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May 21, 2010 RT9/09-335154

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

Dear Mr. Genadio:

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

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

As stated in Section 2.2.3 of this Final EIS, the NEPA Notice of Intent requested input on five transit technologies. A technical review process included the opportunity for public comment and was used in parallel with the alternatives analysis to select a transit technology. The process included a broad request for information that was publicized to the transit industry. Transit vehicle manufacturers submitted 12 responses covering all of the technologies listed in the Notice of Intent. An independent five-member technology panel composed of four transit

experts and a transportation academic appointed by the City Council evaluated guided rubber-tire-on-concrete systems (e.g., Phileas bus system and VAL-type systems), monorail (which is a variation on rubber-tyred technology), steel-wheel-on-steel-rail systems, (e.g., light rail and rapid rail), and magnetic levitation (MAGLEV) . The panel considered the performance, cost, and reliability of the proposed technologies.

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

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

The City established steel wheel on steel rail as the technology for the Project based on input from the technology panel. Therefore, the analysis of the Project in the Final EIS is based on steel wheel on steel rail technology. Further, FTA's NEPA regulations for projects proposed to be funded with major capital investment funds, the level of detail necessarily increases between the Draft EIS and the Final EIS through preliminary engineering work (23 CFR 771 (j)). Chapter 6 of the Final EIS discusses the cost and funding sources for the Project.

The smaller structures proposed in the comment would result in shorter span-lengths, which would increase the number of columns required and the cost to construct both the additional foundations and columns. With no comparative data available to support an operating cost estimate, there are no means to verify this statement regarding maglev's operating and maintenance costs compared to steel wheel. Also, while intercity maglev can operate at very high speeds, urban maglev functions very much like a steel wheel rail system.

The single operating urban magnetic levitation system has a maximum speed of 100 kilometers per hour (62 miles per hour) which is similar to the maximum operating speeds of 50 to 60 miles per hour for steel wheel on steel rail systems. While the system is quieter, other systems may be designed to match the noise level of magnetic levitation when in operation. Steel wheel systems are capable of providing a smooth ride and reliable service.

The capital plan for the Project is presented in Section 6.3 of the Final EIS, which includes a description of the amount of funding anticipated from various sources. The capital plan takes the current economic downturn into account. Section 6.6 discusses the risks and uncertainties associated with the financial analysis prepared for the Project, including risks related to changes in project scope. If the Project is over budget, other sources of revenue have been identified in 6.3.3 and 6.6.3, which could include private funds (i.e., contributions toward the cost of building stations) or airport funds; however, approximately $1 billion in year-of-expenditure dollars is included in the project budget as contingency for just such eventualities.

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

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

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure