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May 21, 2010 RT2/09-299122R

Ms. Carol K. Lam, Senior Vice President
Servco Pacific Inc.
2850 Pukoloa Street, Suite 300
Honolulu, Hawaii 96819

Dear Ms. Lam:

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

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

General Comments

The comment about the impact of construction is acknowledged. As indicated in Sections 3.5.7 and 4.18.1 of the Final EIS, a Maintenance of Traffic (MOT) Plan will be developed by the contractor prior to construction and will address temporary effects on access to businesses during construction. Residents and businesses will be informed in advance of construction activities and the times and durations of such activities.

Contractors will be required to work with businesses to reduce the impact on their operations. Proposed mitigation to reduce adverse economic hardships for existing businesses along the project alignment during construction activities will include the following:

Comment [aq1]: This response does not specifically address the commenter's concern regarding noise and dust

- *Maintaining access to businesses during construction.*
- *Developing a public involvement plan prior to construction to inform business owners of the construction schedule and activities.*
- *Initiating public information campaigns to reassure people that businesses are open during construction and to encourage their continued patronage.*
- *Minimizing the extent and number of businesses, jobs, and access affected during construction.*
- *Coordinating the timing of temporary facility closures in cooperation with affected businesses to minimize impacts to business activities—especially those related to seasonal or high sales periods—to the extent practicable.*
- *Minimizing the duration of modified or lost access to businesses—as practicable.*
- *Providing signage, lighting, or other information to indicate that businesses are open.*
- *Providing public information (e.g., press releases or newsletters) regarding construction activities and ongoing business activities, including advertisements in print and on television and radio.*
- *Phasing construction in each area so as to maintain access to individual businesses for pedestrians, bicyclists, passenger vehicles, and trucks during business hours and important business seasons.*
- *Providing advance notice if utilities will be disrupted.*
- *Scheduling major utility shut-offs during non-business hours.*

Public information teams will be established for each construction segment consisting of individuals familiar with that project segment. Team members will work with local businesses to inform them of the Project's construction status and upcoming construction activities, as well as address concerns that local businesses may have. Team members will consider establishment of regularly scheduled meetings with individual businesses to provide these updates and address concerns of affected businesses.

A. Waipahu Property

1. Between Waipahu Depot Road and Mokuola Street, the guideway height would vary from 30 to 45 feet above the Farrington Highway median. Column spacing will be about 150 feet on average, allowing for substantial space between supports. As acknowledged in Section 4.8.3 of the Final EIS, "…the guideway… will obstruct some makai and mauka views across the highway…" However, because the alignment is in the roadway median, views of businesses from vehicles traveling on the highway will not be significantly affected and access will not be impaired.

2. As discussed earlier, an MOT Plan will identify measures to mitigate temporary construction-related effects on transportation. The contractor will develop the MOT Plan with approval from the City and the Hawaii Department of Transportation (HDOT). The MOT Plan will address roadway closures for streets identified in Table 3-27 of the Final EIS. The detailed schedule of activities will be part of the contractor's construction planning.

As stated in Section 4.18.1 of Chapter 4 of the Final EIS and discussed above, access to businesses will be maintained during construction and a public involvement plan will be developed prior to construction to inform business owners of the construction schedule and activities.

The schedule for the Farrington Highway widening project has not yet been established by HDOT. Construction coordination is underway between the City and the State as it relates to the Project and the planned widening of Farrington Highway. Schedules will be coordinated between the City and the State to minimize overall construction disturbance. The City has traffic consultants that have been part of the development of the maintenance of traffic plans. Furthermore, both the City and contractors will provide traffic engineering support who will continue to be part of the project through the construction phase.

The City will also coordinate construction of the Project with other construction projects in the area. A summary of project-related transportation effects, including temporary construction effects, is also included in Section 3.5.3 of Chapter 3 of the Final EIS. Effects could include lane closures and replaced or re-timed traffic signals. As discussed in 3.5.7, the construction contractors will develop a MOT Plan to address temporary construction-related effects on the transportation network.

3. As discussed in Section 4.14.3 of the Final EIS, the Project will not result in any long-term changes to groundwater levels.

Any ground stabilization methods used during construction will be performed in a manner that protects and maintains existing conditions. Induced settlement or movement of nearby facilities will not be permitted.

4. Section 4.18.2 of the Final EIS explains that construction effects on utilities will be temporary and limited. Businesses, including Servco Pacific, will be provided with advance notice if utilities are to be disrupted. Major utility shut-offs will be scheduled to occur during non-business hours to the extent feasible and will be coordinated with all local businesses.

5. Continued coordination and public outreach will keep business owners informed throughout the project process regarding right-of-way acquisition and project construction. The Project team (City and contractor) has a public information program and public involvement staff that will be in constant contact with the local community during construction. They will conduct meetings with groups and individual businesses, distribute newsletters about the Project status and progress, distribute flyers to notify businesses of anticipated construction activity, ~~make available~~establish a hot line ~~for~~to hear and address concerns as they develop, and sponsor a website to maintain the latest information available to any interested parties~~, etc~~.

B. South Street Property

1. As presented in Section 4.4.3 of the Final EIS: "where relocation will occur, compensation will be provided to property owners, businesses, or residents in compliance with all applicable Federal and State laws and will follow the Federal Uniform Relocation Assistance and Real Property Acquisition Policies Act (49 CFR 24). The City will assist all affected persons in locating suitable replacement housing and business sites within an individual's or business's financial means. The City will provide relocation advisory services to businesses where acquisition of adjacent property may substantially reduce clientele, limit accessibility, or affect a business in other substantial ways." DTS will coordinate with the property owner to review access and business activity constraints associated with right-of-way acquisition and construction impacts. If there are other considerations to the affected business such as an impact to service bays, those will also be part of the discussions between the City and the property owner. Final design will determine the ultimate impact and proper course of action related to each business.

As shown in Figure 2-35 of the Final EIS, the Civic Center Station will have entrances on both the mauka and makai sides of Halekauwila Street. The makai side of the street is currently a parking lot. This station design was used in all analysis conducted for the EIS. The impacts of both entrances are considered in the Final EIS. The two entrances are provided to improve access and safety at the Station. The City has substantially reduced the size of the property acquisition requirement on the mauka property in the latest design. The current requirement is for a land area of 20 feet by 200 feet and is not expected to impact existing buildings on the Servco property.

4. Construction is anticipated to be completed using drilled-shaft foundations. This method is discussed in Appendix ~~D~~ E to the Final EIS. It will not create substantial vibration levels as shown in the analysis of noise and vibration impacts of construction in Section 4.18.5 of the Final EIS. ~~Regarding equipment, while the drilling process does not typically~~The planned activities are not anticipated to create major vibration levels that

Comment [aq2]: This response is inadequate and too general. It does not specifically address the concerns stated in comments 1-3.

Comment [aq3]: Provide page references

Comment [KMC4]: There isn't really a specific section, but this layout was considered when analyzing ROW needed as well as other impacts.

Comment [aq5]: Include the above [KMC5] explanation in the response

would affect calibration; the City and contractor will work with Servco to ~~minimize~~address any effects.

5. As explained in Section 4.14.3 of the Final EIS, the Project will not result in any long-term changes to groundwater levels. Permanent Best Management Practices will be installed to direct runoff back into the ground to recharge the system.

As stated above regarding the Waipahu area, any ground stabilization method used will be performed in a manner that protects existing conditions. Induced settlement or movement of nearby facilities will not be permitted.

6. Due to the limited amount of parking available to residents and businesses in and around construction sites, construction workers will not be allowed to park their personal vehicles in the public right-of-way. Construction workers will not be allowed to use commercial parking facilities if doing so reduces available parking for customers or employees of that business. Approval is needed from the business owner before a private lot can be used for construction worker parking.

On-street parking by construction workers will not be permitted near a work site. During the actual hours of work, only those vehicles absolutely necessary for construction will be allowed within the safety zone or allowed to stop or park on the shoulder of the roadway.

Temporary lane closures are identified in Table 3-27 of the Final EIS. As previously discussed, the MOT Plan created by the construction contractor with approval from the City and/or HDOT, will identify treatment and management of construction-related effects on the local transportation system. The long-term effects on the transportation system (e.g., Halekauwila Street) are part of the traffic analysis discussed in Chapter 3 of the Final EIS.

Additional traffic studies are not anticipated as part of the MOT Plan. However, as stated in Section 3.5.6 of Chapter 3 of the Final EIS, access to businesses will be maintained during construction and a public involvement plan will be developed prior to construction to inform business owners of the construction schedule and activities.

Regarding the property acquisition comment, Servco Pacific will be contacted by the City regarding the acquisition of any property required for the Project. All potentially affected property owners have been notified by letter and will be contacted in person to discuss the acquisition process.

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 and will conclude the environmental review process for this Project.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure