including frequency, is included in Appendix D of the Final EIS.

Conditions on the highway will be worse in 2030 under any circumstances and regardless of which solution is applied. The travel demand forecasting model uses guidelines established by FTA. According to modeling conducted for the Project, the fixed guideway system will relieve traffic congestion by 18 percent (Table 3-14 in the Final EIS) versus without the Project. Conditions will be substantially better with the fixed guideway than with any of the other potential solutions studied.

The Sierra Club's national umbrella organization supports rail transit, as stated in Project publications. We recognize that the local chapter of the Sierra Club differs in its opinion from the national organization and asked for certain considerations. The local chapter of the Sierra Club has submitted their comments regarding the Project, and we will address those comments and concerns as appropriate.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

DEPARTMENT OF TRANSPORTATION SERVICES

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-332672

Mr. Richard Kawano
1420 Victoria Street, #803
Honolulu, Hawaii 96822

Dear Mr. Kawano:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraph addresses your comments regarding the above-referenced submittal:

Your support for a Fixed Guideway Transit Alternative has been noted. While each of the alternatives discussed in the Draft EIS includes trade-offs between benefits and impacts, the Airport Alternative from East Kapolei to Ala Moana has been selected as the Preferred Alternative as described above. As compared to the alternatives discussed in the Draft EIS, the Airport Alternative will carry the most passengers, provide the greatest transit-user benefits, and result in the fewest vehicle hours of delay. It will provide access to employment centers at Pearl Harbor Naval Base and Honolulu International Airport and will serve the Salt Lake neighborhood with connecting bus service. Of the three Build Alternatives addressed in the Draft EIS, the Airport Alternative will have slightly less impacts to the natural and built environment analyzed in the Draft EIS. During the public comment period on the Draft EIS, the public overwhelmingly supported the Airport Alternative. Of the comments that specifically supported one of the alternatives, more than 75 percent were in support of the

Airport Alternative. For more information this selection is discussed in Section 2.4 of the Final EIS. Since publication of the Draft EIS, design has been advanced, further analysis has been completed, and information has been added in response to comments on the Draft EIS and agency coordination. The Final EIS discusses the process that was used to select the Preferred Alternative, how comments were considered in the decision-making process, impacts and mitigation commitments.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/090-332675

Ms. Eve Anderson
P.O. Box 25550
Honolulu, Hawaii 96825

Dear Ms. Anderson:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

A comment period of 45 days is mandated for public review and comment on a Draft EIS. The comment period duration was extended by 30 days to February 6, 2009, for a total duration of 75 days. This period was longer than the 45 to 60 days typical for U.S. Department of Transportation Draft EIS documents. The document was also released to the public and reported on by local newspapers prior to its official notice of release, thereby allowing extra time for individuals to make their comment(s) on the document.

The City held five public hearings throughout the Project study area in December 2008. Project consultant and City staff members were available to answer questions and take comments. In addition, project staff will continue outreach activities throughout the community during the length of the Project. Information about the Project is available at www.honolulutransit.org.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-332686

Mr. Robert Crone
218 Kuupua Street
Kailua, Hawaii 96734

Dear Mr. Crone:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

Rail transit systems with opening date populations similar to Honolulu's current population include: Utah Transit Authority's TRAX rail system, Edmonton Transit System (ETS), Calgary C-Train, Portland's MAX rail system, and Vancouver's Sky Train.

The Alternatives Screening Memorandum (DTS 2006a) recognized the visually sensitive areas in Kakaako and Downtown Honolulu, including the Chinatown, Hawaii Capital, and Thomas Square/Academy of Arts Special Design Districts. To minimize impacts on historic resources, visual aesthetics, and surface traffic, the screening process considered more than 15 different combinations of tunnel, at-grade, or elevated alignments between Iwilei and Ward Avenue. As identified on pages 4-23 and 4-24 of the Screening Memorandum, four different alignments through Downtown Honolulu were advanced for further analysis, including an at-

grade portion along Hotel Street, a tunnel under King Street, and elevated guideways along Nimitz Highway and Queen Street.

The Alternatives Analysis Report (DTS 2006b) evaluated the alignment alternatives based on transportation and overall benefits, environmental and social impacts, and cost considerations. The report found that an at-grade alignment along Hotel Street would require the acquisition of more parcels and affect more burials than any of the other alternatives considered. The alignment with a tunnel under King Street through Downtown, in addition to the environmental effects such as impacts to cultural resources, reduction of street capacity, and property acquisition requirements of the at-grade section, would cost over $500 million more than the least expensive alternative.

The Project's purpose is "to provide high-capacity rapid transit" in the congested east-west travel corridor. The need for the Project includes improving corridor mobility and reliability. The at-grade alignment would not meet the Project's Purpose and Need because it could not satisfy the mobility and reliability objectives of the Project. Some of the technical considerations associated with an at-grade versus elevated alignment through Downtown Honolulu include the following:

- ***System Capacity, Speed, and Reliability**: The short, 200-foot blocks (or less) in Downtown Honolulu would permanently limit the system to two-car trains to prevent stopped trains from blocking vehicular traffic on cross-streets. Even with transit signal priority, the at-grade speeds would be slower and less reliable than an elevated guideway. Under ideal circumstances, the capacity of an at-grade system could reach 4,000 passengers per hour per direction, assuming optimistic 5 minute headways. Based on travel forecasts, the Project will need to carry approximately 8,000 passengers by 2030. Moreover, the system can be readily expanded to carry over 25,000 in each direction by reducing the interval between trains (headway) to 90 seconds during the peak period. To preserve a comparable system capacity, speed, and reliability, an at-grade alignment would require a fenced, segregated right-of-way that would eliminate all obstacles to the train's passage, such as vehicular, pedestrian, or bicycle crossings.*

- ***Mixed-Traffic Conflicts**: With the planned three-minute headways, the short cycle of traffic lights would affect traffic flow and capacity of cross-streets. Furthermore, there would be no option to increase the capacity of the system by reducing the headway to 90 seconds.*

- ***Construction Impacts**: An at-grade system would consume two or more lanes of existing roadway, resulting in increased congestion or requiring that additional businesses or homes be taken to widen the roadway through Downtown. This would also have greater construction impacts and potentially affect cultural practices and burials to a greater extent than the placement of discrete column foundations for an elevated structure.*

Because it is not feasible for an at-grade system through Downtown to move passengers rapidly and reliably without significant detrimental effects on other transportation system elements (e.g., the highway and pedestrian systems, safety, reliability, etc.), an at-grade system

would have a negative systemwide impact that would reduce ridership throughout the system. The at-grade system would not meet the Project's Purpose and Need and, therefore, does not require additional analysis.

Because of project requirements for completely grade-separated operations to avoid vehicle and pedestrian conflicts, the system can be constructed with third-rail technology, which eliminates the need for overhead lines.

Section 6.3 of the Final EIS describes the financial resources anticipated to be needed to pay for the capital costs of the Project. Capital costs of the Project, including finance charges, are expected to be fully paid for by a combination of FTA Section 5307 and FTA Section 5309 New Starts funds from the Federal government and revenues from the County's General Excise and Use Tax (GET) Surcharge from 2007 through 2022 on Oahu. These funding assumptions are subject to a number of risks and uncertainties, as described in Section 6.6.

While the elevated rail has higher capital costs than an at-grade system, it provides more reliable service and shorter travel times, with less interference with and impact on auto traffic. The proposed sources of funding to pay for this service are documented in the Final EIS.

Section 6.4 of the Final EIS describes the financial resources anticipated to be needed to pay for ongoing operating and maintenance costs. Operating and maintenance costs will be paid for from the same sources currently used for TheBus: Federal funding, fare revenues, and City revenues from the General and Highway Funds. These funding assumptions are subject to a number of risks and uncertainties, as described in Section 6.6.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Honolulu High-Capacity Transit Corridor Project

Draft Environmental Impact

Statement/Section 4(f) Evaluation

Public Meeting and Hearing

December 9, 2008

Salt Lake District Park

1159 Ala Lilikoi Place

Honolulu, Hawaii

6:30 p.m. - 8:00 p.m.

REPORTER'S TRANSCRIPT

OF

PRIVATE TESTIMONIALS

BEFORE: ELSIE TERADA, CSR NO. 437
Certified Shorthand Reporter

I N D E X

Page

SPEAKERS:

Bob Kilthau 3
1310 Haloa Drive
Honolulu, Hawaii 96818

Herbert T.C. Loo 4
1569 Onipaa Street
Honolulu, Hawaii 96819

Lennard Pepper 5
1352 Olino Street
Honolulu, Hawaii 96818

Ruth Boyett 8
4336 Laakea Street
Honolulu, Hawaii 96818

Dennis Egge 9
2920 Ala Ilima Street, #703
Honolulu, Hawaii 96818

Kenneth Tsumoto 10
3434 Ala Ilima Street
Honolulu, Hawaii 96818

BOB KILTHAU: We're residents of Foster Village, and we think that the Salt Lake route is pretty dumb because it's going to go by all the schools, Makalapa Elementary, Radford High School, and it's not going to help people in Foster Village. It's just going to make noise for us, and while they're building it, it's going to cause a lot of trouble for traffic to get in and out of Foster Village, and we think it should go along Kam Highway, so it goes by the Pearl Harbor Complex, and the Hickam Air Force Base, and the airport. That makes a lot more sense to me.

Oh, yeah, I said the schools. Yeah, Radford High School and Makalapa Elementary School are going to be bothered by this thing, during the building and, also, it's going to be making a lot of noise for those schools, when the trains go through. And it makes a lot more sense to use Kam Highway. That's where the people -- I've talked to several people who work at Pearl Harbor, they said they'd rather have it go to Pearl Harbor, along Kam Highway. That's about it.

-oOo-

HERBERT T.C. LOO: I'd like to testify that this project should have been built many years ago, and it is a sad situation when we still have these few people bringing up this "if" and "or" about this particular project, which is long overdue. Of course, probably a lot of them haven't traveled to see other parts of the world, to see how the transit of people moving around by the millions are using this type of transportation, economically, safe, and, best of all, you get there in the least amount of time. And I say that we should proceed with this, with the fastest means possible and get it done, and then you'll know and appreciate what a real transit system is like.

I lived in New York City for seven years, and you'd just imagine if they didn't have the subway there. Boy, a million people travel on that every day, and it's a snap. Just think if we had this 20 years ago, boy, everybody would be less humbug with this traffic mess that we have

now. That's my testimony and I hope we get this thing built as soon as possible.

-oOo-

LENNARD PEPPER: I will not duplicate much of what I testified in public. However, in order to make sure that certain important things get recorded, I'd like to say that in the EIS, I think it's in 1-6, there were some major facilities left out. These include the Bougainville industrial area, which is an area of both retail and wholesale facilities, and we'll have a Target, as of March of next year. The Moanalua Shopping Center, the Stadium Marketplace -- the Pearl Harbor commissary and the Public Work Center, those are both military -- so those are left out.

In addition, I feel that the document itself is kind of static and does not recognize many changes which will occur in this community by 2030. It is an aging community, it is a community that will become poorer because the infrastructure is aging. In fact, Foster Village was begun in

1957, so it will be 80 years old, roughly 80 years old by 2030. Salt Lake, I think, was started over 30 years ago. It will be an aging infrastructure and an aging population. They, the aging population, will need public transportation.

The document also does not recognize changes which I anticipate in the public school system. There are five public schools along the route, at least two of them high schools. They are likely to become magnet schools by 2030, schools which specialize in one particular kind of instruction; for example, drama or English, and kids from all over the city will be coming to those schools because they will specialize in that particular function. They'll need public transportation. This is all in conjunction with my support for the Salt Lake route.

In addition to that, the EIS does not seem to have, at least the part I read, does not have clear indication of what the feeder system, the feeder bus system is going to look like. I think that's an important thing that should be included in the final EIS.

It also is not very clear about the property acquisitions which will be necessary. It

was my understanding that many properties would require only a very small strip of land be taken. When the opponents talk about this Salt Lake route, they talk as if it's going to be the whole property is going to be taken instead of, say, three feet or two feet from a yard, or carport or something.

The other thing that I guess I did not make as firmly as I should have, during the public testimony, was that the Salt Lake route enables a seven-day-a-week system serving the population. Going to church, going to Aunty, going to soccer games. Whereas the airport route is basically a five-day-a-week, "go to work and come home" system.

Something I said in the public hearing, when we were talking about starting this whole thing, was taken sort of as a joke, but it wasn't meant as a joke. One of the social benefits of this thing would be getting drunks off the road. Some people who like to drink to excess will take the public transportation rather than drive drunk, and I think that's a valuable and important social benefit.

So, in summary, the social benefits of

the system are not adequately dealt with, in the EIS, as far as I'm concerned, and they matter at least as much as getting people to work and at least as much as the cost of the system. That will do it. Thank you.

-oOo-

RUTH BOYETT: I think a static lane would look much nicer to go down Kam Highway and Nimitz. I think the view would be much nicer. I live on Salt Lake Boulevard. I don't want to have it pass on my front yard. That's all.

-oOo-

DENNIS EGGE: I believe that we should build out from Ala Moana Center or the Honolulu Convention Center area out to Middle Street, to take care of all the congestion in town. And from that point, west, I think things can be taken care of by existing TheBus and surface transportation, but I think things really get jammed up, the closer you get into town. Like one guy tonight said, what used to be a ten-minute ride from Salt Lake to Queen's Hospital is now 90 minutes. So we won't be able to tolerate that much longer. If

the Mayor would consider building out from Ala Moana Center, shopping center area, which is a major transit-oriented development at the moment, out to the Middle Street terminal, then I think they will have something. Thank you.

-oOo-

KENNETH TSUMOTO: They should get one committee and just vote on it, you know, and include a monorail one place. If they already agreed on Salt Lake, then why are they going over and over again? You know what I'm saying? Just get one panel of people just to decide it. Instead of going to -- you know what I'm saying -- going to one place to, basically, another place, that, I cannot see. Because remember what happened to the Aloha Stadium and the lawsuit?

The engineers were suing the Aloha Stadium, and the engineers on their side always answered the question. But when the other side bring up the question, famous answer, "I don't remember." So what I'm just saying is that this is the same thing what's happening now. So, you know, that's the ball game.

-oOo-

STATE OF HAWAII)
) ss.
COUNTY OF HONOLULU)

I, Elsie Terada, Certified Shorthand Reporter, Certificate No. 437, for the State of Hawaii, hereby certify:

I am the person that stenographically recorded the proceedings.

The foregoing transcript is a true record of said proceedings.

Dated this 26th day of December, 2008, in Honolulu, Hawaii.

ELSIE TERADA, CSR NO. 437
Notary Public, State of Hawaii

My Commission Expires: 4-07-2010

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, 3RD FLOOR
HONOLULU, HAWAII 96813
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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-332689

Mr. Bob Kilthau
1310 Haloa Drive
Honolulu, Hawaii 96818

Dear Mr. Kilthau:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

Your preference for the Airport Alternative has been noted. While each of the alternatives discussed in the Draft EIS includes trade-offs between benefits and impacts, the Airport Alternative from East Kapolei to Ala Moana has been selected as the Preferred Alternative as described above. As compared to the alternatives discussed in the Draft EIS, the Airport Alternative will carry more passengers, provide the greatest transit-user benefits, and result in the fewest vehicle hours of delay. It will provide access to employment centers at Pearl Harbor Naval Base and Honolulu International Airport and will serve the Salt Lake neighborhood with connecting bus service. Of the three Build Alternatives addressed in the Draft EIS, the Airport Alternative will have slightly lower impacts to the natural and built environment analyzed in the Draft EIS. During the public comment period on the Draft EIS, the public overwhelmingly supported the Airport Alternative. Of the comments that specifically supported one of the alternatives, more than 75 percent were in support of the Airport Alternative. For more information this selection is discussed in Section 2.4 of the Final EIS. Since publication of the Draft EIS, design has been advanced, further analysis has been completed, and information has been added in response to comments on the Draft EIS and agency coordination. The Final EIS

discusses the process that was used to select the Preferred Alternative, how comments were considered in the decision-making process, impacts and mitigation commitments.

For schools and other noise-sensitive places that do not have nighttime, sleep activities, the FTA Transit Noise and Vibration Impact Assessment compares the existing maximum-hour noise level to the maximum-hour noise that the transit line will produce by itself. For the Salt Lake Alternative, between Aloha Stadium and the Ala Lilikoi Stations, the existing current maximum-hour Leq noise level at the school ranges from 60 to 65 dBA. A project noise level of 63 dBA or above would be an impact. The Project is predicted to have a maximum-hour Leq noise level of 51 dBA, and maximum-hour noise levels will stay the same.

As stated in Section 4.10.3 of the Final EIS, the Project will cause no severe noise impacts. Moderate impacts will occur at upper floors of a few high-rise buildings (as shown in Table 4-18 in the Final EIS). With the recommended mitigation in place (sound absorbing material and wheel skirts on the trains), the noise analysis indicates that the new noise generated by the Project will be lower than the existing noise levels in most places.

The project design includes an integrated noise-blocking parapet wall at the edge of the guideway structure that extends three feet above the top of the rail. The parapet wall will substantially reduce ground-level noise.

Wheel skirts will increase the benefit from the parapet wall at locations above the elevation of the track. The use of sound-absorptive materials below the tracks in the areas that will experience moderate noise impacts will reduce the Project noise levels from the upper floors to below the impact level. Once the Project is operating, noise levels will be re-measured to confirm that there are no noise impacts from the Project.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, 3RD FLOOR
HONOLULU, HAWAII 96813
Phone: (808) 768-8305 • Fax: (808) 768-4730 • Internet: www.honolulu.gov

MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-332694

Mr. Herbert T.C. Loo
1569 Onipaa Street
Honolulu, Hawaii 96819

Dear Mr. Loo:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraph addresses your comments regarding the above-referenced submittal:

Your preference for a Fixed Guideway Transit Alternative has been noted. The Project is proceeding as quickly as practical, as illustrated in the schedule presented in Chapter 2 of the Final EIS.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-332695

Mr. Lennard Pepper
1352 Olino Street
Honolulu, Hawaii 96818

Dear Mr. Pepper:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

To address your first comment, the Major Activity Centers in the study corridor listed in Figure 1-4 are within one-half mile of the guideway alignment. The list is not meant to be an exhaustive list of all businesses.

In addition, the planning year of the Project is 2030, consistent with the OahuMPO Regional Transportation Plan. Anticipated change, including aging and increasing numbers of Oahu residents, is a key part of the Project's Purpose and Need. According to the Executive Summary, the Project will provide reliable mobility in areas of the corridor where people of limited income and an aging population live and will serve rapidly developing areas at the Ewa end of the corridor.

Your preference for the Salt Lake Alternative has been noted. While each of the alternatives discussed in the Draft EIS includes trade-offs between benefits and impacts, the Airport Alternative from East Kapolei to Ala Moana has been selected as the Preferred Alternative as described above. As compared to the alternatives discussed in the Draft EIS, the Airport Alternative will carry the most passengers, provide the greatest transit-user benefits, and result in the fewest vehicle hours of delay. It will provide access to employment centers at Pearl Harbor Naval Base and Honolulu International Airport and will serve the Salt Lake neighborhood with connecting bus service. Of the three Build Alternatives addressed in the Draft EIS, the Airport Alternative will have slightly less impacts to the natural and built environment analyzed in the Draft EIS. During the public comment period on the Draft EIS, the public overwhelmingly supported the Airport Alternative. Of the comments that specifically supported one of the alternatives, more than 75 percent were in support of the Airport Alternative. For more information this selection is discussed in Section 2.4 of the Final EIS. Since publication of the Draft EIS, design has been advanced, further analysis has been completed, and information has been added in response to comments on the Draft EIS and agency coordination. The Final EIS discusses the process that was used to select the Preferred Alternative, how comments were considered in the decision-making process, impacts and mitigation commitments.

Section 4.4 of the Final EIS discusses acquisitions and Appendix B of the Draft EIS and Appendix C of the Final EIS show each parcel. In addition, Table 4-4 in the Final EIS shows how many acquisitions are full acquisitions (the entire parcel) and how many are partial acquisitions. Partial acquisitions will not require a business or resident to be displaced and relocated.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

May 21, 2010

RT9/09-332696

Ms. Ruth Boyett
4336 Laakea Street
Honolulu, Hawaii 96818

Dear Ms. Boyett:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraph addresses your comments regarding the above-referenced submittal:

Your preference for the Airport Alternative has been noted. While each of the alternatives discussed in the Draft EIS includes trade-offs between benefits and impacts, the Airport Alternative from East Kapolei to Ala Moana has been selected as the Preferred Alternative as described above. As compared to the alternatives discussed in the Draft EIS, the Airport Alternative will carry the most passengers, provide the greatest transit-user benefits, and result in the fewest vehicle hours of delay. It will provide access to employment centers at Pearl Harbor Naval Base and Honolulu International Airport and will serve the Salt Lake neighborhood with connecting bus service. Of the three Build Alternatives addressed in the Draft EIS, the Airport Alternative will have slightly less impacts to the natural and built environment analyzed in the Draft EIS. During the public comment period on the Draft EIS, the public overwhelmingly supported the Airport Alternative. Of the comments that specifically supported one of the alternatives, more than 75 percent were in support of the Airport Alternative. For more

information this selection is discussed in Section 2.4 of the Final EIS. Since publication of the Draft EIS, design has been advanced, further analysis has been completed, and information has been added in response to comments on the Draft EIS and agency coordination. The Final EIS discusses the process that was used to select the Preferred Alternative, how comments were considered in the decision-making process, impacts and mitigation commitments.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Issuance of the Record of Decision under NEPA and acceptance of the Final EIS by the Governor of the State of Hawaii are the next anticipated actions and will conclude the environmental review process for this Project.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

DEPARTMENT OF TRANSPORTATION SERVICES

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-332699

Mr. Dennis Egge
2920 Ala Ilima Street, #703
Honolulu, Hawaii 96818

Dear Mr. Egge:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

As described in Section 2.5.10 of the Final EIS, to support phased opening of the system, the first construction phase must be connected to a maintenance and storage facility, which requires considerable land. The first phase of the Project must be connected to the maintenance and storage facility because, in addition to maintenance of equipment and ongoing operations, the maintenance and storage facility houses the main control center for the entire Project, and the required testing and operation of the system could not be completed without access to it. No location has been identified closer to Downtown with sufficient available land to construct a maintenance and storage facility. The Project will be constructed in phases to accomplish the following:

- *Match the anticipated schedule for right-of-way acquisition and utility relocations*
- *Reduce the time that each area will experience traffic and community disturbances*

- *Allow for multiple construction contracts with smaller contract size to promote more competitive bidding*
- *Match the rate of construction to what can be maintained with local workforce and resources*
- *Balance expenditure of funds to minimize borrowing*

The portion of the corridor Ewa of Pearl Highlands is less developed than the areas Koko Head. Right-of-way can be obtained more quickly; therefore, overall project construction can begin earlier, resulting in lower total construction costs. Construction is planned to continue uninterrupted Koko Head from Pearl Highlands to Aloha Stadium, then Kalihi, and finally to Ala Moana Center.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-332700

Mr. Kenneth Tsumoto
3434 Ala Ilima Street
Honolulu, Hawaii 96818

Dear Mr. Tsumoto:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraph addresses your comments regarding the above-referenced submittal:

As described in Chapter 2 of the Final EIS, monorail technology was evaluated and eliminated. While each of the alternatives discussed in the Draft EIS includes trade-offs between benefits and impacts, the Airport Alternative from East Kapolei to Ala Moana has been selected as the Preferred Alternative as described above. As compared to the alternatives discussed in the Draft EIS, the Airport Alternative will carry the most passengers, provide the greatest transit-user benefits, and result in the fewest vehicle hours of delay. It will provide access to employment centers at Pearl Harbor Naval Base and Honolulu International Airport and will serve the Salt Lake neighborhood with connecting bus service. Of the three Build Alternatives addressed in the Draft EIS, the Airport Alternative will have slightly less impacts to the natural and built environment analyzed in the Draft EIS. During the public comment period on the Draft EIS, the public overwhelmingly supported the Airport Alternative. Of the comments that specifically supported one of the alternatives, more than 75 percent were in support of the

Airport Alternative. For more information this selection is discussed in Section 2.4 of the Final EIS. Since publication of the Draft EIS, design has been advanced, further analysis has been completed, and information has been added in response to comments on the Draft EIS and agency coordination. The Final EIS discusses the process that was used to select the Preferred Alternative, how comments were considered in the decision-making process, impacts and mitigation commitments.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Honolulu High-Capacity Transit Corridor Project

Draft Environmental Impact

Statement/Section 4(f) Evaluation

Public Meeting and Hearing

December 9, 2008

Salt Lake District Park

1159 Ala Lilikoi Place

Salt Lake, Hawaii

6:00 - 8:00 p.m.

REPORTER'S TRANSCRIPT

OF

PUBLIC HEARING

BEFORE: NANCY P. BLANKENSHIP, CSR NO. 459

Certified Shorthand Reporter

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AR00003869

Honolulu, Hawaii (808) 524-2090

HEARING OFFICER HAMAYASU: Good Evening, I am Toru Hamayasu, the Second Deputy Director of the City and County of Honolulu Department of Transportation Services. I am the hearing officer for this public hearing for the Draft Environmental Impact Statement for the Honolulu High-Capacity Transit Corridor Project.

The purpose of this public hearing is to collect comments related to the proposed transit project regarding: the draft EIS; Section 106 of the National Historic Preservation Act process; Section 4(f) of the U.S. Department of Transportation Act; right-of-way acquisition; and floodplains affected by the project.

Public input can be made in four ways: 1) public spoken testimony to me here in the public hearing room; 2) if you do not wish to speak in public, an individual spoken testimony for the record can be made to the hearing recorder who is near the public involvement station in the public information area; 3) written testimony may be deposited in the black comment box at the meeting, delivered to the Department of Transportation Services office, or mailed or faxed (808) 523-4730 to DTS by January 7, 2009; and finally, 4) testimony can be submitted

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online by January 7, 2009 at www.honolulutransit.org.

All comments and responses will be
18:05:59 included in the Final EIS. Revisions to the EIS will be made as appropriate based on comments. The hearing procedures are as follows:

1. Elected and public officials will be heard first. Persons desiring to testify should register at the entrance to the hearing room, and will be called in order of registration.

2. Any individual may appear and speak for him or herself, or if duly authorized for any
18:06:29 local civic group, organization, club or association, subject to the rules provided herein. Speakers should give their name. If representing a group, this information should also be given.

3. Speakers must limit their statements to three minutes. Additional prepared statements or literature pertaining to the project may be submitted
18:06:55 at this hearing or by 4:30 p.m., January 7, 2009 to Department of Transportation Services. These statements will be made part of the official record if they include a legible name and address.

4. For these hearings, all statements, oral or written, should be directed to the hearing officer and must be related to the subject matter of

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the hearing.

5. Each person speaking before the audience must do so at the floor microphone. We will call testifiers in groups of three to facilitate orderly progress. Please ensure you are in the hearing room at the time your name is called. A court stenographer will record and transcribe the hearing proceedings. If required, I will announce any other specific rules governing this hearing.

6. As part of this public hearing process, the Honolulu High-Capacity Transit Project team is not allowed to respond to any questions or concerns raised by the speaker. The project team will be available to address your questions in the project information area outside of this hearing venue.

It is now 6:09 p.m. At this time I would like to begin the public testimony. The first testifier is Michael Burton followed by Robert Webb and Douglas Torres.

MR. BURTON: Hi. Good evening. I just wanted to --

HEARING OFFICER HAMAYASU: Please state your name first.

MR. BURTON: My name is Michael Burton. I live here in the community. I work at the airport. Okay. I just wanted to say that I do support the rail project, however, the latest discussions that I've been hearing was changing the route, and I think it's a waste of public's money to route the rail down from Pearl Harbor toward the airport. My rationale is because that it's bypassing densely populated neighborhoods, such as Foster Village here at Salt Lake, and I think public's money could be better used by routing it down Salt Lake rather than going toward the airport.

Secondly, in that route toward the airport you're going to be intruding on a lot of military property, which means you're going to have to get third-party permitting and whatever that process might be to get the okay to build your infrastructure on their property. And, therefore, I think it's going to be -- that's going to create a lot of delays in the forward motion of this project.

Routing it down Salt Lake, because it is a lot of city and county land along that Salt Lake route there will be very little problems as far as intruding on personal property and federal property and what have you in that area. Like I said, it will

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benefit the Foster Village community as well as Salt Lake community. That's it.

HEARING OFFICER HAMAYASU: Thank you. Next speaker is Robert Webb.

MR. WEBB: First I would like to thank you for allowing me to express my viewpoint on the issue.

18:11:00

HEARING OFFICER HAMAYASU: Please state your name first.

MR. WEBB: My name is Robert Webb. I'm a 28-year resident of Salt Lake.

I Robert Webb oppose the Salt Lake route for the following reasons:

Number one, I feel very strongly the schools that would be involved are the Radford High, Aliamanu elementary and middle schools should not be uprooted in any way, shape or form. I feel the

18:11:27

students should not encounter any difficulty in their learning when a link is being built and when it's open for service. And for the same reason I feel the Salt Lake Library should not be touched, okay.

Thirdly, I -- you might think I'm a little paranoid or what, but I don't care. I think that if we have a substation in a highly, densely

18:12:00

populated area, we are going to have a real social problem on our hands and that is a lot of homeless people will take shelter at a substation, and I'll be dammed if some of our kids are getting woo'd by types like that and they might get involved in some kind of

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illicit activity like drug pushing, et cetera, et cetera. Okay.

I also feel strongly that despite the overcrowdings of parking in the Aliamanu district it is doubtful there will be enough people that abandon their driving to utilize the rail. I'm sure that it can be argued. The rail may be still an option for those who are currently obtaining bus service presently. I can see that segment of the population which would favor the rail here in Salt Lake.

I also feel strongly that I -- excuse me -- that many people who probably -- and don't feel insulted when I say a thing like this -- many people who probably have not lived for an extensive period of time on the mainland or in foreign countries don't know the experience of being too close to steel wheel on steel rail. It can get pretty noisy, although studies have been shown to show that it shouldn't be a problem, but I still have my doubts about decibel levels and the impact on people and what connection it might have with sleep deprivation.

And I feel last but not least because of the noise level and condemnation of residential and business property --

(Buzzer sounds.)

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HEARING OFFICER HAMAYASU: Please summarize.

MR. WEBB: Okay. In conclusion, I feel that the Salt Lake linkage would create more
18:13:57 disruption to the quality of life and incur more social cost than what the community is willing to bear. Thank you.

HEARING OFFICER HAMAYASU: Next speaker is Douglas Torres followed by T. K. Chun and Thomas Strout.

MR. TORRES: My name is Doug Torres, and I'm a resident of Salt Lake Boulevard. We, the residents and community of Salt Lake Boulevard are against the rail down Salt Lake Boulevard. As
18:14:28 indicated, there will be only two stations along the Salt Lake Boulevard, one at the stadium and one at Ala Lilikoi Street.

Almost the entire length of the boulevard it's only for rail to pass through; no stops. How can the people who voted for it justify all the homes and lives that will be affected by this rail, passing above 400 times a day? How is it going to affect the students of Makalapa Elementary, Radford High School, Aliamanu Elementary seeing, hearing, feeling 20 times
18:14:58 per hour during peak hours? How do you think it will affect the quality of life of those who live on Salt Lake Boulevard?

The Council has voted 7 to 1 in favor of changing the rail from Salt Lake back to the original route to the airport. You have voted for the rail down the boulevard. Now, feel how it feels to be deceived, disappointed and frustrated that things can get. When the rail route has changed from the airport to Salt Lake Boulevard by Councilmember Cachola, we,
18:15:29 the residents of the boulevard, could not believe this

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was happening. Our frustration and disappointment has been with us for a long time. He has sold our quality of life for a vote and for his vision. A good community leader takes care of his community but will not sacrifice other communities for the betterment of his. A good representative will make sure of this, but in both cases this is not to be. His vision is
18:15:56 the same vision that Salt Lake Boulevard starts and ends at Ala Lilikoi Street. You call this tunnel vision. It starts at Aloha Stadium, passes Halawa Estates Shopping Center, Stadium Mall, Foster Village, Makalapa Elementary, Radford High School and the park, Aliamanu and the Naval Housing and Aliamanu Elementary. All these communities and residents are not seen in his vision or they were and are to be sacrificed.

We have a second chance and we must take
18:16:28 advantages of this. With our eyes wide open we must first remember we live in the best location on this island which is called central. Every location is in driving distance. Yes, we will not give up our cars. And we also have so many different ways to get to our destination and to our home. We will be the last place on this island to give up our cars, because we live in the best location, which is central.

AR00003889

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This does not mean that we give up rail.
18:16:57 Our hope is Councilmember Cachola and our community leaders must have an open mind and take a good look at the airport route. The advantage is ours because of the location we live and the location for the rail station.

(Buzzer sounds.)

Living in a central location would give us the best of three ways to travel, the rail, our buses and most of all our cars. I hope that you not only heard what I have to say but that you listened to the words I have to say, because the families, friends along the boulevard --

18:17:29 HEARING OFFICER HAMAYASU: Please summarize.

MR. TORRES: -- will not lose the second chance we have to move the rail back to the airport.

(Applause.)

HEARING OFFICER HAMAYASU: Thank you.

T. K. Chun followed by Thomas Strout.

MR. CHUN: My name is T. K. Chun. I'm a retired engineer. I live in Pacific Heights area. I missed the hearing last night because of the Christmas party. I support the rail transit system and I vote for it. Good engineering should start with the critical area. We shouldn't start from way up in the Kapolei area. We should start from Waipahu to the downtown area. That's the critical area. And we should do it now. It's probably going to take us more than ten years.

I'll tell you a little story. I was the -- I went to the first public hearing in 1963 for H3. It took us 30 years to build it. So I hope we can build this maybe in ten years or less, because in other countries they build it in four or five years, so I hope I can ride it before I die, before I kick the bucket. I'm 74 years old and I helped build H3, so it took us -- it took us 30 years to do H3. I hope we don't take another 30 years to get our mass transit system.

Thank you.

(Applause.)

HEARING OFFICER HAMAYASU: The next speaker is Thomas Strout followed by Tony Soon and Doug Pyle.

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MR. STROUT: Hello, my name is Tom Strout. I'm a resident of the Salt Lake area. I'm just curious as to why they think the airport would be more advantageous and more efficient to draw in money as opposed to the Salt Lake alignment. The reason being, the employment distribution in the airport, Hickham, Pearl Harbor area, according to your DEIS ranks sixth and the Salt Lake employment ranks seventh
18:19:59 so there's not much of a difference there, but the population difference between the airport versus Salt Lake, airport ranks 23rd; Salt Lake ranks sixth. And by the year 2030 airport is going to rank 24th and Salt Lake is going to rank 9th.

Now, of these rankings, the bigger
18:20:25 population is this side of the stadium, you know. When you look at the drafts you have in your DEIS, it just did not make much sense when there's such little effect out that way. Now, come closer to 2030, yeah, you'll have a greater amount of people out that way, but how many of them travel all the way into town? Some of them only come halfway. The traffic problem is the downtown corridor. If we relieve the traffic
18:20:57 there, it makes it simplified and easier for everybody coming from the other side of the island, you know. That's what I think we should try and look at how we

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really want to spend the money.

Besides the airport route is going to be more costly. It's going to take longer for that route to go from one destination to another. And it just doesn't -- you know, they're going to put a longer delay on getting this thing built and we need to get the thing started.

Thank you.

HEARING OFFICER HAMAYASU: Next speaker

18:21:28 is Tony Soon, followed by Doug Pyle and Maurice Morita.

MR. SOON: Hi. My name is Tony Soon and I live in the Salt Lake area. I voted for the rail, because it was going through Salt Lake. I feel it's fraudulent what the city council are trying to do at this time. Trying to rob us of something equivalentto a birthright that we should be having for all our children and grandchildren. .

I have two sets of comments that I would like to make tonight and one is on the DEIS, and I didn't really read the DEIS in great detail, but here are a synopsis of some of the things which I found which was wrong.

18:21:59

First of all, the DEIS refers to the Salt Lake route as an alternate. When, in fact, it was the only route that was considered for the vote. I think that was wrong. The other thing is that the DEIS makes a skewed assumption that there has been no population growth in the year 2030 for the Salt Lake area, whereas they took the other areas into consideration.

18:22:29

The other thing that the DEIS contemplated was who was the rail supposed to serve, and according to them, according to their DEIS report, it says it is for people with limited income and an aging population. That's the people of Salt Lake. I

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think by bypassing the people of Salt Lake, they would
18:22:59 be robbing these older people and younger people,
younger residents, of this opportunity of being able
to enjoy the benefits of being on the rail.
Then the DEIS also makes reference to the
transportation equity and what that means is it's a
fair distribution of resources so that no other group,
no group, carries an unfair burden or receives an
18:23:27 unfair share of the benefits. When they route the
rail down by the airport, what they're doing is that
they're robbing the people of Salt Lake of this
opportunity.
And here are my personal comments on
this. I would say the people of Salt Lake are aging,
and they have many children, a lot of younger
residents and they're really low income and they need
to be on the rail. The other thing again is there is
this fallacy that is being passed around that the rail
must go to the airport. Well, I lived in the City of
18:23:57 Toronto, which is nearly 4 million people. The subway
does not go to the airport. The subway stops five
miles away from the airport and there's a bus that
takes the tourists to the airport. The other thing
that you need to remember is that can you imagine a
tourist spending thousands of dollars coming to Hawaii

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and leaving $20 tips and $100 tips and then all of a sudden cannot find $30 so they can take a taxi. It's utterly ridiculous.

18:24:28 The other thing I'm worried about is that Salt Lake --

(Buzzer sounds.)

MR. STROUT: -- this report was made by three people, which includes the military, and I think somehow because the military is south of Nimitz, I can't help but be very suspicious about this report.

Thank you.

HEARING OFFICER HAMAYASU: Next speaker is Doug Pyle followed by Maurice Morita.

MR. PYLE: Hello. I don't know if there's a particular format for introducing ourselves. Doug Pyle. I live in downtown. I have family here in
18:24:58 Salt Lake and I also have -- as chair of the democratic party's labor caucus. The democratic party of Hawaii's labor caucus which supports rail, the democratic party supports rail in general, as passed by a resolution at the convention last spring.

The labor caucus has had a lot of talk about it in terms of jobs and its value along those lines and so I strongly support getting rail underway,
18:25:30 both for the jobs it would recreate in construction as well as the economic stimulus it would provide, and given the economy in Hawaii and nationwide that's even more important to get this going soon.

Ideally both routes would be -- are great and should be built. The question is which first, and it does -- there's -- I wouldn't say that our caucus has a consensus, but there is agreement that there
18:25:59 should be as early as possible start. The community did vote on the package, so there's an advantage to starting with Salt Lake, and some suggestions -- I don't know how much flexibility there is still in design, but perhaps if the Salt Lake route were built first, there could be a less expensive, say, light

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rail or tram off to the airport, such as other cities have. I've taken the one in San Francisco, as an example.

18:26:28 And another consideration is that along the route are several important destinations. We also need boarding points in dense population areas, where workers, shoppers can board to get to the destination. Salt Lake has a very dense population and so it deserves its own station. And one consideration is connecting through Camp Catlin Road. That would be --

18:26:58 that's right next to government housing, so it may be -- there may be property that could be used for developing, for example, a spur off to the airport and Pearl Harbor.

I don't want to take up any more time than is allotted and I just wanted to be brief and say that the Democratic Party in general and certainly the labor caucus that I chair supports the construction of rail.

Thank you.

HEARING OFFICER HAMAYASU: Next speaker

18:27:30 Maurice Morita.

MR. MORITA: Hi. My name is Maurice Morita and I live in South Salt Lake, and I hold different hats. I also am the vice chair for the neighborhood board 18 for Salt Lake, Aliamanu and Foster Village and I also work for the Hawaii State Teachers Association who supports the rail, too. Not the route, but the rail.

I do feel for the people that live on
18:27:59 Salt Lake. We have some staff and some friends that do live on Salt Lake, and they always tell me because they know that I support the rail that I'm sorry, but I oppose the rail, and the reason why they oppose the rail is because they don't want it through their backyard. And that's the problem that we have is prisons, rubbish dumps; nobody wants it in their backyard so the City Council sometimes doesn't know where to build or put those things. And it's hard.
18:28:27 So we send the prisoners to Texas. Unfortunately, we can't send people away.

But I think the rail is for the future and I -- and, like I said, I do understand the people that live on Salt Lake Boulevard, you know, for years and the way they feel, but to me I think we need the rail to come through Salt Lake for various reasons that these folks have said.

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As far as the schools go, they do take a sound test to see if there's too much noise, and if there is too much noise, then the Department of
18:28:59 Education usually will put air conditioners in the classroom. So that would be a plus for the schools to have air in the classroom, like all the other state offices and county offices are all air conditioned. Even the prison have air conditioners, but the schools don't have -- you know, some do, but not all. That would be a plus for the schools there that is on the site.

And then the other reasons that were given about why the rail should come through Salt Lake
18:29:27 is we do have an aging group here and there's a lot of people that work in downtown, so I think that it would be advantageous for us. In talking to you, Toru, it could cost less to do a spur from Salt Lake to the airport than versus from the airport to South Salt Lake. So I think we would save a lot of money if we go to Salt Lake first and then do a spur to the airport when it decides to go to Waikiki, because they're not going to Waikiki on the first round.

Thank you.

HEARING OFFICER HAMAYASU: Next speaker
18:30:00 is Janice Soon Fah.

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MS. FAH: My name is Janice Soon Fah and I'm a resident of Salt Lake. I'm also a teacher at the Department of Education. I went out to exercise my vote in the full knowledge that my vote would be honored, and I think the Salt Lake vote carried the
18:30:27 rail. And I think we betrayed the trust of voters and we will lead to more apathy in voter turnout if we do not honor this vote that the Salt Lake residents made.

As far as concerns by the residents, I think as the residents who are concerned that this is going to create unsightly trains in their backyards, if they were to look at the route, the route follows Salt Lake Boulevard, and if they're familiar with the
18:30:58 rail systems -- I lived in Toronto for 26 years before moving here to Hawaii, and I've lived here for 12 years, and actually the light rapid transit in Toronto drives along some of the most prestigious neighborhoods and it is so quiet, it is so clean, it is so efficient that people who formerly would drive their cars bumper to bumper into downtown Toronto will
18:31:29 hop on that train and be in downtown in 30 minutes. They can read their newspapers, they can relax and they can actually enjoy the commute.

As a Salt Lake resident, I work in Kapolei, so I have a lot riding on this rail

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development, because I can see where a lot of young teachers who live in central district now will be able to offer their services in Leeward district where we have a demand for highly qualified teachers to teach in our struggling schools in the Leeward district.

18:31:58 Okay. I also understood from the information that was provided that no homeowner property will have to be acquired, at least not their entire home, which is what some people may fear; that it will infringe on their property and their property will be acquired, but because it's going to be an aboveground rail, what will happen is most of the run -- most of the operations will be above ground and they will just need land space to locate the elevators

18:32:28 that will take the commuters to the ground level. So I think if we familiarize ourselves with the rail and what it's going to offer our community, we, the Salt Lake residents, will fight those politicians who at first opposed the rail and now that the vote has been carried for the rail are striving to influence that decision to move it to the airport. I say we go for Salt Lake and the airport or we go with the voters who voted for Salt Lake.

Thank you.

HEARING OFFICER HAMAYASU: Thank you.

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18:33:00 That concludes the preregistered speakers. Now, is anyone else present who would like to provide a comment on the project issues? If you have not signed to register, please state your full name and address.

MR. PEPPER: My name is Len Pepper. I live at 1352 Olino Street which is in Foster Village.
18:33:29 I am in favor of the Salt Lake route. I think that the EIS is a good document and now I'm going to proceed to crab about it.

There are some things missing, which I think have import as far as deciding which alignment to use. In 1 -- I think it's in 1-6, there is a list of activity centers. That list does not include the
18:33:58 Moanalua Shopping Center. It does not include the Stadium Marketplace. It did not include the Bouganville industrial area where we have got, for example, both wholesale and retail outlets and we have got a Target coming, I think, in March. It does not include the commissary area. It does not include the military public works center.

18:34:29 It's a fairly static document. It does not -- it gives a lot of statistical information about what it's going to be like in 2030, but it doesn't look at what the community is really going to look like and what the people are going to be like in 2030. In my judgment it is an aging community, Foster Village, for example, was begun in 1957 and so by 2030
18:34:56 it's going to be about 80 years old. The Salt Lake area will -- is also -- is about 30 years old at this

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point. The infrastructure will be aging, the population will be aging. It is likely to be poorer than it is now. Therefore, there is need for considerable assistance from public transportation.

18:35:22 There are five schools, along the route. Makalapa School, Radford High School, Aliamanu Elementary, Aliamanu Intermediate and Moanalua High School. Again, in my vision of 2030, there will be magnet schools and other attractions which will bring people to those schools from other areas. Those kids will need public transportation.

In addition, the document seems to talk

18:35:59 mostly about a five-day-a-week bring people to work and bring them back from work, but there's a lot of social benefit to be derived seven days a week from a public transportation system, and I hope that those things will be taken into account.

If there are other things, I'll give them to the public steno. Thank you.

HEARING OFFICER HAMAYASU: Is there anyone else that wishes to testify?

18:36:26 Please state your full name and address for the record.

MR. TAYLOR: Hello. My name is Mark Taylor and I'm a resident of 3427 Ala Hinalo Street in Salt Lake.

I'm just here to speak in favor of the Salt Lake alignment. I've already provided written testimony so I'm not going to repeat what's in that in this oral statement. I'm just going to highlight one item, which is in the Draft EIS which has to do with the cost of the airport alternative versus the Salt
18:36:57 Lake alternative. The draft says in Section 6.4.2 that both the Salt Lake and airport alternatives would be financially feasible and yet that same paragraph says that the airport alternative would require $1.4 billion in federal funding from the Federal Transit Administration. The document also says, though, that the FTA has not been approached to consider the 1.4 billion for the airport alternative. They've only
18:37:25 agreed to consider 1.2 billion. I don't really quite understand how the EIS can state categorically that the airport alternative is financially feasible if the FTA has not been approached for funding that's required to construct it.

I think the reality is that this project is hovering on the very cliff of affordability, and if we go to the airport route and a couple of hundred

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million dollars in additional costs we're putting all
18:37:59 the taxpayers in this room at risk of potentially having their property taxes raised to cover the shortfall, because if the FTA doesn't pay for it and the excise tax doesn't pay for it, all of you will be paying for it with higher property taxes.

I would also point out that Draft EIS does say that the Salt Lake route is the most cost effective route. It provides in the terms of the amount of dollars we're spending in benefit per dollar
18:38:25 a higher efficiency return than the airport route does. So simply from the standpoint of fiscal prudence, the Salt Lake route should continue as the preferred route for the transit system.

Thank you.

MR. REMMELL (phonetic): My name is Ben Remmell. I'm a professional engineer and master planner. And I'd like to comment on two things, which is the project phasing, which is Chapter 2 of the Draft Environmental Impact Statement, and it says that the first phase would be from Kapolei to Waipahu, and
18:38:59 I totally disagree with that, because it would -- if we run out of money, the general excise tax is not providing the money that we need. We need to build it to eliminate the bottlenecks at Middle Street and Pearl City, so the first phases should be from Aloha Stadium to downtown and that's what I recommend for
18:39:28 the DAS to consider in the project phasing.

The second point I want to make is that the single and most important reason for building mass transit is to eliminate traffic congestion. Rail simply does not do that, despite spending $7 billion. The City's alternative analysis show that the current 2,000 vehicles per hour at Pearl City, which is now
18:40:01 congested, will increase to 8,000 vehicles per hour after the $7 billion rail is built. What we need is an alternative solution which the alternative analysis discarded fraudulently. And I suggest we need to
18:40:23 build a Nimitz flyover and a Kam flyover, both of which would be three lanes over the Kam highway and

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Nimitz which will eliminate the bottlenecks at the Pearl City H1/H2/Middle Street merge for less than $1 billion and that's what the DEIS must and should include.

That's what I recommend.

(Applause)

HEARING OFFICER HAMAYASU: Anyone else wishing to testify?

18:40:56

MR. UECHI: My name is Mike Uechi. I'm a physician. It's really interested to read the -- this pamphlet put out by the City at taxpayers' money, The Honolulu Rail Transit, and one of the questions they ask is how would property owners along the route be
18:41:28 affected, and it states here that while some residential and commercial properties must be acquired in full, most of the right-of-way acquisitions required are for portions of individual parcels. Now, does that mean that if part of the rail post, the support, goes through part of a property like say through the living room, that you pay for that portion of the land and let the person live in the rest of the
18:41:57 land? That's the part that I really don't understand. What does portions mean? Does it mean a little bit of thing that's not attached to the home or business, and that's the only portion you're going to pay for.

The other question I have is that while construction of rail goes on and let's say there's a delay and another delay and another delay while properties that are being sold or leased are abandoned
18:42:25 by property owners, what's going to happen to the cost of construction? What's going to happen to the community that's involved when this rail gets stalled for any reason at all, whether there's problems with

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finding burial sites along the City properties or whether you run out of money or any type of thing that will stall the development while it's going on right now? And that's the type of questions I would like to ask you guys right now, because I think these are the questions the community needs to know before we actually start the rail.

18:42:59 That's all I have to say.

HEARING OFFICER HAMAYASU: Any other person wishing to speak?

MR. GENADIO: My name is Frank Genadio. You have my address. I'm from Kapolei. I thought that you could only testify once, but when Dr. Uechi came up, I realized I could testify again. I've been following the hearings. In Kapolei I tried to make
18:43:28 the point that the Draft EIS brushed off other technologies. I happen to be a proponent of something called the HSST urban magnetic levitation system. Those of you who are concerned about the cost should be aware that the maglift guideway would be built at least 20 percent cheaper. The guideway construction would accommodate 25.3 miles for the 20 mile cost
18:43:59 reflected in the Draft EIS. In other words, we could have an extension into Salt Lake from the airport route, we could also have an extension to UH Manoa whose students have been left out of this entirely, and we could even have a spur into Waikiki.

It also happens to be at least twice as quiet as steel wheels on steel rail and its guideway is much less obtrusive and will require much less
18:44:28 impact on property. Thank you.

(Applause.)

HEARING OFFICER HAMAYASU: Another speaker.

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MS. ING: Yes. My name is Renee Ing. My address is P.O. Box 23094, Honolulu 96823. I'd like to talk about another technology that was not included in the EIS despite words to the effect that everything was studied, and I think it should be studied.

18:44:58 Phileas magnetic guided -- magnet guided, not magnet levitation. A similar system was funded in San Francisco and someplace in Oregon by the FTA in 2007 and that means it could be funded for here. It is 1.5 billion compared to 5 and 6 billion. It's 1.5 billion

18:45:29 for the Kapolei to UH route. It can be built with just plain old -- our plain old GET money. You don't even need New Starts money. But on top of that it can be quiet running through Salt Lake. Not only can you go cut and cover, you cut a mini tunnel underneath the boulevard, cover it so that Salt Lake Boulevard

18:45:57 continues to run, but you cut and cover a tunnel underneath.

On top of that if you had to, you could -- because it's a Prius-like vehicle, it's very, very quiet and it will be of hydrogen fuel cells in a few years and on top of that it does this thing called running silent. It can be -- the noise can be cut for a little bit while it's going through the residential areas. That's the noise problem.

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The second problem that we have been hearing a lot about it that if the route that's
18:46:30 constructed now, actually if it were for steel rail, I think it's a pretty good route, but the problem is there are other technologies. Phileas can go around a lot of these places that are going to be intersected by a steel train, Phileas will not cut through them, it will simply go around them, because it is very, very flexible. So I would really hope that the City administration will study the Phileas system and the
18:46:59 urban maglift that Mr. Genadio was talking about in the EIS. The FTA usually says it expects municipalities to study a broad range of modes of technology, not just one. So it's not something that Honolulu will be -- you know, it would be unusual for Honolulu to do this. Other municipalities studied a lot of different ways of technology before they choose, and to give them the chance to submit a
18:47:30 request for proposal.

Thank you.

HEARING OFFICER HAMAYASU: Anyone else who wishes to testify? If nobody else is interested in providing their comments, I conclude the hearing at 6:48 p.m. Thank you for your time and interest in the project.

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18:47:52 MR. TAKAI: I signed up.

HEARING OFFICER HAMAYASU: I'm reopening the hearing.

MR. TAKAI: My name is Mark Takai. I'm a state representative, representing the communities of Aiea and Pearl City. Tonight I speak as the chairman of the Kamehameha Highway improvements task force and for those of you who are unfamiliar with our task force, it's comprised of all the elected officials in
18:48:29 the Aiea, Pearl City and Salt Lake areas. It also consists of the Aiea, Pearl City and Salt Lake, Foster Village neighborhood boards. In addition to that, it includes some of the significant stakeholders along the Kamehameha Highway corridor in Aiea/Pearl City.

The corridor for us begins on Center Drive on the east side and goes all the way for about
18:48:57 5.5 miles to the end of Kamehameha Highway on the Pearl City side, which is a little bit past Sam's Club.

We've been working at improvements along this corridor for about three years, and we try to meet quarterly. Two years ago when this issue came up, we took a position as a task force, and I just wanted to mention -- and we sent it in a few times and I've testified in front of the Council a number of times, but I wanted to put this in the record. A
18:49:28 couple of things that the City as you move down this path should be considering.

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The first one is about 20 years ago there was a compromise made by the City and Hawaiian Electric to underground the 48 kilavolt lines on the mauka side of the viaduct, but to construct the 138KV lines that are the huge super structures, the huge metal poles that run the entire length of the corridor, and I do believe it goes up Salt Lake Boulevard as well. Our task force recommends that the City consider incorporating the 138KV and all of the other utilities down that corridor into the mass transit super structure. It's a small price for our community to -- I mean, it's a big price for our community to have the train coming through our corridor and I think it's a small price for the users and for the City to incorporate those utility lines within the super structure.

18:49:57

18:50:28

The second one is we spent a lot of money and a lot of time planning for aesthetic improvements up and down the corridor. In fact, we hired -- the State hired Parsons Brinckerhoff and in that consulting contract we have set aside some funds to hire an architectural engineer --

18:50:59

(Buzzer sounds.)

-- who has spent a lot of time designing motifs and everything. So we would like to request as

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you move forward that you consider working with us, especially in our corridor, but also working with other communities as you design the way these super structures look and the way the medians look throughout our communities.

I'll be sending written comments in later. Thank you.

HEARING OFFICER HAMAYASU: There's no other speaker. Wait. Wait. Are there any other speakers before I open 30 second round?

18:51:28

MR. LOO: My name is Herbert Loo. I'm a retired master sergeant, retired in 1966. When I was drafted in 1945, I took my first train ride from
18:51:52 Iwilei up to Schofield. Too bad they don't still have that train line. I'm here to support the rail transit, because in my travels in New York City, seven years there, you see billions of people traveling on the subway, terrific transportation. Just think if they didn't have that type of transportation, just think if we had that transportation 20 years ago. We are so backwards here it's pitiful. Build it right
18:52:29 away, as soon as possible. Thank you.

(Applause.)

HEARING OFFICER HAMAYASU: Anyone else wishing to testify? I thought there was somebody there. No. Yeah.

SCOTT: My name is Scott. I live here in the Salt Lake area. I'm born and raised here in Hawaii. I've seen a lot of stuff growing up here as a kid. I've seen how when I was a little kid I could go to Queen's with my dad, when he used to work there, in ten minutes. Nowadays if you're not on the road before 6:00 in the morning to get past Middle Street, you'll be lucky to take an hour and a half. That's five, seven miles, and it's not getting any better. It's only getting worse. There's no perfect solution with mass transit, but if we don't do something with this rail and get something going, regardless of what medium we use, whether it be steel on steel, magnetic or otherwise, ten years from now to try and figure out something, then it's going to be too late.

The other thing, too, we have got to look in the smart sense. You know, picking these routes and stuff is great, but we have got to link one end of the island to the other, because if there's a bad wreck or something like that, traffic and everything around here comes to a halt. Also, through the airport. We have got to get some efficiency into how we get around here. The smart thing would be is whatever route we pick, think of the long term as far as linking the new university in Kapolei out there to

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the universities and work down in town and also allowing for the business people and other people who travel light to go through the airport, because the ability to build a super structure there is easy. Look at the parking structures they've got going up. It's not an eyesore and it makes it more centralized, especially being all of this is part of the Department of Transportation.

18:54:30

So, we have got to do something now. Not talk about it, think about it, maybe build it in 20 years, like the H3. Obviously the H3 works. In other places around the world they use rail on rail, DART, BART. It all works. But we need to implement it now before it's almost too late.

Thank you.

HEARING OFFICER HAMAYASU: Anyone who hasn't spoken wish to speak? Okay. I'm going to give this gentleman another chance.

18:54:57

MR. PYLE: Thank you. Doug Pyle. I spoke earlier on behalf of an organization I chaired and I want an opportunity to add a few personal items of testimony. Two points, one would be the -- everybody who lives or has family like I do in Salt Lake knows how the congestion really jams up right at the convergence where Hl and Red Hill and the on-ramp
18:55:28 here below Tripler all come together, and rail would be a great alternative for this community in particular to be able to have -- to get out of that mess and get to their destinations, and I think that's an advantage that the airport route does not have. Although in the long run I think the airport route would be real valuable to also have, perhaps as a spur.

And secondly, and I think it's very
18:55:58 important, I haven't seen the City doing this yet -- I hope it will -- look at rail as being one part of an integrated transit plan, including pedestrian/bicycle and just -- I grew up in Portland, Oregon which won awards for planning comprehensively. It has rail, but it has a bus mall that is pedestrian/bus only, no cars. Fareless Square, which is extremely successful.
18:56:26 People can park their cars, park and ride, and if they're downtown, they ride any of the modes of

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transportation for free, and then go home. The traffic flows wonderfully there because they planned in a comprehensive way, and I hope the City will do that, too.

One final point when I just noticed that no other hands were going up, I remembered hearing at one of the hearings was reportedly had low turnout, and even though perhaps there's only a few people that testified, I think the record should show that this room is over full and there's standing room and in the parking lot it was real hard for me to find a spot. There's a lot of interest here in Salt Lake certainly, I assume in support, but certainly a great deal of interest in this, so I didn't want that to go unnoted, the turnout.

18:57:00

Thank you.

HEARING OFFICER HAMAYASU: Okay. Again, I'd like to open up for a person who didn't testify already. If not, okay. Go ahead.

18:57:27 MR. SOON: Tony Soon here again. It is said that the airport route is going to cost $200 million more. The reality is I can assure you it's probably going to be more like half a billion. Where is that money going to come from? I do not know. You know right now the City is under duress in trying to meet the EPA standards for a secondary waste water
18:57:59 treatment plant. That's going to be $1.5 billion. That 200 -- supposedly $200 million can go toward a down payment on getting this fixed.

We also have the existing (inaudible) carriers down there that all need to be repaired. That's another $300 million that's going to take basically. And then they talk about a $5 million annual operational cost in perpetuity, meaning for my
18:58:25 lifetime and my grandkids lifetime and that $5 million could go toward building a homeless shelter, maybe two homeless shelters every year, or it could go toward fixing schools or it could go toward fixing over 20,000 potholes a year. Every year we can just fix these potholes, 20,000 of them.

So I think by putting the routes south of the Nimitz down by the airport way, which is a blighted area of town, I think it's stupidity, and
18:58:59 because most of the people who live south of Nimitz

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are military and most of them drive and, of course, they get gas for half price or, okay, two-thirds of what we pay for it and you do need your car with a sticker on it to be able to enter into the military compounds. So trust me, they're still going to be driving. Now what happens after 5:00 on this route? It's going to totally deserted. And my opinion to the City is that maybe what we need is a wiki-wiki system
18:59:29 that will serve that area and maybe at 6:00 we just cut it off. Why are we going to have a route running down to the airport with nobody sitting on it except people going back to Kapolei? Is it not for everybody in Honolulu? Why just only people in Kapolei.

Thank you.

HEARING OFFICER HAMAYASU: Anyone else? Okay. If nobody else is interested in speaking or providing their comments, I'm concluding this hearing
18:59:59 again at 7:00.

Thank you for coming.

(Hearing concluded at 7:00 p.m.)

STATE OF HAWAII)
COUNTY OF HONOLULU)

I, Nancy P. Blankenship, Certified Shorthand Reporter, in and for the State of Hawaii, certify that the foregoing proceedings were reported stenographically by me at the time and place indicated.

Given under my hand on this the 29th day of December, 2008.

Nancy P. Blankenship, CSR #459

AR00003963

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-332731

Mr. Michael Burton
2889 Ala Ilima Street, #16A
Honolulu, Hawaii 96818

Dear Mr. Burton:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

Your preference for the Salt Lake Alternative has been noted. To address your first point, while each of the alternatives discussed in the Draft EIS includes trade-offs between benefits and impacts, the Airport Alternative from East Kapolei to Ala Moana has been selected as the Preferred Alternative as described above. As compared to the alternatives discussed in the Draft EIS, the Airport Alternative will carry the most passengers, provide the greatest transit-user benefits, and result in the fewest vehicle hours of delay. It will provide access to employment centers at Pearl Harbor Naval Base and Honolulu International Airport and will serve the Salt Lake neighborhood with connecting bus service. Of the three Build Alternatives addressed in the Draft EIS, the Airport Alternative will have slightly less impacts to the natural and built environment analyzed in the Draft EIS. During the public comment period on the Draft EIS, the public overwhelmingly supported the Airport Alternative. Of the comments that specifically supported one of the alternatives, more than 75 percent were in support of the

Airport Alternative. For more information this selection is discussed in Section 2.4 of the Final EIS. Since publication of the Draft EIS, design has been advanced, further analysis has been completed, and information has been added in response to comments on the Draft EIS and agency coordination. The Final EIS discusses the process that was used to select the Preferred Alternative, how comments were considered in the decision-making process, impacts and mitigation commitments.

Regarding your second point, communication and coordination with the military and other parties have been ongoing and will continue as the Project progresses.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

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MUFI HANNEMANN
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SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010 RT9/09-337212

Mr. Robert Webb
5320 Likini Street, #6
Honolulu, Hawaii 96818

Dear Mr. Webb:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal.

Your opposition to the Salt Lake Alternative is noted. While each of the alternatives discussed in the Draft EIS includes trade-offs between benefits and impacts, the Airport Alternative from East Kapolei to Ala Moana has been selected as the Preferred Alternative as described above. Compared to the alternatives discussed in the Draft EIS, the Airport Alternative will carry more passengers, provide the greatest transit-user benefits, and result in the fewest vehicle hours of delay. It will provide access to employment centers at Pearl Harbor Naval Base and Honolulu International Airport and will serve the Salt Lake neighborhood with connecting bus service. Of the three Build Alternatives addressed in the Draft EIS, the Airport Alternative will have slightly less impacts to the natural and built environment analyzed in the Draft EIS. During the public comment period on the Draft EIS, the public overwhelmingly supported the Airport Alternative. Of the comments that specifically supported one of the alternatives, more than 75 percent were in support of the Airport Alternative. For more

information this selection is discussed in Section 2.4 of the Final EIS. Since publication of the Draft EIS, design has been advanced, further analysis has been completed, and information has been added in response to comments on the Draft EIS and agency coordination. The Final EIS discusses the process that was used to select the Preferred Alternative, how comments were considered in the decision-making process, impacts and mitigation commitments.

Regarding schools, Radford High, Aliamanu Elementary, and the Salt Lake Public Library are located along the Salt Lake alignment and, therefore, will not be affected by the Project.

Your concerns about traction power substations have also been noted. However, the traction power substations will be secured within a locked building and will not be accessible to the public.

For your next points, as presented in Chapter 3 of the Final EIS, the Project will result in reduced vehicle miles traveled and higher shares of total travel when compared to No Build conditions. As stated in Section 3.4.2, approximately 40,000 automobiles will be removed from roadways as a result of the Project, compared to No Build conditions. In addition, park-and-ride lots will be built at East Kapolei, UH West Oahu, Pearl Highlands, and Aloha Stadium. These lots will allow riders to access the fixed guideway system via car.

As stated in Section 4.10.3 of the Final EIS, the Project will cause no severe noise impacts. Moderate impacts will occur at upper floors of a few high-rise buildings (as shown in Table 4-18 in the Final EIS). With the recommended mitigation in place (sound absorbing material and wheel skirts), the noise analysis indicates that the new noise generated by the Project will be lower than the existing noise levels in most places.

The project design includes an integrated noise-blocking parapet wall at the edge of the guideway structure that extends 3 feet above the top of the rail. The parapet wall will substantially reduce ground-level noise.

Wheel skirts will increase the benefit from the parapet wall at locations above the elevation of the track. The use of sound-absorptive materials below the tracks in the areas that will experience moderate noise impacts will reduce the Project noise levels from the upper floors to below the impact level. Once the Project is operating, noise levels will be re-measured to confirm that there are no noise impacts from the Project.

Lastly, Section 4.4.3 of the Final EIS specifies the following mitigation for impacted business and residential owners. Where relocations will occur, compensation will be provided to affected property owners, businesses, or residents in compliance with all applicable Federal and State laws and will follow the Federal Uniform Relocation Assistance and Real Property Acquisition Policies Act. The plan includes the following measures related to relocations:

- *The City will assist all affected persons in locating suitable replacement housing and business sites within an individual's or business's financial means.*

- *The City will provide relocation advisory services to businesses where acquisition of adjacent property may substantially reduce clientele, limit accessibility, or affect a business in other substantial ways.*

- *A minimum 90-day written notice will be provided before any business or resident will be required to move.*

- *Relocation services will be provided to all affected business and residential property owners and tenants without discrimination; and persons, businesses, or organizations that are displaced as a result of the Project will be treated fairly and equitably.*

- *Where landscaping, sidewalks, and driveway access will be affected by the Project, coordination will occur with the landowner, and these property features will be replaced and/or the property owner will be compensated in accordance with the Real Estate Acquisition Management Plan (RTD 2008q).*

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

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WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-332736

Mr. Tony Soon
1318 Wanaka Street
Honolulu, Hawaii 96818

Dear Mr. Soon:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

Your comments have been noted. The EIS is required to look at the range of reasonable alternatives that meet the Project's Purpose and Need. The Draft EIS analyzed three alternatives: Salt Lake, Airport, and a combination of both. The City has since identified the Airport Alternative as the Preferred Alternative. While each of the alternatives discussed in the Draft EIS includes trade-offs between benefits and impacts, the Airport Alternative from East Kapolei to Ala Moana has been selected as the Preferred Alternative as described above. As compared to the alternatives discussed in the Draft EIS, the Airport Alternative will carry the most passengers, provide the greatest transit-user benefits, and result in the fewest vehicle hours of delay. It will provide access to employment centers at Pearl Harbor Naval Base and Honolulu International Airport and will serve the Salt Lake neighborhood with connecting bus service. Of the three Build Alternatives addressed in the Draft EIS, the Airport Alternative will have slightly less impacts to the natural and built environment analyzed in the Draft EIS. During the public comment period on the Draft EIS, the public overwhelmingly supported the Airport Alternative. Of the comments that specifically supported one of the alternatives, more than 75 percent were in support of the Airport Alternative. For more information this selection is discussed in Section 2.4 of the Final EIS. Since publication of the Draft EIS, design has been advanced, further analysis has been completed, and information has been added in response to comments on the Draft EIS and agency coordination. The Final EIS discusses the process that was used to select the Preferred Alternative, how comments were considered in the decision-making process, impacts and mitigation commitments.

Per your comments regarding population, the projections were provided by the OahuMPO. The Salt Lake neighborhood is fully developed, and average household size is decreasing over time. Population in that area is not anticipated to increase between now and 2030.

For your next point as to who the Project is intended to serve, the Project is intended to serve the entire population of Oahu, including the communities of concern discussed in the Draft and Final EISs. Figure 4-15 in the Draft EIS indicates that Salt Lake, as well as Waipahu, Kalihi, and the Pearl Harbor and Airport areas, contain concentrations of these populations. The Salt Lake alignment includes many residents who would benefit from the rail system. The same is true for the Airport alignment. The difference is that along Salt Lake, the majority of users are residents of the area. Along the Airport alignment, most users are employees who come from all over the island. Residents in Salt Lake will be served by local feeder bus service that will integrate with the fixed guideway system. Tourism is only a minor percentage of the ridership expected for the Airport alignment. It can be argued that both have merit. As indicated in Chapter 3 of the Draft EIS, the Airport alignment has more riders. Chapter 6 of the Draft EIS shows Salt Lake is slightly less expensive, but with a few more environmental impacts. The cost-effectiveness ratio in Chapter 7 of the Draft EIS shows the two alternatives are nearly identical in terms of overall performance.

Regarding equity, Section 4.7 of the Draft EIS reviews Environmental Justice regulatory context and methodology. This includes the basis for determining environmental justice areas within the project corridor. Federal law requires that no low income or minority population be disproportionately adversely impacted by a project. Communities with concentrations of populations that are protected by environmental justice requirements, as defined by the Federal Government, exist along both the Salt Lake and Airport alignments and are comparable in size and number.

Lastly, the military was not involved in the selection of the Airport Alternative.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

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MUFI HANNEMANN
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WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-333690

Mr. Tony Soon
1318 Wanaka Street
Honolulu, Hawaii 96818

Dear Mr. Soon:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

Chapter 6 of the Final EIS can provide information on the cost and financial analysis for the Project. Also, a comparison of the estimated costs of the Salt Lake Alternative and the Airport Alternative is presented in Table 6-1 of the Draft EIS. The proposed capital funding sources for the Project cannot be used for non-public transportation projects like a secondary wastewater treatment plant. Enabling legislation for the County General Excise and Use Tax surcharge and Ordinance 07-001 preclude the use of the collected funds for purposes other than a fixed-guideway transit system.

In addition, Section 6.4 of the Final EIS describes the funding sources to pay for ongoing operations and maintenance costs associated with maintaining the resulting transit system in a state of good repair. Operations and maintenance costs will be paid for from the same sources

currently used for TheBus: Federal funding, fare revenues, and subsidies from the City's General and Highway Funds. Funding for guideway maintenance will be covered in the City's annual budgeting process and amounts to between 2 and 3 percent of the City's annual operating budget. As shown in Table 6-3 of the Final EIS, approximately 65 percent of the 2030 transit operating and maintenance costs will be for TheBus.

Your preference for the Salt Lake Alternative has been noted. While each of the alternatives discussed in the Draft EIS includes trade-offs between benefits and impacts, the Airport Alternative from East Kapolei to Ala Moana has been selected as the Preferred Alternative as described above. As compared to the alternatives discussed in the Draft EIS, the Airport Alternative will carry the most passengers, provide the greatest transit-user benefits, and result in the fewest vehicle hours of delay. It will provide access to employment centers at Pearl Harbor Naval Base and Honolulu International Airport and will serve the Salt Lake neighborhood with connecting bus service. Of the three Build Alternatives addressed in the Draft EIS, the Airport Alternative will have slightly less impacts to the natural and built environment analyzed in the Draft EIS. During the public comment period on the Draft EIS, the public overwhelmingly supported the Airport Alternative. Of the comments that specifically supported one of the alternatives, more than 75 percent were in support of the Airport Alternative. For more information this selection is discussed in Section 2.4 of the Final EIS. Since publication of the Draft EIS, design has been advanced, further analysis has been completed, and information has been added in response to comments on the Draft EIS and agency coordination. The Final EIS discusses the process that was used to select the Preferred Alternative, how comments were considered in the decision-making process, impacts and mitigation commitments. Figure 3-12 in the Draft EIS shows daily boardings and alightings at each station. As shown, the stations along the Airport Alternative will attract higher ridership than those along the Salt Lake Boulevard Alignment.

Pearl Harbor Naval Base and the Airport are major employment destinations. The fixed guideway system will provide an alternative to use of automobiles for those traveling to and from destinations along the Airport Alternative. In addition, ridership projections for the forecast year of 2030 have been developed using the travel demand model used by the Oahu Metropolitan Planning Organization (OahuMPO) for the Oahu Regional Transportation Plan (ORTP), which was calibrated calibrated against collected traffic and transit ridership information and then validated against recent counts to be sure it properly represents travel activity in the transportation system (Section 3.2.1 of the Final EIS). An on-board transit survey was completed in December 2005 and January 2006, and the latest socioeconomic information available as of October 2008 was incorporated. Traffic counts were collected in 2005, 2007, and 2008. The model is based upon a set of realistic input assumptions regarding land use and demographic changes between now and 2030 and expected transportation levels of service on both the highway and public transit system. OahuMPO undergoes model updates every five years to reflect land use and transportation network changes. The model is approved by the OahuMPO Technical Advisory Committee. Based upon the model and these key input assumptions, approximately 116,000 trips per day are expected to use rapid transit system on an average weekday in 2030. Since the Draft EIS was published, the travel demand model has been refined by adding an updated air passenger model (which forecasts travel in the corridor related to passengers arriving or departing at Honolulu International Airport), defining more

realistic drive access modes (driving alone or car pooling) to project stations and recognizing a more robust off-peak non-home-based direct demand element (trips that do not originate at home) based on travel surveys in Honolulu.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

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MUFI HANNEMANN
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WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-333572

Mr. Doug Pyle
55 South Kukui Street
Apartment 606
Honolulu, Hawaii 96813

Dear Mr. Pyle:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

Chapter 6 of the Final EIS provides a financial analysis for the Project. Also, as stated in Section 4.18 of the Final EIS, the Project would generate an average of about 10,000 jobs per year over the nine-year construction period.

Your preference for the Salt Lake Alternative has been noted. While each of the alternatives discussed in the Draft EIS includes trade-offs between benefits and impacts, the Airport Alternative from East Kapolei to Ala Moana has been identified as the Preferred Alternative as described above. Compared to the other alternatives discussed in the Draft EIS, the Airport Alternative will carry the most passengers, provide the greatest transit-user benefits, and result in the fewest vehicle hours of delay. It will provide access to employment centers at Pearl Harbor Naval Base and Honolulu International Airport and will serve the Salt Lake

neighborhood with connecting bus service. Of the three Build Alternatives addressed in the Draft EIS, the Airport Alternative will have slightly lower impacts to the natural and built environment. During the public comment period on the Draft EIS, the public overwhelmingly supported the Airport Alternative. Of the comments that specifically supported one of the alternatives, more than 75 percent were in support of the Airport Alternative.

The Alternatives Analysis phase, which preceded the EIS process, is documented in Chapter 2 of the Final EIS. It evaluated a range of modal and general alignment alternatives, in terms of their costs, benefits, and impacts. The scoping process for the Alternatives Analysis involved a presentation of the viable alternatives to the public and interested public agencies and officials to receive comments on the Purpose and Need, alternatives, and scope of the analysis. Scoping for the EIS followed the FTA process that provides for a culling of alternatives studied in the EIS through an Alternatives Analysis. The scoping process initiated for the Alternatives Analysis included a variety of highway, bus and fixed guideway options for consideration. During the later scoping effort for the EIS, the public was requested to propose alternatives that would satisfy the purpose and need at less cost or with greater effectiveness, less environmental or community impact and to propose alternatives that were not previously studied and eliminated for good cause. The only alternative that emerged that met these criteria was a fixed-guideway alternative following several alternative alignments. All reasonable alternatives that emerged from these processes were ultimately evaluated in the Draft and Final EISs.

Since publication of the Draft EIS, design has been advanced, further analysis has been completed, and information has been added in response to comments on the Draft EIS and agency coordination. The Final EIS discusses the process that was used to select the Preferred Alternative, how comments were considered in the decision-making process, impacts, and mitigation commitments.

In addition, during the alternatives screening process, a Camp Catlin Road alignment was reviewed and eliminated.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-333688

Mr. Doug Pyle
55 South Kukui Street
Apartment 606
Honolulu, Hawaii 96813

Dear Mr. Pyle:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

Your preference for the Salt Lake Alternative has been noted. While each of the alternatives discussed in the Draft EIS includes trade-offs between benefits and impacts, the Airport Alternative from East Kapolei to Ala Moana has been selected as the Preferred Alternative as described above. As compared to the alternatives discussed in the Draft EIS, the Airport Alternative will carry the most passengers, provide the greatest transit-user benefits, and result in the fewest vehicle hours of delay. It will provide access to employment centers at Pearl Harbor Naval Base and Honolulu International Airport and will serve the Salt Lake neighborhood with connecting bus service. Of the three Build Alternatives addressed in the Draft EIS, the Airport Alternative will have slightly less impacts to the natural and built environment analyzed in the Draft EIS. During the public comment period on the Draft EIS, the public overwhelmingly supported the Airport Alternative. Of the comments that specifically supported one of the

alternatives, more than 75 percent were in support of the Airport Alternative. For more information this selection is discussed in Section 2.4 of the Final EIS. Since publication of the Draft EIS, design has been advanced, further analysis has been completed, and information has been added in response to comments on the Draft EIS and agency coordination. The Final EIS discusses the process that was used to select the Preferred Alternative, how comments were considered in the decision-making process, impacts and mitigation commitments.

The Project is designed to be one part of a multi-modal transportation system. Access to stations will be in the form of bus, walking, bicycling, and drop-off and, in some cases, park-and-ride. As indicated in Chapter 2 of the Final EIS (Section 2.5.6), the bus system will be modified to complement the rail transit system, with additional feeder buses connecting surrounding communities to the stations. The Project is coordinating with City and State agencies to encourage development of enhanced pedestrian and bicycle facilities near the stations, although the actual construction of such facilities is beyond the scope of this Project.

Lastly, substantial attendance of the Salt Lake neighborhood at the Public Hearing held in the Salt Lake area is noted.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-333573

Mr. Maurice Morita
1142 Ala Aloalo Street
Honolulu, Hawaii 96818

Dear Mr. Morita:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

Your preference for the Salt Lake Alternative has been noted. While each of the alternatives discussed in the Draft EIS includes trade-offs between benefits and impacts, the Airport Alternative from East Kapolei to Ala Moana has been selected as the Preferred Alternative as described above. As compared to the alternatives discussed in the Draft EIS, the Airport Alternative will carry the most passengers, provide the greatest transit-user benefits, and result in the fewest vehicle hours of delay. It will provide access to employment centers at Pearl Harbor Naval Base and Honolulu International Airport and will serve the Salt Lake neighborhood with connecting bus service. Of the three Build Alternatives addressed in the Draft EIS, the Airport Alternative will have slightly less impacts to the natural and built environment analyzed in the Draft EIS. During the public comment period on the Draft EIS, the public overwhelmingly supported the Airport Alternative. Of the comments that specifically supported one of the alternatives, more than 75 percent were in support of the Airport Alternative. For more

information this selection is discussed in Section 2.4 of the Final EIS. Since publication of the Draft EIS, design has been advanced, further analysis has been completed, and information has been added in response to comments on the Draft EIS and agency coordination. The Final EIS discusses the process that was used to select the Preferred Alternative, how comments were considered in the decision-making process, impacts and mitigation commitments.

There will be no noise impacts to schools. The Project will have an integrated noise-blocking parapet wall at the edge of the guideway structure that extends 3 feet above the top of the rail and a system specification for vehicles with wheel skirts.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-333626

Ms. Janice Soon Fah
1318 Wanaka Street
Honolulu, Hawaii 96818

Dear Ms. Fah:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

Your preference for the Salt Lake Alternative has been noted. While each of the alternatives discussed in the Draft EIS includes trade-offs between benefits and impacts, the Airport Alternative from East Kapolei to Ala Moana has been selected as the Preferred Alternative as described above. As compared to the alternatives discussed in the Draft EIS, the Airport Alternative will carry the most passengers, provide the greatest transit-user benefits, and result in the fewest vehicle hours of delay. It will provide access to employment centers at Pearl Harbor Naval Base and Honolulu International Airport and will serve the Salt Lake neighborhood with connecting bus service. Of the three Build Alternatives addressed in the Draft EIS, the Airport Alternative will have slightly less impacts to the natural and built environment analyzed in the Draft EIS. During the public comment period on the Draft EIS, the public overwhelmingly supported the Airport Alternative. Of the comments that specifically supported one of the alternatives, more than 75 percent were in support of the Airport Alternative. For more

information this selection is discussed in Section 2.4 of the Final EIS. Since publication of the Draft EIS, design has been advanced, further analysis has been completed, and information has been added in response to comments on the Draft EIS and agency coordination. The Final EIS discusses the process that was used to select the Preferred Alternative, how comments were considered in the decision-making process, impacts and mitigation commitments.

Visual effects and displacements that would have resulted from the Salt Lake Alternative were addressed in Chapter 4 of the Draft EIS. However, as described above, the Preferred Alternative will serve the airport.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

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MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-333629

Mr. Len Pepper
1352 Olino Street
Honolulu, Hawaii 96818

Dear Mr. Pepper:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

Your comment about other activity centers in reference to Figure 1-4 of the Draft EIS is noted. , The figure is not intended to be all inclusive. It is intended to illustrate the nature of major activity centers in the corridor.

The travel demand forecasting model uses OahuMPO data that reflects population in the corridor in 2030. OahuMPO uses data from a variety of sources, including from the Department of Business, Economic Development and Tourism (DBEDT). DBEDT data reflects an aging population and changing socioeconomic conditions. The analysis presented in Chapter 1 of the Final EIS presents 2030 population and employment forecasts.

The fixed guideway system will provide improvements to transit availability and reliability that would serve all transportation system users, including the elderly and moderate- and low-

income populations. All fixed guideway stations will have similar design elements to make system use easier for all patrons, including infrequent users, the elderly, and persons with disabilities. All platforms will be at the same level as the vehicle floor to provide level boarding for all passengers and to accommodate wheelchairs. In addition to stairs and escalators, elevators will be provided at all stations to accommodate elderly and disabled riders.

As discussed in Section 4.4.2 of the Draft EIS, four of the five schools listed in your comment letter are along the Salt Lake Alternative route, which will not be affected by the Project. These schools will continue to be served by TheBus and other public transit services.

Last, peak hour analysis was performed in the Final EIS in order to evaluate the transit system during periods of highest demand and use. It is anticipated that the transit system will operate 7 days per week in conjunction with the schedules for TheBus.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-333640

Mr. Mark Taylor
3427 Ala Hinalo Street
Honolulu, Hawaii 96818

Dear Mr. Taylor:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

Your preference for the Salt Lake Alternative has been noted. While each of the alternatives discussed in the Draft EIS includes trade-offs between benefits and impacts, the Airport Alternative from East Kapolei to Ala Moana has been selected as the Preferred Alternative as described above. As compared to the alternatives discussed in the Draft EIS, the Airport Alternative will carry the most passengers, provide the greatest transit-user benefits, and result in the fewest vehicle hours of delay. It will provide access to employment centers at Pearl Harbor Naval Base and Honolulu International Airport and will serve the Salt Lake neighborhood with connecting bus service. Of the three Build Alternatives addressed in the Draft EIS, the Airport Alternative will have slightly less impacts to the natural and built environment analyzed in the Draft EIS. During the public comment period on the Draft EIS, the public overwhelmingly supported the Airport Alternative. Of the comments that specifically supported one of the alternatives, more than 75 percent were in support of the Airport Alternative. For more

information this selection is discussed in Section 2.4 of the Final EIS. Since publication of the Draft EIS, design has been advanced, further analysis has been completed, and information has been added in response to comments on the Draft EIS and agency coordination. The Final EIS discusses the process that was used to select the Preferred Alternative, how comments were considered in the decision-making process, impacts and mitigation commitments.

The statement in the Draft EIS was correct at the time it was written, namely that "FTA has agreed to consider a funding request of $1.2 billion but has not been approached regarding a higher level." FTA has not agreed to provide $1.2 billion or to provide more than that. The level of Federal funding described in the Draft EIS is used as an estimate of federal funds. Further, there is no plan to use property taxes to fund the Project construction.

FTA's general practice for the financial evaluation of proposed New Starts projects is to consider financial feasibility with anticipated receipt of FTA funding. Section 6.6 of the Final EIS describes the risks and uncertainties associated with New Starts funding.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010 RT10/09-336610

Mr. Ben Ramelb
1148 Ala Lilikoi Street
Honolulu, Hawaii 96818

Dear Mr. Ramelb:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

Regarding your first point, as described in Section 2.5.10, Project Phasing, and further in Section 8.6.9, Construction Phasing, in the Final EIS, to support phased opening, the first construction phase must be connected to a maintenance and storage facility, which requires considerable space. No location has been identified closer to Downtown with sufficient available space to construct a maintenance and storage facility. Therefore, construction will begin between East Kapolei and Leeward Community College. The Project will be constructed in phases to accomplish the following:

- *Match the anticipated schedule for right-of-way acquisition and utility relocations.*
- *Reduce the time that each area will experience traffic and community disturbances.*

- *Allow for multiple construction contracts with smaller contract size to promote more competitive bidding.*

- *Match the rate of construction to what can be maintained with local workforce and available financial resources.*

- *Balance expenditure of funds to minimize borrowing.*

The portion of the corridor in the Ewa direction of Pearl Highlands is less developed than the areas in the Koko Head direction. Right-of-way can be obtained more quickly at the west end of the Project; therefore, overall project construction can begin earlier, resulting in lower total construction costs. Construction is planned to continue uninterrupted in the Koko Head direction from Pearl Highlands to Aloha Stadium, Kalihi, and finally to Ala Moana Center.

As portions of the Project are completed, each will be opened incrementally so that system benefits, even if limited during the initial phases, will be realized prior to completion of construction of the entire Project.

The financial plan is balanced for the entire Project and subject to careful and ongoing scrutiny by the Federal Transit Administration (FTA), so there will not be a situation in which only a portion of the system will be built. If there is a shortfall, additional revenue sources will be considered. Section 6.6 of the Final EIS discusses risks and uncertainties and potential sources to cover shortfalls.

Regarding your second point, Section 1.7 of the Final EIS discusses the Purpose and Need of the Project. As stated in this section, the reason for the fixed guideway is not only to help relieve congestion, but to offer travelers an alternative to the car. There is currently no option but for most people to drive and congestion is increasing as a result.

Neither the Alternative Analysis nor the Draft or Final EISs show that rail would worsen traffic. Table 3-12 in the Alternatives Analysis shows that roadway conditions will be worse in 2030 whether the fixed guideway, managed lane, or more buses are implemented. However, traffic conditions will be better with the fixed guideway compared to conditions without it. The Alternatives Analysis showed that rail decreases congestion more effectively than any of the other options studied in the Alternatives Analysis. The Managed Lane Alternative would not eliminate congestion and bottlenecks on the H-1 Freeway. Table 3-12 in the Alternative Analysis Report shows that, under the No Build Alternative, there would be 18,049 vehicles per hour (vph) operating on the H-1 Freeway in 2030. Vehicle volumes rise to 18,327 vph (Two-direction Option) or 18,419 vph (Reversible Option) with the Managed Lane Alternative, while traffic volumes decrease to 17,209 vph with the 20-mile Fixed Guideway Transit Alternative. Accordingly, the Fixed Guideway Transit Alternative will reduce traffic volumes from those projected under the 2030 No Build Alternative.

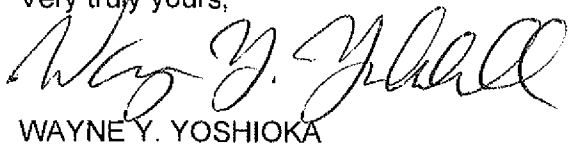
Localized bypasses would not meet system goals for corridor-wide benefits to mobility, reliability, access, and equity. The Hawaii Department of Transportation, which is responsible for the freeway system, has evaluated needs for the freeway system and identified the highway projects that would be most efficient at reducing congestion on Oahu. The projects, including a

Nimitz Flyover, are listed in Table 2-3 of the Draft EIS and included in the analysis for all project alternatives. Effects of the Nimitz Flyover on traffic conditions in 2030 are discussed in Section 3.4.2 of the Final EIS. Travel on the Nimitz Flyover was included in all forecasts of future travel conditions and is reflected in the times for the following travel pairs under the No Build Alternative: Kapolei to Downtown, Ewa to Downtown, and Mililani to Downtown. As shown in Figure 3-7 of the Final EIS, the Nimitz Flyover does improve transit travel times with the No Build Alternative between certain travel pairs (e.g., between Mililani and Downtown) compared to 2007 conditions. However, as also shown in this figure, travel times improve substantially more with the addition of the Project. The important finding in the Final EIS is that conditions on the highway will be better with rail compared to what they would be if the Project were not built even after the Nimitz Flyover, improvements to the H-1 Freeway, and all other projects in the OahuMPO Regional Transportation Plan are built.

As shown in Table 6-1 of the Final EIS, the Project will cost $4.6 billion in 2009 dollars and $5.5 billion in inflated dollars, including finance charges. The State of Hawaii's Highway Modernization Plan dated January 22, 2009, estimates the cost of the Nimitz Viaduct at $600 million for an approximately 2.5-mile elevated highway with two lanes, which equals $240 million per mile.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,



WAYNE Y. YOSHIOKA
Director

Enclosure

DEPARTMENT OF TRANSPORTATION SERVICES

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-333642

Mr. Mike Uechi
(No address or e-mail provided)

Dear Mr. Uechi:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

Property acquisition will occur early in the construction process. In all cases, the City will be required to follow the requirements of the Federal Uniform Relocation Assistance and Real Property Acquisition Policies Act. As stated in the Final EIS, Section 4.4 Acquisitions, Displacements, and Relocations, Environmental Consequences and Mitigation:

A partial acquisition typically is either a narrow strip of land or a more substantial portion of a large parcel. It is assumed that for the properties that would be partially acquired, existing land uses would not change. For residential properties, if the proposed right-of-way line comes within 5 feet of a residential structure, it is considered a full acquisition. If the right-of-way line is outside the 5 feet, it is considered a partial acquisition. For commercial properties, including situations where the commercial property could lose its function, full acquisition was considered.

Regarding other construction delays, the City is working closely with the Oahu Island Burial Council to develop the most effective ways to find, identify, protect, or relocate iwi kupuna (Hawaiian burials) if they are found well in advance of Project construction. Similar steps are being taken to minimize other risks.

To answer your second question, Section 6.6 of the Final EIS discusses risks and uncertainties associated with the financial analysis presented in Chapter 6. Changes in project schedule are one source of risk that is discussed. Chapter 6 also discusses other options for raising revenue should it be necessary to find additional funds. In addition to construction contingency, to minimize the risk of construction delays, the City will require contractors to pay liquidated damages if they cannot meet contract schedules. Furthermore, on a project of this size, the contractor's best incentive to complete work on time or even ahead of schedule is that they can generally make a higher profit if they do so.

The FTA and DTS appreciate your interest in the Project. The Final EIS has been issued in conjunction with the distribution of this letter. You may view the Final EIS on the Project website at www.honolulutransit.org. You may request a DVD of the Final EIS and additional content through the "Contact Us" tab on the website or by calling the Project hotline at 566-2299. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

DEPARTMENT OF TRANSPORTATION SERVICES

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

KENNETH TORU HAMAYASU
DEPUTY DIRECTOR

June 11, 2010

RT10/09-337213

Mr. Frank Genadio
92-1370 Kikaha Street
Kapolei, Hawaii 96707

Dear Mr. Genadio:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address comments regarding the above-referenced submittal:

No comparative magnetic levitation project has ever been built within the U.S. Therefore, no data is available to support a cost estimate. Some of the savings recognized in other countries for beam-track vehicles would not apply in the U.S. because of requirements to include an emergency egress walkway. While the system is inherently quieter, other systems may be designed to match the noise level of magnetic levitation when in operation. Also, the smaller structures proposed in the comment result in shorter span-lengths, which increases the number of columns required and the cost to construct both the additional foundations and columns.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this

letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

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MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

KENNETH TORU HAMAYASU
DEPUTY DIRECTOR

June 11, 2010

RT10/09-337214

Ms. Renee Ing
P.O. Box 23094
Honolulu, Hawaii 96823

Dear Ms. Ing:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

As discussed in Chapter 2 of the Final EIS, additional alternatives, including other technologies, were evaluated during the Alternatives Analysis phase of the Project. The Alternatives Analysis phase evaluated a range of transit mode and general alignment alternatives in terms of their costs, benefits, and impacts. An initial screening process considered alternatives identified through previous transit studies, a field review of the study corridor, an analysis of current population and employment data for the study corridor, a literature review of technology modes, work completed for the Oahu Regional Transportation Plan 2030 (ORTP) prepared by the Oahu Metropolitan Planning Organization (OahuMPO) (OahuMPO 2007), and public and agency comments received during the formal Alternatives Analysis scoping process.

During the fall of 2005 and winter of 2006, the City and County of Honolulu (City) completed the alternatives screening process that is documented in the Honolulu High-Capacity Transit Corridor Project Alternatives Screening Memorandum (DTS 2006a). Scoping meetings were held with the purpose of presenting alternatives to the public, interested agencies, and officials and receiving comments on the Purpose and Need, alternatives, and scope of the

Alternatives Analysis. Refinements were made to the alternatives as a result of public comments. Rubber-tire fixed guideway vehicles were considered a technology option throughout the Alternatives Analysis.

The following alternatives were studied in the Alternatives Analysis: No Build Alternative, Transportation System Management (TSM) Alternative, Managed Lane Alternative, and the Fixed Guideway Alternative. After review of the Alternatives Analysis Report and consideration of public comments, the City Council selected a fixed guideway transit system extending from Kapolei to UH Manoa with a connection to Waikiki as the Locally Preferred Alternative. The selection, which eliminated the TSM and Managed Lane Alternatives, became Ordinance 07-001 on January 6, 2007. The fixed guideway system is the most cost-effective system of all the alternatives studied.

As stated in Section 2.2.3 of this Final EIS, the NEPA Notice of Intent requested input on five transit technologies. A technical review process that included the opportunity for public comment was used in parallel with the alignment analysis to select a transit technology. The process included a broad request for information that was publicized to the transit industry. Transit vehicle manufacturers submitted 12 responses covering all of the technologies listed in the Notice of Intent. Rubber tire on concrete systems, including the Phileas system, were evaluated by an independent five-member technology panel comprised of four transit experts and a transportation academic that was appointed by the City Council. The panel considered the performance, cost, and reliability of the proposed technologies. The Phileas bus, was evaluated as a high capacity bus option. The guidance system that is under development is still experimental and not able to meet the operating requirements posed by the Review Panel. Likewise, fuel cell propulsion systems and other developing and promising technologies were considered but not retained as they are not yet available in full production form. The panel accepted public comment twice as part of its review. By a four-to-one vote, the panel chose a steel wheel operating on steel rail system. The four panel members selected steel-wheel technology because it is , safe, reliable, economical, and non-proprietary. Proprietary technologies, meaning those technologies that would have required all future purchases of vehicles or equipment to be from a single manufacturer, were eliminated because none of the proprietary technologies offered substantial proven performance, cost, and reliability benefits compared to steel wheel operating on steel rail. The Phileas system, by comparison does not yet have a functioning guidance operation. At this point in time, it effectively operates as a bus that cannot provide the reliability and safety of the guideway technology chosen by the panel. Based on manufacturer performance information, Phileas is also not materially quieter than the proposed steel wheel rail system. Furthermore, selecting a proprietary technology also would have precluded a competitive bidding process, likely resulting in increased overall project costs. The panel's findings were summarized in a report to the City Council dated February 22, 2008.

A guided-bus system operating on an exclusive guideway following the same alignment would not reduce adverse effects, including property acquisitions of the Project During the Alternatives Analysis process at the beginning of the project, a broad range of alignments were considered. When a historic property or park / recreational property was found to have a potential impact, alternate alignments were studied, as discussed and documented in 5.2, 5.3 and 5.5. of the Final EIS.

As stated in Section 4.10.3 of the Final EIS, the Project will cause no severe noise impacts. If no mitigation were provided, moderate impacts would occur at upper floors of a few high-rise buildings (as shown in Table 4-18 in the Final EIS).

The project design includes an integrated noise-blocking parapet wall at the edge of the guideway structure that extends three feet above the top of the rail. The parapet wall will substantially reduce ground-level noise. In areas with high-rise apartments and hotels that have lanais above the elevation of and facing the rail, the parapet wall will have a limited benefit (less than a 3-dBA noise reduction) at floors above the level of the guideway. Wheel skirts, which are part of the vehicles and cover the wheels, will increase the benefit from the parapet wall at locations above the elevation of the track. The use of sound-absorptive materials below the tracks in the three areas that would otherwise experience moderate noise impacts will reduce the Project noise levels from the upper floors to below the impact level. Once the Project is operating, noise levels will be re-measured to confirm that there are no noise impacts from the Project. If additional noise impacts occur, then FTA will require the evaluation of measures to mitigate the impacts.

With the required mitigation in place (noise blocking parapet wall, sound absorbing material and wheel skirts, as described below), the noise analysis indicates that the new noise generated by the Project will be lower than the existing (2009) noise levels in most locations and will not have any noise impacts to residences or businesses based on FTA noise criteria and guidance.

Chapter 8 of the Final EIS details the Project's public involvement activities, including scoping and Public Hearing dates. The Project conducted numerous Community Information Meetings, manned booths at public events, conducted Speakers Bureau presentations, and maintained a website and hotline to solicit public comment throughout the planning process.

The estimated implementation cost for guided buses operating in exclusive right-of-way is not substantiated. Actual cost of constructing an elevated exclusive busway serving the same area as the Project would be similar to the cost to implement the Project with the selected technology because the guideway would be of a similar size. If the guideway were designed to highway standards to accommodate any form of unguided vehicle, it would be larger and more costly. If multiple access points were provided, the right-of-way needs and cost would be substantially higher. The proposal to construct the busway in a cut-and-cover tunnel would further increase the cost relative to the elevated alternative considered through the Alternatives Analysis process.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, 3RD FLOOR
HONOLULU, HAWAII 96813
Phone: (808) 768-8305 • Fax: (808) 768-4730 • Internet: www.honolulu.gov

MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-333648
RT1/09-295442R

The Honorable K. Mark Takai
House of Representatives
State Capitol, Room 305
Honolulu, Hawaii 96813

Dear Representative Takai:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

The 138KV lines cannot be incorporated in the guideway structure. The National Electrical Safety Code and Occupational Safety and Health Administration require clearances around KV lines. In addition, the KV lines cannot be incorporated into an enclosed space due to the heat generated by these lines. As discussed in Section 4.18.2 of the Final EIS, "Communication and coordination have been initiated with the affected utility agencies and companies and will continue throughout design and construction." Further, "Design criteria will govern all new utility construction outside of buildings, as well as the support, maintenance, relocation, and restoration of utilities encountered and affected by construction of the fixed guideway." The design criteria will evaluate relocation of utilities that are in conflict with the fixed guideway.

As mentioned above, the Airport Alternative from East Kapolei to Ala Moana Center has been selected as the Preferred Alternative. While each of the alternatives discussed in the Draft EIS includes trade-offs between benefits and impacts, the Airport Alternative from East Kapolei to Ala Moana has been selected as the Preferred Alternative as described above. As compared to the alternatives discussed in the Draft EIS, the Airport Alternative will carry the most passengers, provide the greatest transit-user benefits, and result in the fewest vehicle hours of delay. It will provide access to employment centers at Pearl Harbor Naval Base and Honolulu International Airport and will serve the Salt Lake neighborhood with connecting bus service. Of the three Build Alternatives addressed in the Draft EIS, the Airport Alternative will have slightly less impacts to the natural and built environment analyzed in the Draft EIS. During the public comment period on the Draft EIS, the public overwhelmingly supported the Airport Alternative. Of the comments that specifically supported one of the alternatives, more than 75 percent were in support of the Airport Alternative. For more information this selection is discussed in Section 2.4 of the Final EIS. Since publication of the Draft EIS, design has been advanced, further analysis has been completed, and information has been added in response to comments on the Draft EIS and agency coordination. The Final EIS discusses the process that was used to select the Preferred Alternative, how comments were considered in the decision-making process, impacts and mitigation commitments. Any utility relocation associated with the Salt Lake Boulevard alignment will not be required for the Project.

In addition, the DTS will continue to work with the Hawaii State Department of Transportation and other groups regarding corridor features and aesthetics.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-333682

Scott
(No address or e-mail provided)

Dear Scott:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

Your comments have been noted. The Project will provide an alternative transportation mode and additional connection between UH West Oahu and Downtown. It will serve the Airport and provide park-and-ride facilities for commuters. The Project will include enhanced bus service integrated with the fixed guideway system. The local bus feeder system will connect neighborhoods and commercial districts to the fixed guideway system.

The Project has logical termini at East Kapolei and Ala Moana Center and independent utility from any extensions that may be constructed in the future. The future extensions to West Kapolei, Salt Lake Boulevard, Waikiki, and UH Manoa are discussed in the cumulative impacts sections of Chapters 3 and 4 of the Final EIS; however, the future extensions are not part of this Project; thus, they are not required to be evaluated under Chapter 343 of the Hawaii Revised Statutes and NEPA. Under NEPA, environmental analysis is only required when there is a proposed action by a Federal agency. Here, because the future extensions are not proposed

for implementation at this time, they are not part of the Project studied in the Final EIS. It would be premature to undertake an environmental analysis of the extensions (beyond the cumulative impacts analysis) because they are not part of the proposed action to be taken by the City and FTA. If the future extensions are proposed for implementation in the future, environmental analysis of the extensions and appropriate alternatives will be undertaken at that time. Bus service between Ala Moana Center and these destinations will be enhanced until those extensions are built.

The FTA and DTS appreciate your interest in the Project. The Final EIS has been issued in conjunction with the distribution of this letter. You may view the Final EIS on the Project website at www.honolulutransit.org. You may request a DVD of the Final EIS and additional content through the "Contact Us" tab on the website or by calling the Project hotline at 566-2299. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

DC#4399-R

RECEIVED
DEC 22 2008
PB AMERICAS, INC.
HONOLULU, HAWAII

Honolulu High-Capacity Transit Corridor Project

Draft Environmental Impact

Statement/Section 4(f) Evaluation

Public Meeting and Hearing

December 10, 2008

COPY

Filipino Community Center

Waipahu, Hawaii

6:00 p.m. - 6:29 p.m.

REPORTER'S TRANSCRIPT

OF

PUBLIC HEARING

BEFORE: BARBARA ACOBA, CSR No. 412, RPR

Notary Public, State of Hawaii

I N D E X

PAGE

OPENING COMMENTS:

By Hearing Officer Toru Hamayasu.....3

SPEAKERS:

Frank Genadio
92-1370 Kikaha St.
Kapolei, HI 96707

Young Kim
94-536 Lumiauau St., F102
Waipahu, HI 96797

Scott Miguel
94-011 Waipahu St., E205
Waipahu, HI 96797

Michael Burton
2889 Ala Ilima St., 16A
Honolulu, HI 96818

Natlynn Cunningham
94-1098 Awalua St.
Waipahu, HI 96797

Eric Minton
719 Mahiai St.
Honolulu, HI 96826

TORU HAMAYASU: Good evening. I'm Toru Hamayasu, the 2nd Deputy Director of the City and County of Honolulu Department of Transportation Services. I am the Hearing Officer for this public hearing for the Draft Environmental Impact Statement for the Honolulu High-Capacity Transit Corridor Project.

The purpose of this public hearing is to collect comments related to the proposed transit project regarding the draft EIS, Section 106 of the National Historic Preservation Act process, Section 4(f) of the U.S. Department of Transportation Act, right-of-way acquisition, and floodplains affected by the project.

Public input can be made in four ways. Public spoken testimony to me here in the public hearing room. If you do not wish to speak in the public, an individual spoken testimony for the record can be made to the hearing recorder, who is near the Public Involvement Station in the Project Information Area next door. Written testimony may be deposited into the black comment box at this meeting or delivered to the Department of Transportation Services office or mailed or faxed (808) 523-4730 to DTS by January 7th, 2009. And finally, testimony can be submitted online by January 7th, 2009, at www.honolulutransit.org.

All comments and responses will be included in

the final EIS. Revisions to the EIS will be made as appropriate, based on comments.

The hearing procedures are as follows: One, elected and public officials will be heard first. Persons desiring to testify should register at the entrance to the hearing room and will be called in order of registration.

Any individual may appear and speak for him or herself, or if duly authorized, for any local civic group, organization, club or association, subject to the rules provided herein. Speakers should give their name. If representing a group, this information should also be given.

Speakers must limit their statements to 3 minutes. Additional prepared statements or literature pertaining to the project may be submitted at this hearing or by 4:30 p.m., January 7th, 2009, to Department of Transportation Services. These statements will be made part of the official record if they include a legible name and address.

For these hearings, all statements, oral or written, should be directed to the Hearing Officer and must be related to the subject matter of the hearing.

Each person speaking before the audience must do so at the floor microphone. We will call testifiers

in groups of three to facilitate orderly progress. Please ensure you are in the hearing area at the time your name is called. A court stenographer will record and transcribe the hearing proceedings. If required, I will announce any of the specific rules governing this hearing.

As part of this public hearing process, the Honolulu Rail Transit Project Team is not allowed to respond to any questions or concerns raised by the speaker. The Project Team will be available to address your questions in the Project Information Area outside of this hearing venue.

It is now 6:14. At this time, I would like to begin the public testimony. The first testifier is Frank Genadio, followed by Young Kim, and Scott Miguel.

---oOo---

FRANK GENADIO: Frank Genadio of Kapolei. You have my address from a previous testimony. My remarks are directed to the attempted EIS to eliminate a technology that is not steel wheels on steel rails. The City Council fumbled away its chances to place the right question on the November ballot, leaving us with a take-it-or-leave-it choice for steel.

Actually, the Council should have placed two questions on the ballot. First would be: Do you support a fixed-rail transit system for Oahu? The second would be: If you answered "yes," do you favor a fair and open competition among all four types of rail technologies?

For those of you not familiar with what the Federal Transit Administration considers rail, it is not just steel wheels, but includes rubber tire on concrete, conventional monorail, and elevated magnetic levitation, the system I favor.

Based on responses to the City's request for information, there would be 10 technology suppliers, including five that do not propose steel-on-steel. Figure 29 of the EIS shows a solid structure that is 28 to 32 feet across as a bridge needed for steel wheel systems. The HSS (inaudible) maglev guideway in comparison would be only 21 feet across, including open

space between the beams on which the levitated train would ride. Picture the difference on Farrington Highway and the lessened impact on homes and businesses. And also consider the fact that the maglev is at least twice as quiet as steel-on-steel without any need for steel's noise mitigation measures.

Those of you with children or grandchildren in five to nine years might be interested in knowing that the EIS project for a 20-mile steel wheel bridge would cover at least 25 miles of guideway for the maglev. Using the same amount of labor and materials in the current plan, that is no loss of jobs or decrease sales of steel and concrete, this would enable extension of the guideway to the U.H. Manoa campus within the time line for the initial system. Since U.H. West Oahu will have limited curriculum, reaching Manoa is important to future college students from this area.

The first maglev -- the HSS (inaudible) maglev is not only faster and much quieter and cheaper to develop than steel-on-steel, it would also will be somewhere between $12 and 18 million per year cheaper to operate and maintain because of (inaudible) running. Cost to modify the EIS to accommodate other technologies is a drop in the bucket of the plan's estimated $7 billion budget.

I'm suggesting that this EIS be delayed and reworked and that the start of preliminary engineering either be deferred or that the study cover all technologies that met the City's initial requirements. Mahalo.

TORU HAMAYASU: Next speaker is Young Kim.

---oOo---

YOUNG KIM: Good evening. My name is Young Kim. I came here, this is my second time around to mass transit development plan. First one was in the late '80s, early '90 timeframe with Rene Mansho. At that time, I was able to convince the City Council not to develop the rail transit. And this time, my second time around, majority have expressed a willingness to build a transit, so I'm for it, but the plan organization little bit askewed or disorganized.

I lived in Japan for first 14 years and I enjoyed the mass transit system in Japan. Core area had all the transit system, but as the population increased, number of train route have tremendously increased beyond the Tokyo perimeter. When I left town, we had only one subway. Now I think there's nine to 11 different subway going all over Tokyo.

My question to you is: Where is this storage area and maintenance facility so that the mass transit have to begin from Leeward side? And I just found out from the other side there is a map showing that the Leeward Community College area is one. That's great. So why not build from there toward the core destination area? That way you can -- as soon as you open it, you can use it for the ridership toward the airport. There's more people working around the airport, Hickam,

Pearl Harbor area than any other place. Extend it to downtown and to the U.H. Manoa and Waikiki. You have better chance of success than try to do the Leeward from Kapolei to Waipahu. Thank you.

TORU HAMAYASU: Next speaker is Scott Miguel, followed by Michael Burton.

---oOo---

SCOTT MIGUEL: Good evening, everyone. I'm Scott Miguel. I supported this back in the '90s when the (inaudible). The question I have is: What do you tell the grandchildren that will have to pay for the system that you say the prices have changed from what's gonna be built to what's not gonna be built? And what's bugging me is, why change and why proofread the EIS report from the Federal Government when it doesn't have to be proofread? By now probably realize I didn't vote for it, but why proofread it when it was already done right by the U.S. Government? What were you hiding from the people? Because I feel that there's a lot of people out there that say, what are you gonna tell your mom and pa's generation of young kids, hey, you're gonna have to pay for something that maybe is gonna be used in Aiea, as a senator is proposing right now. Charles Djou is proposing Aiea to town. What's wrong with that? You promised the people of Kapolei something? Yeah, it's sad that five, maybe 10 people showed up, but what do you tell the younger generation when we get older, it was promised to me. Why wasn't it done then? There is no answers for a lot of things.

That's why tonight I'm hoping you can enlighten me so maybe I can believe something like this, because I have to believe. I don't believe it's possible. You

guys come up with different solutions, different way, different solutions. Did you guys really have a plan? Are you guys coordinating with the different agencies? Are you guys pulling the (inaudible), because when you guys are building this, there's a lot of places you guys gotta touch; a lot of different companies you guys gotta work with. Is there a coordination or is there anything that the City has, because so far the people haven't been told everything.

TORU HAMAYASU: Next speaker is Michael Burton.

---oOo---

MICHAEL BURTON: Hi, I'm Michael Burton and I just wanted to say that I do support the rail system. I do see it's a necessary utility for the people who do travel into downtown to work. However, I'm also a resident of Salt Lake, and I just want to put my point across.

One, Congressman Chachula is saying something about starting the project in, say, Aiea, and I agree with that because, after all, the Kapolei area is kind of desolate at this point and with the perspective of us running out of money through -- in the project, because there hasn't been a hundred percent guarantee, that's a wise decision.

Outside of that, I disagree with him with changing the route from Pearl Harbor -- to change the route from the Salt Lake route instead of going down Pearl Harbor. I believe that the Pearl Harbor route is a waste of time and misuse of people's money, the public's money, because it's bypassing populated areas such as Salt Lake, Foster Village, and the industrial area right around the Bougainville area and, of course, it's gonna hit Salt Lake, but I feel that if the rail is routed where the public can take advantage of it, where it's convenient, you know, would be better use of the public's money. And that's all I really have to say.

Thank you.

TORU HAMAYASU: The next speaker is Natlynn Cunningham.

---oOo---

NATLYNN CUNNINGHAM: Hi. I'm Natlynn Cunningham, and I live in the Royal Kunia area. I do not support the current rail system and do support the alternative currently being recommended to start closer to town from the Aiea/Salt Lake area. I believe that would generate more income while it's being built and support more ridership.

My question to you, as I'm a budget officer and for many years, I'm looking at the Federal money that we have not secured yet, that we're gonna go and secure in 2010. Suppose that we get it. The cost of the rail will -- historically costs have tripled, quadrupled. So instead of costing $5 billion, it may cost us $15 billion or $20 billion by the time it's ready to be done. Where is the rest of that money gonna come from? How much is the Government support, the Federal Government?

As I understand, the maintenance will be paid from the City's pot. Does anybody here think that we can afford to maintain the rail? Can we? I mean, every time we hit a pothole, I think people should think about it. Maintenance of the rail is way beyond what this city can support, and I don't want to see my children and my grandchildren have to leave Hawaii because the taxes are too high and they can't afford to live here.

It's already expensive. I mean, the future of our local people will be threatened by additional taxes. Thank you.

TORU HAMAYASU: Next speaker is Eric Minton.

---oOo---

ERIC MINTON: Aloha. I'm not really comfortable on this side of the microphone, but I am in support of a mass transit. I'm in favor of all forms of mass transit. I understand one thing Mayor Hannemann said, and I know he's right, steel-on-steel will be cheaper to maintain. But steel-on-steel is such a heavier train, and I have tried to get an answer from the various committees, what will the difference in construction costs be compared to the other forms against the maintenance?

I have had had an opportunity to ride trains in many, many cities. I went to high school in New York City. I went to college in L.A. Business has taken me to Toronto and Montreal, all cities that have all kinds of varieties. My favorite system, which I really wish we were considering, is the monorail. It's the smallest, lightest structure. It blocks the last community, you know, last line, stuff like that. It's cheapest to build.

But we'd better not do what we did, what, 20 years ago and shoot ourselves in the foot, because if we don't get some form of really mass transit, we'll go no place. The island will die. It has to happen, a better transit system. I live 30 miles from this room. It took me an hour and 20 minutes to get here. I figured

it would only take 40, and that's after calling up the offices to get directions to get here. I don't know where this area is. The meetings closer to me are all on work days.

So anyway, that's what I'm saying. I really hope that we look more at the monorail, but we cannot say no. Thank you.

TORU HAMAYASU: Thank you. That's the last of the registered speakers. Is there anyone else present who would like to provide a comment on the project issues? You sure? With nobody else interested in providing a comment, I conclude this hearing at 6:29. Thank you for your time and interest in this project.

(Meeting concluded at 6:29 p.m.)

C E R T I F I C A T E

STATE OF HAWAII)

CITY AND COUNTY OF HONOLULU)

I, BARBARA ACOBA, Certified Shorthand Reporter and Notary Public, State of Hawaii, do hereby certify:

That on Wednesday, December 10, 2008, at 6:00 p.m., the foregoing Public Meeting was taken down by me in machine shorthand and was thereafter reduced to typewriting under my supervision; that the foregoing represents, to the best of my ability, a true and correct transcript of the proceedings had in the foregoing matter.

I further certify that I am not an attorney for any of the parties hereto, nor in any way concerned with the cause.

Dated this 19th day of December, 2008, in Honolulu, Hawaii.

BARBARA ACOBA, CSR NO. 412
Notary Public, State of Hawaii
My Commission Exp: 10-22-2012

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

KENNETH TORU HAMAYASU
DEPUTY DIRECTOR

June 11, 2010

RT9/09-335154

Mr. Frank Genadio
92-1370 Kikaha Street
Kapolei, Hawaii 96707

Dear Mr. Genadio:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraph addresses comments regarding the above-referenced submittal:

As stated in Section 2.2.3 of this Final EIS, the NEPA Notice of Intent requested input on five transit technologies. A technical review process included the opportunity for public comment and was used in parallel with the alternatives analysis to select a transit technology. The process included a broad request for information that was publicized to the transit industry. Transit vehicle manufacturers submitted 12 responses covering all of the technologies listed in the Notice of Intent. An independent five-member technology panel composed of four transit experts and a transportation academic appointed by the City Council evaluated guided rubber-tire-on-concrete systems (e.g., Phileas bus system and VAL-type systems), monorail (which is a variation on rubber-tyred technology), steel-wheel-on-steel-rail systems, (e.g., light rail and rapid rail), and magnetic levitation (MAGLEV). The panel considered the performance, cost, and reliability of the proposed technologies.

Proprietary technologies, meaning those technologies that would have required all future purchases of vehicles or equipment to be from a single manufacturer, were eliminated because none of the proprietary technologies offered substantial proven performance, cost, and reliability benefits compared to steel wheel operating on steel rail.

The panel accepted public comment twice as part of its review. By a four-to-one vote, the panel chose a steel wheel vehicle operating on steel rail system because it was considered safe, reliable, economical, and non-proprietary. Those results are documented in the panel's report to the City Council dated February 22, 2008 entitled "Independent Technology Selection Panel Report".

The City established steel wheel on steel rail as the technology for the Project based on input from the technology panel. Therefore, the analysis of the Project in the Final EIS is based on steel wheel on steel rail technology. Further, FTA's NEPA regulations for projects proposed to be funded with major capital investment funds, the level of detail necessarily increases between the Draft EIS and the Final EIS through preliminary engineering work (23 CFR 771 (j)). Chapter 6 of the Final EIS discusses the cost and funding sources for the Project.

The smaller structures proposed in the comment would result in shorter span-lengths, which would increase the number of columns required and the cost to construct both the additional foundations and columns. With no comparative data available to support an operating cost estimate, there are no means to verify this statement regarding maglev's operating and maintenance costs compared to steel wheel. Also, while intercity maglev can operate at very high speeds, urban maglev functions very much like a steel wheel rail system.

The single operating urban magnetic levitation system has a maximum speed of 100 kilometers per hour (62 miles per hour) which is similar to the maximum operating speeds of 50 to 60 miles per hour for steel wheel on steel rail systems. While the system is quieter, other systems may be designed to match the noise level of magnetic levitation when in operation. Steel wheel systems are capable of providing a smooth ride and reliable service.

The capital plan for the Project is presented in Section 6.3 of the Final EIS, which includes a description of the amount of funding anticipated from various sources. The capital plan takes the current economic downturn into account. Section 6.6 discusses the risks and uncertainties associated with the financial analysis prepared for the Project, including risks related to changes in project scope. If the Project is over budget, other sources of revenue have been identified in 6.3.3 and 6.6.3, which could include private funds (i.e., contributions toward the cost of building stations) or airport funds; however, approximately $1 billion in year-of-expenditure dollars is included in the project budget as contingency for just such eventualities.

Additionally, with this Project, additional extensions are possible in the future. 23 CFR 771.111(f) states "The action evaluated in each EIS…shall not restrict consideration of alternatives for any other reasonable foreseeable transportation improvements". Future transit improvements, including an extension to the U.H. Manoa campus will not be precluded by the implementation of the Project.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, 3RD FLOOR
HONOLULU, HAWAII 96813
Phone: (808) 768-8305 • Fax: (808) 768-4730 • Internet: www.honolulu.gov

MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/090-335159

Mr. Young Kim
94-536 Lumiauau Street, F102
Waipahu, Hawaii 96797

Dear Mr. Kim:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

The potential locations of the maintenance and storage facility are shown in Figures 2-8 and 2-9 of the Final EIS. As described in Section 2.5.10, Project Phasing, and further in Section 8.6.9, Construction Phasing, in the Final EIS, to support phased opening, the first construction phase must be connected to a maintenance and storage facility, which requires considerable space. No location has been identified closer to Downtown with sufficient available space to construct a maintenance and storage facility. Therefore, construction will begin between East Kapolei and Leeward Community College. The Project will be constructed in phases to accomplish the following:

- *Match the anticipated schedule for right-of-way acquisition and utility relocations.*
- *Reduce the time that each area will experience traffic and community disturbances.*
- *Allow for multiple construction contracts with smaller contract size to promote more competitive bidding.*

- *Match the rate of construction to what can be maintained with local workforce and available financial resources.*

- *Balance expenditure of funds to minimize borrowing.*

The portion of the corridor in the Ewa direction of Pearl Highlands is less developed than the areas in the Koko Head direction. Right-of-way can be obtained more quickly at the west end of the Project; therefore, overall project construction can begin earlier, resulting in lower total construction costs. Construction is planned to continue uninterrupted in the Koko Head direction from Pearl Highlands to Aloha Stadium, Kalihi, and finally to Ala Moana Center.

As portions of the Project are completed, each will be opened incrementally so that system benefits, even if limited during the initial phases, will be realized prior to completion of construction of the entire Project.

The Project will terminate at Ala Moana Center. Available funding is insufficient to extend to UH Manoa or Waikiki at this time. The Project has logical termini and independent utility from any extensions that may be constructed in the future. The future extensions to East Kapolei, Salt Lake Boulevard, Waikiki, and UH Manoa are discussed in the cumulative impacts sections of Chapters 3 and 4 of the Final EIS. However, the future extensions are not part of the Project; thus, they are not required to be evaluated under Chapter 343 of the Hawaii Revised Statutes and NEPA. Under NEPA, environmental analysis is only required when there is a proposed action by a Federal agency. Here, because the future extensions are not proposed for implementation at this time, they are not part of the Project studied in the Final EIS. It would be premature to undertake an environmental analysis of the extensions (beyond the cumulative impacts analysis) because they are not part of the proposed action to be taken by the City and FTA. When the extensions are proposed for implementation in the future, environmental analysis of the extensions and appropriate alternatives will be undertaken at that time. UH Manoa and Waikiki will be connected by more frequent bus service until the extensions are completed.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT10/09-338273

Mr. Scott Miguel
94-011 Waipahu Street
Waipahu, Hawaii 96797

Dear Mr. Miguel:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

While each of the alternatives discussed in the Draft EIS includes trade-offs between benefits and impacts, the Airport Alternative from East Kapolei to Ala Moana has been identified as the Preferred Alternative as described above. Compared to the other alternatives discussed in the Draft EIS, the Airport Alternative will carry more passengers, provide the greatest transit-user benefits, and result in the fewest vehicle hours of delay. It will provide access to employment centers at Pearl Harbor Naval Base and Honolulu International Airport and will serve the Salt Lake neighborhood with connecting bus service. Of the three Build Alternatives addressed in the Draft EIS, the Airport Alternative will have slightly lower impacts to the natural and built environment. During the public comment period on the Draft EIS, the public overwhelmingly supported the Airport Alternative. Of the comments that specifically supported one of the alternatives, more than 75 percent were in support of the Airport Alternative.

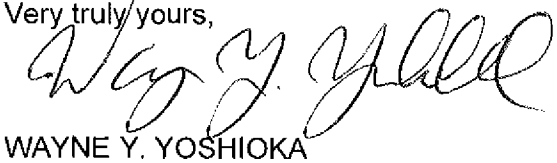
The Alternatives Analysis phase, which preceded the EIS process, is documented in Chapter 2 of the Final EIS. It evaluated a range of modal and general alignment alternatives, in terms of their costs, benefits, and impacts. The scoping process for the Alternatives Analysis involved a presentation of the viable alternatives to the public and interested public agencies and officials to receive comments on the Purpose and Need, alternatives, and scope of the analysis. Scoping for the EIS followed the FTA process that provides for a culling of alternatives studied in the EIS through an Alternatives Analysis. The scoping process initiated for the Alternatives Analysis included a variety of highway, bus and fixed guideway options for consideration. During the later scoping effort for the EIS, the public was requested to propose alternatives that would satisfy the purpose and need at less cost or with greater effectiveness, less environmental or community impact and to propose alternatives that were not previously studied and eliminated for good cause. The only alternative that emerged that met these criteria was a fixed-guideway alternative following several alternative alignments. All reasonable alternatives that emerged from these processes were ultimately evaluated in the Draft and Final EISs.

Since publication of the Draft EIS, design has been advanced, further analysis has been completed, and information has been added in response to comments on the Draft EIS and agency coordination. The Final EIS discusses the process that was used to select the Preferred Alternative, how comments were considered in the decision-making process, impacts, and mitigation commitments.

The project is coordinating with all affected agencies in developing the plan to build the Rail Transit project. Details regarding the Project's coordination can be found in Appendices F and G of the Final EIS.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,



WAYNE Y. YOSHIOKA
Director

Enclosure

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT10/09-338274

Mr. Michael Burton
2889 Ala Ilima Street, 16A
Honolulu, Hawaii 96818

Dear Mr. Burton:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraph addresses your comments regarding the above-referenced submittal:

Your support for the rail system has been noted. While each of the alternatives discussed in the Draft EIS includes trade-offs between benefits and impacts, the Airport Alternative from East Kapolei to Ala Moana has been selected as the Preferred Alternative as described above. As compared to the alternatives discussed in the Draft EIS, the Airport Alternative will carry the most passengers, provide the greatest transit-user benefits, and result in the fewest vehicle hours of delay. It will provide access to employment centers at Pearl Harbor Naval Base and Honolulu International Airport and will serve the Salt Lake neighborhood with connecting bus service. Of the three Build Alternatives addressed in the Draft EIS, the Airport Alternative will have slightly less impacts to the natural and built environment analyzed in the Draft EIS. During the public comment period on the Draft EIS, the public overwhelmingly supported the Airport Alternative. Of the comments that specifically supported one of the alternatives, more than 75 percent were in support of the Airport Alternative. For more

information this selection is discussed in Section 2.4 of the Final EIS. Since publication of the Draft EIS, design has been advanced, further analysis has been completed, and information has been added in response to comments on the Draft EIS and agency coordination. The Final EIS discusses the process that was used to select the Preferred Alternative, how comments were considered in the decision-making process, impacts and mitigation commitments.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-335164

Ms. Natlynn Cunningham
94-1098 Awalua Street
Waipahu, Hawaii 96797

Dear Ms. Cunningham:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

As described in Section 2.5.10, Project Phasing, and further in Section 8.6.9, Construction Phasing, in the Final EIS, to support phased opening, the first construction phase must be connected to a maintenance and storage facility, which requires considerable space. No location has been identified closer to Downtown with sufficient available space to construct a maintenance and storage facility. Therefore, construction will begin between East Kapolei and Leeward Community College. The Project will be constructed in phases to accomplish the following:

- *Match the anticipated schedule for right-of-way acquisition and utility relocations.*
- *Reduce the time that each area will experience traffic and community disturbances.*
- *Allow for multiple construction contracts with smaller contract size to promote more competitive bidding.*
- *Match the rate of construction to what can be maintained with local workforce and available financial resources.*
- *Balance expenditure of funds to minimize borrowing.*

The portion of the corridor in the Ewa direction of Pearl Highlands is less developed than the areas in the Koko Head direction. Right-of-way can be obtained more quickly at the west end of the Project; therefore, overall project construction can begin earlier, resulting in lower total construction costs. Construction is planned to continue uninterrupted in the Koko Head direction from Pearl Highlands to Aloha Stadium, Kalihi, and finally to Ala Moana Center.

As portions of the Project are completed, each will be opened incrementally so that system benefits, even if limited during the initial phases, will be realized prior to completion of construction of the entire Project.

The FTA imposes guidelines for estimating costs to prevent the type of overruns mentioned in the comment. They include conservative cost factors and high contingencies. Cost estimates are carefully reviewed by various FTA representatives, and risks and uncertainties are considered in developing financial plans for the Project, as discussed in Chapter 6 of the Final EIS, which also contains additional financial information. The Federal government will contribute about 30% percent of the total capital cost.

The estimated operating and maintenance cost for the fixed guideway is $77 million a year for the entire 20-mile system. This is addressed in Chapter 6 of the Final EIS along with the basis for the numbers. As noted in Chapter 6 of the Final EIS, City policy states that the transit system as a whole must recover between 27 and 33 percent of operations costs from farebox revenue. A 30 percent recovery from fares will generate about $23 million a year. The remainder, the subsidy required for the full fixed guideway system or about $54 million, will be budgeted for in the annual City budgeting process, as is currently done for TheBus. Fixed guideway operating costs will represent between 2 and 3 percent of the City's annual operating budget and about 25% of the transit budget.

Section 6.4 of the Final EIS describes the funding sources to pay for ongoing operating and maintenance costs associated with maintaining the resulting transit system in a state of good repair. Operating and maintenance costs will be paid for from the same funding sources currently used for TheBus: Federal funding, fare revenues, and subsidies from the City's General and Highway Funds.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-335170

Mr. Eric Minton
719 Mahiai Street
Honolulu, Hawaii 96826

Dear Mr. Minton:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraph addresses your comments regarding the above-referenced submittal:

In parallel with the alignment analysis, as stated in Section 2.2.3 of this Final EIS, the NEPA Notice of Intent requested input on five transit technologies. A technical review process included the opportunity for public comment and was used in parallel with the alternatives analysis to select a transit technology. The process included a broad request for information that was publicized to the transit industry. Transit vehicle manufacturers submitted 12 responses covering all of the technologies listed in the Notice of Intent. An independent five-member technology panel composed of four transit experts and a transportation academic appointed by the City Council evaluated guided rubber-tire-on-concrete systems (e.g., Phileas bus system and VAL-type systems), monorail (which is a variation on rubber-tyred technology), steel-wheel-on-steel-rail systems, (e.g., light rail and rapid rail), and magnetic levitation (MAGLEV) . The panel considered the performance, cost, and reliability of the proposed technologies.

Proprietary technologies, meaning those technologies that would have required all future purchases of vehicles or equipment to be from a single manufacturer, were eliminated because none of the proprietary technologies offered substantial proven performance, cost, and reliability benefits compared to steel wheel operating on steel rail.

The panel accepted public comment twice as part of its review. By a four-to-one vote, the panel chose a steel wheel vehicle operating on steel rail system because it was considered safe, reliable, economical, and non-proprietary. Those results are documented in the panel's report to the City Council dated February 22, 2008 entitled "Independent Technology Selection Panel Report".

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Honolulu High-Capacity Transit Corridor Project

Draft Environmental Impact

Statement/Section 4(f) Evaluation

Public Meeting and Hearing

December 10, 2008

Filipino Community Center

94-428 Mokuola Street

Waipahu, Hawaii

6:30 p.m. - 8:00 p.m.

REPORTER'S TRANSCRIPT

OF

PRIVATE TESTIMONIALS

BEFORE: ELSIE TERADA, CSR NO. 437
Certified Shorthand Reporter

I N D E X

Page

SPEAKERS:

Glenn Oamilda 3
91-1179 Puamaeole Street, #24V
Ewa Beach, Hawaii 96706

Michael Burton 5
2889 Ala Ilima Street, #16A
Honolulu, Hawaii 96818

GLENN OAMILDA: I'm opposed to the rail, as it is, the proposed city, simply because, No. 1, it's not environmentally friendly. In other words, it's concrete in the sky. And the highest point on that rail, the way they got it designed, is about a seven-story building, the highest point, 80 feet. So I don't think that's environmental friendly. Plus, the condemnation, the city condemnation for people in Waipahu especially, where I'm from, and especially in Ewa Beach, I think it's going to do harm to the elders and the old people that have accustomed to living in this kind of environment.

And the other thing, too, where the rail is going to start from, east Kapolei, it's ag. land. And I think that's No. 1 priority where we should preserve agriculture land. So that's where the start is going to be. Plus, not only that, the Ewa development plans does not call for a transit. The Ewa development plan does not call for a transit, a rail transit in the second city on the Ewa Plains, so that's why I'm opposed to it. Plus, I don't think it will relieve traffic. By 2030, they said it's going to be only 20

percent reduction, 20 or 23 percent, and I think that's a small number. I think that's really a small number to be dumping all that money into a system that's going to be eventually borne on the public, the cost is going to be borne on the public.

The other thing, too, is the maintenance of that system, I don't think the public is ready to maintain that system for the longevity of the rail, in perpetuity. And I don't think that's fair to have the public bear the cost of the rail.

So those are the three things, and I'm really opposed to, No. 1, again, is the cost; No. 2, is the environment; and No. 3, I don't think it will relieve traffic, you know, but what the alternative designation mitigation said it will, it would deter the traffic, I don't think that's a fair assessment.

Plus, in this economic downturn, I think the money should be wisely spent on our roads and our sewer. The EPA has fined the city a billion dollars to upgrade the system, the sewer system, to complete the total secondary treatment, and the city have reneged on that idea. And of course the roads, the roads are critical to the communities.

So those are the other things that I totally oppose to the rail. So, that's it.

I was born and raised in Waipahu, and I now live in Ewa Beach.

-oOo-

MICHAEL BURTON: Well, first off, I just wanted to say that I do support the rail, and I think it's a necessary utility, you know, coming in from the corridor of Kapolei to downtown and onward to U.H. I was listening to a lot of talk radio in regards to changes that Councilman Djou was recommending, and he did say that he wanted to see the rail start, the project start somewhere in Pearl City-Aiea rather than all the way out by Kapolei, and I think that's a wise part, a wise insight on his part, because it's a better use of public's money. The reason why, is because from Pearl City going into town, that's where you pick up the majority of the riders. So with that, you'll get higher usage out of it, and as you build that portion and going into town, after you complete that, and hopefully you don't run out of money in the process because nothing has been a hundred percent guaranteed, after that portion is completed, then we can go back and finish the

Kapolei and phase of the operation.

The one thing I was in objection to, was, is routing of the rail through Pearl Harbor to the airport. I feel that it should go through Salt Lake, and the reason why, is because there's a dense population of people in the Salt Lake area and along that route, that can take better advantage of the rail, if was stopped, conveniently adjusted for them, to meet their needs.

One of the things that I did notice in the Salt Lake route, is that there's only one stop, at Aliamanu, I believe that's what it is, Aliamanu-Salt Lake, that stop right there. Whereas the Pearl Harbor route has three. Now, in my opinion, if they decide to go with the Salt Lake route rather than the Pearl Harbor route, could one of those stops, the Arizona Memorial stop, be transferred over to Salt Lake, somewhere in between, I think it's Radford High School, Foster Village, put a stop right over there, that's the Bougainville industrial area, and then continue on to Salt Lake and then onward? Because that whole Foster Village is kind of left out, it's just passed over, with the rail, and I think

with a stop in that area, it will better support the whole rail system.

-oOo-

STATE OF HAWAII)
) ss.
COUNTY OF HONOLULU)

I, Elsie Terada, Certified Shorthand Reporter, Certificate No. 437, for the State of Hawaii, hereby certify:

I am the person that stenographically recorded the proceedings.

The foregoing transcript is a true record of said proceedings.

Dated this 26th day of December, 2008, in Honolulu, Hawaii.

ELSIE TERADA, CSR NO. 437
Notary Public, State of Hawaii

My Commission Expires: 4-07-2010

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, 3RD FLOOR
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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-332715

Mr. Michael Burton
2889 Ala Ilima Street, #16A
Honolulu, Hawaii 96818

Dear Mr. Burton:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

As described in Section 2.5.10, Project Phasing, and further in Section 8.6.9, Construction Phasing, in the Final EIS, to support phased opening, the first construction phase must be connected to a maintenance and storage facility, which requires considerable space. No location has been identified closer to Downtown with sufficient available space to construct a maintenance and storage facility. Therefore, construction will begin between East Kapolei and Leeward Community College. The Project will be constructed in phases to accomplish the following:

- *Match the anticipated schedule for right-of-way acquisition and utility relocations.*
- *Reduce the time that each area will experience traffic and community disturbances.*

- *Allow for multiple construction contracts with smaller contract size to promote more competitive bidding.*
- *Match the rate of construction to what can be maintained with local workforce and available financial resources.*
- *Balance expenditure of funds to minimize borrowing.*

The portion of the corridor in the Ewa direction of Pearl Highlands is less developed than the areas in the Koko Head direction. Right-of-way can be obtained more quickly at the west end of the Project; therefore, overall project construction can begin earlier, resulting in lower total construction costs. Construction is planned to continue uninterrupted in the Koko Head direction from Pearl Highlands to Aloha Stadium, Kalihi, and finally to Ala Moana Center.

As portions of the Project are completed, each will be opened incrementally so that system benefits, even if limited during the initial phases, will be realized prior to completion of construction of the entire Project.

Your preference for the Salt Lake Alternative has been noted. While each of the alternatives discussed in the Draft EIS includes trade-offs between benefits and impacts, the Airport Alternative from East Kapolei to Ala Moana has been identified as the Preferred Alternative as described above. Compared to the other alternatives discussed in the Draft EIS, the Airport Alternative will carry the most passengers, provide the greatest transit-user benefits, and result in the fewest vehicle hours of delay. It will provide access to employment centers at Pearl Harbor Naval Base and Honolulu International Airport and will serve the Salt Lake neighborhood with connecting bus service. Of the three Build Alternatives addressed in the Draft EIS, the Airport Alternative will have slightly lower impacts to the natural and built environment. During the public comment period on the Draft EIS, the public overwhelmingly supported the Airport Alternative. Of the comments that specifically supported one of the alternatives, more than 75 percent were in support of the Airport Alternative.

The Alternatives Analysis phase, which preceded the EIS process, is documented in Chapter 2 of the Final EIS. It evaluated a range of modal and general alignment alternatives, in terms of their costs, benefits, and impacts. The scoping process for the Alternatives Analysis involved a presentation of the viable alternatives to the public and interested public agencies and officials to receive comments on the Purpose and Need, alternatives, and scope of the analysis. Scoping for the EIS followed the FTA process that provides for a culling of alternatives studied in the EIS through an Alternatives Analysis. The scoping process initiated for the Alternatives Analysis included a variety of highway, bus and fixed guideway options for consideration. During the later scoping effort for the EIS, the public was requested to propose alternatives that would satisfy the purpose and need at less cost or with greater effectiveness, less environmental or community impact and to propose alternatives that were not previously studied and eliminated for good cause. The only alternative that emerged that met these criteria was a fixed-guideway alternative following several alternative alignments. All reasonable alternatives that emerged from these processes were ultimately evaluated in the Draft and Final EISs.

Since publication of the Draft EIS, design has been advanced, further analysis has been completed, and information has been added in response to comments on the Draft EIS and agency coordination. The Final EIS discusses the process that was used to select the

Preferred Alternative, how comments were considered in the decision-making process, impacts, and mitigation commitments.

Various locations for the stations were evaluated for the Salt Lake alignment. Limited space for stations and bus connections, along with poor pedestrian access, restricted possible station locations for this alignment.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

DEPARTMENT OF TRANSPORTATION SERVICES

MUFI HANNEMANN
MAYOR

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WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT10/09-337209

Mr. Glenn Oamilda
91-1179 Puamaeole Street, #24V
Ewa Beach, Hawaii 96706

Dear Mr. Oamilda:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

The island's unique visual character and scenic beauty was considered in the visual and aesthetic analysis presented in the Draft and Final EISs. The assessment of visual effect due to the Project as described in Section 4.8.3 of the Final EIS considers changes to the visual landscape and viewer responses to those changes. This includes the existing development along the Project alignment. Within the Project corridor the environment changes from rural at the Wai'anae end of the corridor to dense high-rise development at the Koko Head end.

As part of the design process, the City has developed design principles, which are identified in the Honolulu High-Capacity Transit Corridor Project Compendium of Design Criteria (RTD 2009m) that will be implemented in final design to minimize visual effects of the Project. For example, guideway materials and surface textures will be selected in accordance with generally accepted architectural principles to achieve effective integration between the guideway and its surrounding environment. Landscape and streetscape improvements will mitigate potential visual impacts, primarily for street-level views. Other measures to address visual impacts of the Project are being developed through the station design

and planning process. The initial station area plans and design guidelines were first developed with coordination between DTS and the Department of Planning and Permitting (DPP). The next level of transit station design focuses on integrating individual neighborhood characteristics of the communities served by the stations.

The following mitigation framework will be included in the Project to minimize negative visual effects and enhance the visual and aesthetic opportunities that it creates:

- *Develop and apply design guidelines that will establish a consistent design framework for the Project with consideration of local context.*
- *Coordinate the project design with City TOD planning and DPP.*
- *Consult with the communities surrounding each station for input on station design elements.*
- *Consider specific sites for landscaping and trees during the final design phase when plans for new plantings will be prepared by a landscape architect. Landscape and streetscape improvements will serve to mitigate potential visual impacts.*

Section 4.8.3 of the Final EIS, Design Principles and Mitigation includes information related to the mitigation framework described above. Specifically architecture and landscape design criteria include guidelines regarding site design, materials and finishes, and lighting, which apply to stations, station areas, and the guideway.

In addition, as stated in Section 4.4.3 of the Final EIS: Where relocations will occur, compensation will be provided to affected property owners, businesses, or residents in compliance with all applicable Federal and State laws and will follow the Federal Uniform Relocation Assistance and Real Property Acquisition Policies Act. The measures related to relocations include the following:

- *The City will assist all affected persons in locating suitable replacement housing and business sites within an individual's or business's financial means.*
- *A minimum 90-day written notice will be provided before any business or resident will be required to move.*
- *Relocation services will be provided to all affected business and residential property owners and tenants without discrimination; and persons, businesses, or organizations that are displaced as a result of the Project will be treated fairly and equitably*

Where landscaping, sidewalks, and driveway access will be affected by the Project, coordination will occur with the landowner, and these property features will be replaced, restored, and/or the property owner will be compensated.

As presented in Section 4.6.3 of the Final EIS, "The project alignment follows Farrington Highway through the Waipahu neighborhood. The area is urbanized, with land uses along the highway consisting primarily of commercial uses, strip retail plazas, and both mid-rise and medium density apartments." As shown in Appendix C of the Final EIS, Sheets RW-008 through RW-014a, right-of-way acquisition needs are primarily associated with the proposed West Loch, Waipahu, and Leeward Community College transit stations, with the exception of the need to place a proposed maintenance and storage facility just Ewa of the Leeward Community College Station. This area is a 43-acre vacant parcel, and the acquisition will not affect existing land uses. Condemnation is a last resort. The City must follow the Federal Uniform Relocation Assistance and Real Property Acquisition Policies Act and assist residents to find adequate, safe, and sanitary housing.

Regarding your concern for agricultural lands and development, the DPP has been working with the Waipahu community on a TOD plan that will help the local community shape the future of areas around the stations. The existing agricultural lands shown in the City's land use maps are slated for development and will be re-zoned in the future. As part of the development of this area, some land uses will need to change to accommodate the Project. It should be noted, however, that impacts to the natural and built environments will be minimized whenever possible. Zoning changes that are currently being considered are the responsibility of DPP. The preservation of agricultural land was considered in development of the project alignment. Less than 1% of agricultural land will be affected by the Project. Section 4.2 in the Final EIS discusses specific plans and policies set forth for a rapid transit system, with land set aside specifically to accommodate rail. Also see Figure 4-2 for the Planning Regions and Planned Land Use map. As quoted, "Land has been set aside in the City of Kapolei for a transit station/bus terminal/park and ride facility...."

Conditions on Oahu's highways will be worse in 2030 under any circumstance and regardless of which solution is applied; however, conditions will be substantially better with the fixed guideway than with the other potential solutions studied. As shown in Table 3-10 in the Alternatives Analysis Report, the Transportation System Management Alternative would only reduce vehicle hours of delay (VHD) by 2.4 percent, and the Two-direction Managed Lane Alternative would reduce VHD by 4.3 percent. According to Table 3-14 in the Final EIS, the Project will reduce VHD by 18 percent.

Regarding your concerns about maintenance of the system, the long-term operating and maintenance cost for a rail system is less on a per-passenger basis than for a bus system. As shown in Figure 6-2 of the Final EIS, the majority of on-going transit operating and maintenance costs will be for TheBus (about 70% of the total transit budget). The operating costs for the rail system will be funded through the same sources used for TheBus: Federal funding, fare revenues, and City revenues from the General and Highway Funds.

Lastly, enabling legislation for the County's General Excise and Use Tax Surcharge and Ordinance 07-001 preclude the use of the funds for purposes other than a fixed-guideway transit system.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Honolulu High-Capacity Transit Corridor Project

Draft Environmental Impact

Statement/Section 4(f) Evaluation

Public Meeting and Hearing

December 11, 2008

Bishop Museum

1525 Bernice Street

Honolulu, Hawaii

6:00 - 8:00 p.m.

REPORTER'S TRANSCRIPT

OF

PUBLIC HEARING

BEFORE: NANCY P. BLANKENSHIP, CSR NO. 459

Certified Shorthand Reporter

I N D E X

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	By Hearing Officer Toru Hamayasu	3
SPEAKERS:		
Arnold E. Widder 1888 Kalakaua Ave., #1105 Honolulu 96815 979-2007		6
Robert Wong 4530 Waikui St Honolulu 96821 robertdwa@hawaii.rr.com		8
Russell Holman P. O. Box 1201 Honolulu, Hawaii		10

18:10:20

HEARING OFFICER HAMAYASU: Good evening, I am Toru Hamayasu, the Second Deputy Director of the City and County of Honolulu Department of Transportation Services. I am the hearing officer of this public hearing for the Draft Environmental Impact Statement for the Honolulu High-Capacity Transit Corridor Project.

The purpose of this public hearing is to collect comments related to the proposed transit project regarding: the draft EIS; Section 106 of the National Historic Preservation Act process; Section 4(f) of the U.S. Department of Transportation Act; right-of-way acquisition; and floodplains affected by the project.

Public input can be made in four ways: 1) Public spoken testimony to me here in the public hearing room; 2) if you do not wish to speak in public, an individual spoken testimony for the record can be made to the hearing recorder who is near the public involvement station in the public information area across the hallway; 3) written testimony may be deposited in the black comment box at this meeting, delivered to the Department of Transportation Services office, or mailed or faxed (808) 523-4730 to DTS by January 7, 2009; and finally, 4) testimony can be

Honolulu, Hawaii (808) 524-2090

submitted online by January 7, 2009 at www.honolulutransit.org.

All comments and responses will be
18:05:59 included in the Final EIS. Revisions to the EIS will be made as appropriate based on comments. The hearing procedures are as follows:

1. Elected and public officials will be heard first. Persons desiring to testify should register at the entrance to the hearing room, and will be called in order of registration.

2. Any individual may appear and speak for him or herself, or if duly authorized, for any
18:06:29 local civic group, organization, club or association, subject to the rules provided herein. Speakers should give their name. If representing a group, this information should also be given.

3. Speakers must limit their statements to three minutes. Additional prepared statements or literature pertaining to the project may be submitted
18:06:55 at this hearing or by 4:30 p.m., January 7, 2009 to Department of Transportation Services. These statements will be made part of the official record if they include a legible name and address.

4. For these hearings, all statements, oral or written, should be directed to the hearing

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officer and must be related to the subject matter of the hearing.

5. Each person speaking before the audience must do so at the floor microphone. We will call testifiers in groups of three to facilitate orderly progress. Please ensure you are in the hearing room at the time your name is called. A court stenographer will record and transcribe the hearing proceedings. If required, I will announce any other specific rules governing this hearing.

6. As part of this public hearing process, the Honolulu High-Capacity Transit Project team is not allowed to respond to any questions or concerns raised by the speaker. The project team will be available to address your questions in the project information area outside of this hearing venue.

It is now 6:05 p.m. At this time I would like to begin the public testimony. The first testifier is Arnold Widder followed by Robert Wong.

18:08:34 MR. WIDDER: Mr. Hamayasu, since --
number 1, since the EIS draft concluded that the rail
18:04:59 could --
HEARING OFFICER HAMAYASU: Please state
your name for the record.
MR. WIDDER: Arnold E. Widder,
W-I-D-D-E-R.
HEARING OFFICER HAMAYASU: Thank you.
MR. WIDDER: Number one since the EIS
draft concluded that the rail would cut traffic by
only 1 percent and since there couldn't be a worse
time to burden local taxpayers with probable increases
to excise taxes to pay our billions of dollars of
steel rail debt, I'm still against the rail system.
I'm concerned that the expensive media advertising of
18:05:30 how great the rail system was overwhelmed the voters.
Number two, a vote was taken and seems to
be irrevocable, however, I pray that the airport and
UH will be placed back into the original plans and
Salt Lake will become the spur. The only reason why
Salt Lake was submitted was because the Salt Lake
Councilmember coerced the mayor to adopt it or lose
the steel rail system that the majority of
18:05:58 councilmembers did not originally want.
Number three, has anybody publicly showed

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concern that if Hawaiian bones are found in the pathways that it would greatly slow down the process.

Number four, the Honolulu mayor is presently trying to get millions of dollars for very worthy public works projects. If the federal government gives Honolulu a major funding for our rail, I believe they will give us far less for our other community work projects which will probably go to other needy citizens.

18:06:29

Thank you.

To other needy cities.

HEARING OFFICER HAMAYASU: I'm sorry, would you like to state that so that she can hear it?

MR. WIDDER: I think I said citizens. I meant cities, to go to other needy cities.

HEARING OFFICER HAMAYASU: The next speak, Robert Wong.

MR. WONG: Good evening. That was fast. Thank you for the opportunity to listen to my comments. I appreciate everybody's work in putting
18:07:00 all this information together. It's quite staggering. I did attend one town meeting with the mayor, so I'm a little bit informed but not quite totally. I've lived in New York City for almost ten years and I used the metro NTA, New Jersey transit path, metro north, and I
18:07:25 have a degree in quality control, so I think it's -- I don't have actual experience in urban planning or transportation industry, but my theory kind of helped me formulate my thoughts.

The mayor said that the system would be mostly built at elevation versus at grade as a result of public consensus, and they didn't want to sacrifice the existing lane or two to locate the train tracks, and he also signaled that the system would have to
18:07:59 work with the bus authority in order to execute a smooth process getting people to and from the trains. I have two concerns that I would like to address.

Based on what I've read in the newspapers and the web site, the total cost of the project seems to generate a lot of conflict, and I hear people saying that it's cost prohibitive versus the City
18:08:28 government's position that the costs are manageable.

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Honolulu, Hawaii (808) 524-2090

In any event, there's -- the amount of information is way too much, I think, for the normal citizen to process and digest. I would like to see a greater portion of the system be built at grade to bring the costs down and with the assumption that building it at
18:08:58 grade is going to be more cost effective.

A kind of contingent benefit, as I see it, to that using city or state roadways, particularly where four to six lanes exist in the same direction. So if you brought that down to two or three, you're
18:09:28 going to force more cars off of the road. Of course, this is a consensus issue as well as a fiscal one, but I hope there can be some kind of compromise.

The second thing is a little more important, and I --

(Buzzer sounds.)

HEARING OFFICER HAMAYASU: Please summarize.

MR. WONG: I'll send them in.

Thank you.

HEARING OFFICER HAMAYASU: That's the end of the registered speakers. Anyone else who would
18:10:00 like to provide comments on project issues?

Please step forward, state your name and address for the record.

Honolulu, Hawaii (808) 524-2090

MR. HOLMAN: My name is Russell Holman and I have a P. O. Box, 1201, Honolulu, Hawaii. I'm a transportation consultant. I'm sorry for not being prepared to have a written testimony, but I have a few concerns regarding the infrastructure needs since we
18:10:28 are at the Bishop Museum today I'm more concerned about the alignment going through Dillingham. As you look at it, I notice there's a lot of utility poles in the corridor, some of these KV lines and all that. But in the process I know there is a lot of median work to be done when you're doing the fixed guide rail construction. Somehow if they can put those utility lines and telephone lines underground like some of these places like east Honolulu, I think that can
18:10:59 beautify in terms of beautification of this neighborhood as well. Because when you're riding the bird's eye view in the fixed rail, you don't want to see all of these telephone lines, you know, with wires all the other stuff. And overall with the alignment if they can somehow get the utility lines as well and bring it underground, I think that might beautify the riders as well and the infrastructure needs.

Thank you.

HEARING OFFICER HAMAYASU: Anyone else
18:11:27 wish to testify? Do you want to check outside,

Honolulu, Hawaii (808) 524-2090

Patrick?

With nobody else interested in providing comments, I conclude this hearing at 6:12 p.m.

Thank you for your time and interest for the project.

(Hearing concluded at 6:12 p.m.)

STATE OF HAWAII)
COUNTY OF HONOLULU)

I, Nancy P. Blankenship, Certified Shorthand Reporter, in and for the State of Hawaii, certify that the foregoing proceedings were reported stenographically by me at the time and place indicated.

Given under my hand on this the 29th day of December, 2008.

Nancy P. Blankenship, CSR #459

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-332716

Mr. Arnold E. Widder
1888 Kalakaua Avenue, #1105
Honolulu, Hawaii 96815

Dear Mr. Widder:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

As shown in Table 3-14 of the Final EIS, the fixed guideway system will reduce vehicle hours of delay by 18 percent when compared to the No Build Alternative. In addition, Figure 3-11 in the Final EIS shows that the fixed guideway will substantially increase the transit share of total travel during the a.m. two-hour peak period. To determine the effects of the Project, street and highway system peak-period traffic volumes were evaluated at key screenline locations in the study corridor (a screenline is a virtual line drawn across the road network at selected locations to enable comparisons). As shown in Tables 3-9 and 3-10 in the Final EIS, traffic volumes will decrease by up to 11 percent at these screenlines during the a.m. and p.m. peak hours when compared to the No Build Alternative. Traffic reductions will result from people choosing to use transit during peak travel times.

Guidelines set forth by the NEPA of 1966, as amended and Chapter 343 of the Hawaii Revised Statutes stipulate that public involvement be carried out on large projects such as this one. As the largest infrastructure project ever to be constructed on Oahu, the City felt that it was important to disseminate information to as many people as possible. Thus, a broad range of print and visual media was necessary to reach different population segments.

Your preference for the Airport Alternative has been noted. While each of the alternatives discussed in the Draft EIS includes trade-offs between benefits and impacts, the Airport Alternative from East Kapolei to Ala Moana has been selected as the Preferred Alternative as described above. As compared to the alternatives discussed in the Draft EIS, the Airport Alternative will carry the most passengers, provide the greatest transit-user benefits, and result in the fewest vehicle hours of delay. It will provide access to employment centers at Pearl Harbor Naval Base and Honolulu International Airport and will serve the Salt Lake neighborhood with connecting bus service. Of the three Build Alternatives addressed in the Draft EIS, the Airport Alternative will have slightly less impacts to the natural and built environment analyzed in the Draft EIS. During the public comment period on the Draft EIS, the public overwhelmingly supported the Airport Alternative. Of the comments that specifically supported one of the alternatives, more than 75 percent were in support of the Airport Alternative. For more information this selection is discussed in Section 2.4 of the Final EIS. Since publication of the Draft EIS, design has been advanced, further analysis has been completed, and information has been added in response to comments on the Draft EIS and agency coordination. The Final EIS discusses the process that was used to select the Preferred Alternative, how comments were considered in the decision-making process, impacts and mitigation commitments.

The Project has logical termini at East Kapolei and Ala Moana Center and independent utility from any extensions that may be constructed in the future. The future extensions to West Kapolei, Salt Lake Boulevard, Waikiki, and UH Manoa are discussed in the cumulative impacts sections of Chapters 3 and 4 of the Final EIS; however the future extensions are not part of this Project, thus they are not required to be evaluated under Chapter 343 of the Hawaii Revised Statutes and NEPA. Under NEPA, environmental analysis is only required when there is a proposed action by a Federal agency. Here, because the future extensions are not proposed for implementation at this time, they are not part of the Project studied in the Final EIS. It would be premature to undertake an environmental analysis of the extensions (beyond the cumulative impacts analysis) because they are not part of the proposed action to be taken by the City and FTA. If the future extensions are proposed for implementation in the future, environmental analysis of the extensions and appropriate alternatives will be undertaken at that time. Other extensions, such as Central Oahu, have been considered and may be undertaken at some point after the current Project is constructed.

In the event that burials are encountered, they will be identified and managed in compliance with applicable laws. This will include consultation with project proponents, the Oahu Island Burial Council, the State Historic Preservation Division, and recognized lineal and/or cultural descendents to develop burial treatment plans. While this could slow down the project development process, applicable laws will be followed. As described in Section 4.18.11 of the Final EIS, the Programmatic Agreement will govern the treatment of burials discovered during construction.

As described in Section 6.3.2 of the Final EIS, most Federal funding for the capital costs of the Project is expected to come from the FTA Section 5309 New Starts Program. This is a discretionary program administered by the U.S. Department of Transportation for this specific purpose; these funds are not "taken away" from other Federal funding programs that would flow to the City and County of Honolulu.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

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MUFI HANNEMANN
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DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-332719

Mr. Robert Wong
4530 Waikui Street
Honolulu, Hawaii 96821

Dear Mr. Wong:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

The Alternatives Screening Memorandum (DTS 2006a) recognized the visually sensitive areas in Kakaako and Downtown Honolulu, including the Chinatown, Hawaii Capital, and Thomas Square/Academy of Arts Special Design Districts. To minimize impacts on historic resources, visual aesthetics, and surface traffic, the screening process considered more than 15 different combinations of tunnel, at-grade, or elevated alignments between Iwilei and Ward Avenue. As identified on pages 4-23 and 4-24 of the Screening Memorandum, four different alignments through Downtown Honolulu were advanced for further analysis, including an at-grade portion along Hotel Street, a tunnel under King Street, and elevated guideways along Nimitz Highway and Queen Street.

The *Alternatives Analysis Report (DTS 2006b) evaluated the alignment alternatives based on transportation and overall benefits, environmental and social impacts, and cost*

considerations. The report found that an at-grade alignment along Hotel Street would require the acquisition of more parcels and affect more burials than any of the other alternatives considered. The alignment with a tunnel under King Street through Downtown, in addition to the environmental effects such as impacts to cultural resources, reduction of street capacity, and property acquisition requirements of the at-grade section, would cost over $500 million more than the least expensive alternative.

The Project's purpose is "to provide high-capacity rapid transit" in the congested east-west travel corridor. The need for the Project includes improving corridor mobility and reliability. The at-grade alignment would not meet the Project's Purpose and Need because it could not satisfy the mobility and reliability objectives of the Project. Some of the technical considerations associated with an at-grade versus elevated alignment through Downtown Honolulu include the following:

- ***System Capacity, Speed, and Reliability**: The short, 200-foot blocks (or less) in Downtown Honolulu would permanently limit the system to two-car trains to prevent stopped trains from blocking vehicular traffic on cross-streets. Even with transit signal priority, the at-grade speeds would be slower and less reliable than an elevated guideway. Under ideal circumstances, the capacity of an at-grade system could reach 46,000 passengers per hour per direction, assuming optimistic 5 minute headways. Based on travel forecasts, the Project will need to carry approximately 8,000 passengers by 2030. Moreover, the system can be readily expanded to carry over 25,000 in each direction by reducing the interval between trains (headway) to 90 seconds during the peak period. To preserve a comparable system capacity, speed, and reliability, an at-grade alignment would require a fenced, segregated right-of-way that would eliminate all obstacles to the train's passage, such as vehicular, pedestrian, or bicycle crossings.*

- ***Mixed-Traffic Conflicts**: With the planned three-minute headways, the short cycle of traffic lights would affect traffic flow and capacity of cross-streets. Furthermore, there would be no option to increase the capacity of the system by reducing the headway to 90 seconds.*

- ***Construction Impacts**: An at-grade system would consume two or more lanes of existing roadway, resulting in increased congestion or requiring that additional businesses or homes be taken to widen the roadway through Downtown. This would also have greater construction impacts and potentially affect cultural practices and burials to a greater extent than the placement of discrete column foundations for an elevated structure.*

Because it is not feasible for an at-grade system through Downtown to move passengers rapidly and reliably without significant detrimental effects on other transportation system elements (e.g., the highway and pedestrian systems, safety, reliability, etc.), an at-grade system would have a negative systemwide impact that would reduce ridership throughout the system. The at-grade system would not meet the Project's Purpose and Need and therefore does not require additional analysis.

Project costs (both capital and operating) are described in Chapter 6 of the Final EIS and are subject to very close and continuing scrutiny by the Federal Transit Administration (FTA) and third party reviewers. To date, the FTA has accepted the financing structure for the Project and looks forward to more detail and clarity as the Project is refined in design.

The Alternatives Analysis examined potential configurations for the fixed guideway system. These configurations included possible surface operations on some portions of the alignment in Downtown. Reducing the number of lanes could encourage drivers to switch modes of transportation. However, the Build Alternatives addressed in the Draft and Final EISs involve exclusive operations on an elevated guideway. As stated above, these exclusive operations along the entire guideway provide more reliable service compared to a configuration with some surface operations. This configuration also reduces effects on traffic, parking capacity, and potential right-of-way needs, as discussed above.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

DEPARTMENT OF TRANSPORTATION SERVICES

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DEPUTY DIRECTOR

June 11, 2010

RT9/09-332726

Mr. Russell Holman
P.O. Box 1201
Honolulu, Hawaii
(Incomplete address provided)

Dear Mr. Holman:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

The Alternatives Analysis examined several alignments through the Kalihi area, including a route down King Street. The North King Street alignment was evaluated in the Alternatives Analysis. The North King Street alignment would have affected a greater number of parcels located within environmental justice/communities of concern areas (29 parcels of which 2 are residential versus 23 parcels of which none are residential along Dillingham Boulevard). In addition, a North King Street alignment would have moderate-high visual impacts whereas the Dillingham Boulevard alignment would have low-moderate visual impacts. The noise analysis conducted revealed moderate impacts at 52 receivers along the North King Street alignment whereas there would be moderate impacts at 17 receivers along Dillingham Boulevard.

There are 43 cultural practices and resources along the North King Street alignment that would be affected during construction and 2 that would be affected during operation. With the Dillingham Boulevard alignment, 23 cultural practices would be affected during construction and none that would be affected during operation (cultural practices varied from one-time annual events to cultural activities regularly held by churches or community organizations). The historic analysis identified pre-1965 tax map lots within the study corridor. Locations on this list included resources reviewed in previous studies and/or already included in the State Historic Preservation Division's State and National Register lists. The North King Street alignment is adjacent to 33 historic resources (of which 5 are on either the Hawaii Register or Eligible for the National Register) whereas the Dillingham Boulevard alignment is adjacent to 12 potentially historic resources (of which only 1 is on one of the registers). Accordingly, the alignment along Dillingham Boulevard was selected.

As discussed in Section 4.18.2 of the Final EIS, "Communication and coordination have been initiated with the affected utility agencies and companies and will continue throughout design and construction." Further, "Design criteria will govern all new utility construction outside of buildings, as well as the support, maintenance, relocation, and restoration of utilities encountered and affected by construction of the fixed guideway." In addition, "Along several roadway corridors, most existing overhead utilities in conflict with the guideway and safety clearance requirements will be relocated underground. Existing overhead electrical and communication utilities not in conflict with the aerial guideway and safety clearance requirements will remain overhead. Coordination will occur with emergency services and utility companies to ensure that utility relocations meet their needs and that sufficient clearance is provided. The City will evaluate relocation of utilities that are in conflict with the fixed guideway during preliminary design."

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure