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May 21, 2010 RT2/09-299126R

Ms. Betsy Lindsay
UltraSystems
16431 Scientific Way
Irvine, California 92618-4355

Dear Ms. Lindsay:

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

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

A. Transportation

Parking

- *The Pearl Highlands park-and-ride facility could be expanded upward with additional floors if more spaces are needed. This would be decided after the entire Project is in*

operation and if demand warrants the additional parking spaces at this facility. While there are 4,100 spaces identified as part of the Project, the experience with park-and-ride facilities in Honolulu to date is limited. They have been generally underused. The facilities contained in the Project are located toward the Ewa end of the route and are based on consideration of parking demand using the travel demand forecasting model for the year 2030. Further, the projected mode of access shares was compared to observed data from several Mainland areas, notably San Diego.

- *Given the history of park-and-ride use on the island, it seems prudent to evaluate any need for additional or larger facilities on the basis of empirical experience rather than commit substantial additional funding now. The Kapalama Station will have relatively low ridership when compared to the guideway system average (as shown in Figure 3-10 in the Draft EIS). This station is primarily a destination and, accordingly, more people will get off the train at this station during the a.m. two-hour peak period than board. The travel demand forecasting model has been refined since the Draft EIS was published to account for non-home-based direct-demand trips (trips that do not originate at home) during off-peak periods. In addition, the air passenger model (which forecasts travel in the corridor related to passengers arriving or departing at Honolulu International Airport) was updated to reflect current conditions. Figure 3-9 in the Final EIS presents the revised peak-period ridership numbers for each station. As noted in Chapter 2, Section 2.5.7 of the Final EIS, a park-and-ride facility will not be included at the Kapalama Station. As stated in this section, park-and-ride facilities will be constructed at stations with the highest demand for drive-to-transit access. ~~Aand a~~s shown in Table 3-22 in the Final EIS, the Kapalama station does not have high projected parking demand. Given the high quality service and passenger facilities provided at stations, the potential walk market is within one-half mile of the station as compared to the one-quarter mile noted in the comment. Most demand is expected to occur by walking, biking, or taking the bus to the station (as seen in Table 3-20 in the Final EIS). Less than 1 percent of mode of access to this station will require parking. As noted in Section 3.4.4 of the Final EIS, actual spillover parking at stations will be affected by several factors, such as availability of parking, changing conditions that will affect actual access to stations, and future development in station areas. As shown in Table 3-22 in the Final EIS, the projected demand for spillover parking at Kapalama Station is very low. Mitigation measures will be proposed at that time to alleviate the effects of spillover parking in station areas if it develops.*

- *Section 3.4.4 and Table 3-24 of the Final EIS identified potential effects of the Project on parking, including the 26 off-street parking spaces that will be lost on Dillingham Boulevard between McNeill Street and Waiakamilo Road. Section 3.4.7 of the Final EIS states that private, off-street parking spaces will be purchased for the Project as part of right-of-way needed along the length of the corridor in accordance with the requirements of the Federal Uniform Relocation Assistance and Real Property Acquisition Policies Act. All landowners will be paid fair-market value for the land, including the value of the parking spaces. Where landscaping, sidewalks, and driveway access will be affected by the Project, coordination will occur with the*

landowner, and these property features will be replaced and/or the property owner will be compensated in accordance with the Federal Uniform Relocation Assistance and Real Property Acquisition Policies Act. The City does not plan to generally replace all of the private, off-street parking purchased and removed for construction of the Project. However, with ~~and~~ the Project ~~will help reduce~~ the need for such parking demand is reduced. ~~However, the City will work with landowners to replace parking as needed on a case-by-case basis.~~

- *Section 3.4.4 and Table 3-24 of the Final EIS identified potential effects of the Project on parking, including the 10 off-street parking spaces that will be lost on Dillingham Boulevard between Waiakamilo Road and Kohou Street. Section 3.4.7 of the Final EIS states that private, off-street parking spaces will be purchased for the Project as part of right-of-way needed along the length of the corridor in accordance with the requirements of the Federal Uniform Relocation Assistance and Real Property Acquisition Policies Act. All landowners will be paid fair-market value for the land, including the value of the parking spaces. The City does not plan to generally replace all of the private, off-street parking purchased and removed for construction of the Project and the Project. As stated above, ~~will help reduce~~ the need for such parking will be reduced with the Project.*
- ~~*Please refer to the information provided in the above bullet.*~~

- *Table 3-24 of the Final EIS identifies effects of the Project on parking, including on-street spaces that will be lost on Halekauwila Street. Please note that the Project no longer plans to remove any parking between Keawe and Coral Streets. Section 3.4.7 of the Final EIS states that in locations where parking will be removed by the Project, other parking capacity generally exists nearby to accommodate demand. The cumulative and indirect effect of removing parking spaces to accommodate the Project will be that some people who parked in those spaces will either use another space nearby, will choose another mode to reach their destination, or will not make the trip.*

- *As stated previously, the experience with park-and-ride facilities in Honolulu to date is limited. They have been generally underused. Given the history of park-and-ride use on the island, it seems prudent to evaluate any need for additional or larger facilities on the basis of empirical experience rather than commit substantial additional funding now. Any need for additional parking at the four stations with park-and-ride facilities would best be determined once experience is gained about their use. Regarding the facilities that are identified, Chapter 6 of the Final EIS includes standard cost categories for the Project, including stations, stops, terminals, and ~~intermodals~~site work and special conditions. Cost estimates for park-and-ride facilities are included in the ~~intermodal~~ sitework and special conditions category shown in Table 6-1 in the Final EIS. Ongoing operating and maintenance costs include park-and-ride facilities at stations (see Section 6.4 of the Final EIS). Any funding needed for future park-and-ride extensions would be identified at the time those extensions ~~are~~is constructed.*

- *Your comments on additional mitigation measures for parking have been noted. The park-and-ride structures can be designed to accommodate upward expansion if needed. The Project will not acquire more property than ~~is identified to be~~what is needed. Given the history of park-and-ride usage, the purchase of additional land is not warranted until there is a verifiable need.*

Traffic Lane Width

- *While Table 3-21 ~~Although not reported~~ in the Draft EIS does not report the specific width of travel lanes under the No Build Alternative, the width of traffic lanes was considered as an information item in the level-of-service analysis. With regard to potential safety-related effects of reduced lane widths, a USDOT study found slightly higher accident rates associated with narrower travel lanes and shoulders[1]. However, all roadway widths will meet the standards of the American Association of State Highway and Transportation Officials (AASHTO), the Hawaii Department of Transportation (HDOT), and the City.*

- *Truck traffic volumes will be considered during Final Design when determining lane widths. As discussed in Section 3.4.3 of the Final EIS, ~~I~~in some cases, lane widths wider than indicated in Table 3-21 in the Final EIS may need to be provided, although 11-foot through lanes and 10-foot turn lanes are commonly used throughout the U.S. Under any circumstances, the proposed lane widths meet AASHTO and HDOT standards and will not be a hazard for larger trucks.*

- *As stated in Section 3.4.3, ~~D~~during Final Design the relationship of travel lanes, shoulders, sidewalks, and horizontal clearances to obstructions such as columns will be considered together in determining the final widths of each item. As noted earlier, some lane widths could increase from what is shown in Table 3-21 in the Final EIS. Permits for construction will not be approved unless a roadway facility that is safe and acceptable to the responsible transportation agency is provided. Sidewalks will meet Americans with Disabilities Act (ADA) requirements and provide a safe travel environment for users.*

Park-and-ride Effects

- *With the Project, deterioration of level-of-service (LOS) will occur near some station areas. Project mitigation measures are designed to reduce the negative impact to a level that meets or surpasses 2030 No Build conditions. For example, Table 3-23 in the Final EIS shows that the level-of-service at Kamehameha Highway and Kuala Street is projected to remain at LOS F under the No Build Alternative and the Project. With mitigation measures to be implemented with the Project, including street*

[1] U.S. Department of Transportation, December 2000, Prediction of the expected safety performance of rural two-lane highways.

widening and installation of signals, this intersection is projected to remain at LOS F during the p.m. peak hour and improve to LOS B during the a.m. peak hour. The average delay in seconds during the p.m. peak hour with this mitigation will be lower than that of the No Build Alternative. An impact is considered mitigated if the delay and level-of-service are improved or will be the same as the No Build Alternative. As shown in Table 3-23 in the Final EIS, the p.m. peak hour level-of-service at Farrington Highway (Ewa-bound) and Waiawa Street would decline from LOS D under the No Build Alternative to LOS F with the Project. At this location, mitigation measures include installation of signals, which will be synchronized with adjacent signals at Farrington Highway (Koko Head-bound) and Waiawa Street. With mitigation, this intersection is projected to operate at LOS B. The mitigation measures identified in Section 3.4.7 of the Final EIS and incorporated into the Project will fully mitigate the identified traffic impacts; therefore, additional mitigation measures will not be required.

- *As discussed in Section 3.4.3 and 3.4.7 of the Final EIS, mitigation measures for intersections near the Pearl Highlands station include ~~In addition to~~ widening Kamehameha Highway and modifying signal timings, and improved access to the H-2 Freeway ~~will be improved~~ near the Pearl Highlands Station. ~~Mitigation measures will include additional intersection widening and signalization, as discussed in Section 3.4.7 of the Final EIS.~~As shown in Table 3-23 of the Final EIS, these mitigation measures will improve the delay at the intersections around Pearl Highlands.*

- *As stated in Section 5.4.5 of the Honolulu High-Capacity Transit Corridor Project Transportation Technical Report (RTD 2008) and Addendum 02 to the Transportation Technical Report, new bus connection service will be provided to Central Oahu and North Shore communities as part of the design for the Pearl Highlands Station. Service will include feeder buses to Koa Ridge, Waiawa, and other enhanced limited-stop and peak-period express services serving Central Oahu and the North Shore. Appendix D in the Final EIS includes information on future bus routes and frequencies with the Project. These new feeder bus services are planned to provide alternative access to the guideway system. Additional mitigation measures are not needed because all project-related impacts will be fully mitigated by the measures outlined in the Final EIS and incorporated into the Project.*

B. Safety and Security

According to the FTA's Safety Management Information Statistics for 1997, the most recent data available in the Transportation Research Board's Report, Improving Transit Security, there was one serious offense for every one million passenger miles carried on rail. There is a need for security on transit systems, just as there is a need for police and other security in all aspects of modern society, but there is no evidence that crime rates associated with transit are any higher than for society in general and no indication that any particular issues will be created in the areas listed.

Stations will be patrolled by police, transit staff, and/or private security and will be closed at night when the system is not in operation (between midnight and 4:00 a.m.). Additionally, as stated in Section 2.5.4, of the Final EIS, security cameras that are monitored at all times of operation, audible and visual messaging systems, and an intercom link to the system operations center will also be included at all stations, park-and-ride facilities, and vehicles. The system will also include park-and-ride facilities with security and lighting. The City is working with the Honolulu Police Department to develop the system's safety and security program. As discussed in this section, security measures will include Crime Prevention through Environmental Design (CPTED) principles, which is a theory that proper design and effective use of the built and natural environments can reduce the fear and incidence of crime as well as improve the quality of life. CPTED measures ensures that spaces are visible, open, well-lit and observable to minimize crime and will be incorporated at all stations. The City will provide maintenance to the guideway and transit facilities.

As further stated in Section 2.5.4, a project-specific Safety and Security Management Plan has been developed in accordance with FTA requirements to define the safety and security activities and methods for identifying, evaluating, and resolving potential safety hazards and security vulnerabilities of these systems. It establishes responsibility and accountability for safety and security during the Preliminary Engineering, Final Design, construction, testing, and start-up phases of the Project. The Honolulu Police Department, the Honolulu Fire Department, the Department of Emergency Management, and the Honolulu Emergency Services Department have been involved in preparing and implementing the plan.~~Security will be provided in all stations and on all trains; however, security personnel may not be physically located in all locations at all times.~~

C. Land Use

Dillingham Boulevard

As stated in Section 4.4.3 of the Final EIS, "Where relocations (either full or partial) will occur, compensation will be provided to affected property owners, businesses, or residents in compliance with all applicable Federal and State laws and will follow the Federal Uniform Relocation Assistance and Real Property Acquisition Policies Act." DTS will work with land owners if nonconformities occur as a result of acquisitions. For instance, minimum requirements on existing or future uses (i.e., parking requirements or setbacks) could be reduced if nonconformities occur. DTS will work with the property owner to address these concerns.

As mentioned above, off-street parking on Dillingham Boulevard will be affected by the Project, as documented in Table 3-24 in the Final EIS. The City does not plan to generally replace private, off-street parking purchased and removed for construction of the Project. The City does not plan to generally replace all of the private, off-street parking purchased and removed for construction of the Project~~-~~. As mentioned above, ~~and~~ the Project will help reduce the need for such parking.

~~*However, the City will work with landowners to replace parking as needed on a case-by-case basis.*~~

Partial Acquisitions

Please see the response for the item above. In addition, Section 4.4~~.~~ of the Final EIS address both full and partial acquisitions.

Future Development

- *The planned and reasonably foreseeable actions~~-~~ in the study corridor are provided in Table 4-36, in Chapter 4 of the Draft EIS and as Table 4-39, Planned ~~Regions and Planned Land Use of this~~and Foreseeable Actions in the Study Corridor, in this Final EIS and in Figure 4~~.~~-2 of the Final EIS~~.~~. Table 4-29 in the Final EIS includes Kamehameha Schools redevelopment plans. The assessment of their impacts, both indirect and cumulative, is presented in Sections 4.18.2 and 4.18.3 of the Draft EIS and Section 4.19 of the Final EIS. The assessment of cumulative impacts followed Federal guidance, specifically the Council on Environmental Quality's Considering Cumulative Effects under NEPA.*

~~*The environmental impacts analysis of land development at each station will be performed during their individual development.*~~

- *As presented in Section 4.2.3 of the Final EIS, "Based on the relatively small number of parcels affected by full acquisition, the effects on different types of land uses in the study corridor ~~would~~ will be minimal. No mitigation measures would be needed." Project staff met with Kamehameha Schools on December 8, 2008 to discuss effects of the Project on all Kamehameha School owned properties, including those near the Kalihi and Kapalama stations. As a result of the December 8, 2008 meeting, a follow up presentation was held for Kamehameha Schools and their tenants on December 18, 2008. City staff has continued communication with Kamehameha Schools, Commercial Assets Division regarding right-of-way impacts and the EIS. Coordination between the City and Kamehameha Schools will continue. Any mitigation required as a result of Kamehameha Schools' redevelopment plans will be developed during their redevelopment-specific impact analysis that would be performed prior to redevelopment.*

- *Please see the previous response regarding ~~C~~coordination between the City and Kamehameha Schools regarding redevelopment plans at the Kapalama Station ~~has occurred and will continue~~. As stated previously, coordination will continue.*

- *The Project includes construction of an elevated fixed guideway from East Kapolei to Ala Moana Center. A station at Mo'ili'ili could be constructed as part of future extensions. Coordination with Kamehameha Schools would occur when planning for that station occurs.*

D. Visual/Aesthetics/Street Trees

- *The definition and description of viewer groups is provided in Section 3.1.4 of the Honolulu High-capacity Transit Corridor Project Visual and Aesthetic Resources Technical Report (RTD 2008). The following is an explanation of the terms "viewer exposure" and "sensitivity." Viewer exposure refers to the view groups' physical location, the relative number of people exposed to the view, and the duration of their view. This includes transit and highway users and people in the surrounding area. Viewer sensitivity refers to a group's expectations relative to a particular visual setting in a particular area. It is also the extent to which visual elements are important to the viewer group. Viewer sensitivity is affected by a variety of factors, including the activities a viewer in engaged in; the visual context; and their values, expectations, and interests. The assessment of visual effects in Section 4.8 of the Final EIS has considered that each viewer group, including business owners, customers, and employees, are important (see "Viewer Groups," in Section 4.8.2 of the Final EIS). The methodology for the visual assessment is detailed in Section 4.8.1 of the Final EIS. In addition, each viewer group's characteristics were considered in the assessment of visual effects for each of the viewpoints described in ~~the t~~Table~~s~~ ~~4.~~-9 in Section 4.8 of the Final EIS. The effects, which are noted as low, moderate, or significant, also consider each viewer group's location, duration, and distance. In response to the viewer groups' responses, received during the Draft EIS comment period, further analysis of views and vistas has been done and the visual effects of several key views have been reevaluated.**Comment [aq1]:** In what section of the text can this be found?

Your letter accurately summarizes the visual impacts of the Project on adjacent property owners. The Project has selected a landscape architect that has prepared landscape architecture design criteria. Included in the design criteria are four color palettes that correspond to the four major geographic areas along the project alignment: Plains, Pearl Harbor Basin, Salt Lake, and Coastal. The City will implement the following mitigation framework (see Section 4.8.3 Environmental Consequences, in this Final EIS [Visual and Aesthetic Conditions]) with the Project to minimize negative visual effects and enhance the visual and aesthetic opportunities that it creates:

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

- *Even with mitigation measures, some obstruction and changes to views will result in a high level of visual impact, or, a significant impact, and changes to some views will be unavoidable. These effects will be most noticeable where the guideway and stations are nearby or in the foreground of views.*

- *The City and County of Honolulu is conducting workshops with communities that will have rail stations. The purpose of the workshops is to engage the public about rail stations and provide opportunities to residents to contribute ideas about the appearance of station entryways in their areas. Ideas generated at the workshops will be incorporated into the station planning process. For more information and to get involved in this process, please visit the project website at www.honolulutransit.org.*

- *The Project is focused exclusively on the construction and implementation of rail transit service, which is analyzed in the Draft and Final EISs. However, as discussed in Section 4.19.2 of the Final EIS, transit-oriented development (TOD) is expected to occur in station areas as an indirect effect of the Project. The increased mobility and accessibility that the Project will provide will also increase the desirability and value of land near stations, thereby attracting new real estate investment nearby (in the form of TOD). Planning and zoning around station areas will be established and conducted by the City's Department of Planning and Permitting under a process covered by the City's new TOD Ordinance 09-4. The TOD special districts will encourage public input into the design of TOD neighborhood plans to reflect unique community identities. Information on the TOD process is available on DPP's website (http://honoluludpp.org/planning).*

- *The Design Pattern Guidebook is a design document, not an environmental analysis document, and is therefore not included in the Final EIS. It is available for review at the DTS office. The Guidebook ~~inculpates t~~reflects the sense of place in Hawaii. The ~~design~~guidebook ~~should be~~ is intended to create a design that is aesthetically appropriate as well as functional.*

- *DTS has developed specifications and design criteria to address the City's requirements for the Project. Guideway materials and surface textures will be selected in accordance with generally accepted architectural principles to achieve effective integration between the guideway and its surrounding environment. Landscaping and streetscape improvements will mitigate potential visual impacts.*

- *The station area planning process will include public design workshops for each station area, as stated above.*

- *As stated previously, DTS has developed specifications and design criteria to address the City's requirements for the Project. I~~Guideway materials and surface textures will be selected in accordance with generally accepted architectural principles to achieve effective integration between the guideway and its surrounding environment.~~*

~~Landscaping and streetscape improvements will mitigate potential visual impacts.~~ In addition, the ongoing station area planning process involves numerous aspects of transit system design. The planning process addresses design and planning issues in an integrated manner and focuses on the characteristics and preferences of the communities adjacent to each station.

- *As stated in Section 2.5.5 of the Final EIS, design criteria developed for stations place highest emphasis on walk and bicycle access. Pedestrian access to stations, including accessible routes, shall be given first priority for reasons of safety. The design criteria also state that, as a non-motorized mode, bicycles will be given second priority and will be placed over all motorized vehicular access to stations.*

- *The Project's landscape architect has prepared the landscape architecture design criteria. Included in the design criteria are four color palettes that correspond to the four major geographic areas along the project alignment: Plains, Pearl Harbor Basin, Salt Lake, and Coastal. Topography is included in the visual landscape.*

- *DTS has developed specifications and design criteria to address the City's requirements for the Project. Chapter 25 of the design criteria is dedicated to the safety and security of the system. Guideway materials and surface textures will be selected in accordance with generally accepted architectural principles to achieve effected integration between the guideway and its surrounding environment. Where the guideway columns fall within curbed areas, vines will be trained onto columns to reduce the ~~likelihood~~ possibility of graffiti and to soften the appearance of the structures.*

- *DTS has developed specifications and design criteria to address the City's requirements for the ~~Project.~~ Project. Specialty stations will be ~~treated~~ designed with respect to historic context and careful design to reinforce the uniqueness of context or use (e.g., the Kapalama Station might have a special planting of true kamani trees). The physical form of the project stations and support facilities will embody Honolulu and Hawai'i's rich cultural heritage. ~~Guideway materials and surface textures will be selected in accordance with generally accepted architectural principles to achieve effective integration between the guideway and its surrounding environment~~.*

- *The Project's landscape architect has prepared the landscape architecture design criteria. Included in the design criteria is the following goal regarding trees: "Transplant as many trees as possible displaced by the guideway to other areas of the Project that will be part of the first phase of construction or will otherwise not be disturbed by later construction." The design criteria also require the following: "Street tree planting or transplanting will occur adjacent to the station area and along the alignment where the existing streetscape is affected~~.~~. Trees should be placed every 50 feet where adjacent to residential areas and every 40 feet where adjacent to commercial areas. Tree species, sizes, and details must conform to City standards."*

Street tree pruning, removal and planting will comply with City ordinances and will require that a certified arborist manage the pruning of any Exceptional trees.

- *The Project's landscape architect has prepared the landscape architecture design criteria. The station design goals include the following regarding the reduction of light pollution:*

  1. Minimize light trespass from the building and site; reduce sky-glow to increase night sky access; improve nighttime visibility through glare reduction; and reduce development impacts on nocturnal environments.

  2. Only provide lighting for areas that is required for safety and comfort; all non-emergency interior lighting shall be automatically controlled to turn off during non-business hours; provide manual override capability for after-hours use.

- *The Project will include design features, including building materials and landscaping, that will allow the project to fit the topography and visual setting of the area. For instance, Section 4.8.3 of the Final EIS states that "Stations and park-and-ride facilities will be designed in a manner that is compatible with the surroundings."*

- *Criteria have been developed that will guide design of project elements. As indicated in Section 4.6.3 of the Final EIS, ongoing coordination efforts with the public will help develop design measures that will enhance the interface between the transit system and the surrounding community. The extent, nature, and location of these design measures will be determined through these coordination efforts.*

- *The~~se~~ measures listed in D-3 under the "construction-related mitigation" bullet of your letter are generally included in DTS's Standard Specifications for construction.*

- *The visual section of the Final EIS, Section 4.8, has been updated and expanded with additional view analysis since the Draft EIS. The island's unique visual character and scenic beauty were considered in the visual and aesthetic analysis presented in Section 4.8 of the Final EIS. It is acknowledged that the guideway and stations will noticeably contrast with smaller-sized buildings and change the character of some areas. In addition, some views Downtown and in other areas, including protected views, will be blocked, and some views will change substantially. Overall, the Project will be set in an urban context where visual change is expected and differences in scales of structures are typical. Noticeable changes to views will occur where project elements are near existing views or in the foreground of these views.*

Comment [aq2]: How will this be mitigated?

- *Street trees along the project alignment are discussed in Section 4.15 of the Final EIS. Effects to street trees will be mitigated by transplanting existing trees to areas as close to their original location as feasible or planting new ones. More detail on mitigation measures is discussed in Section 4.15.3 of the Final EIS. Specific sites for*

relocating trees will be considered during Final Design when plans for new plantings are prepared by a landscape architect.

- *In addition to transplanting existing trees, plans for new plantings will be prepared by a landscape architect during Final Design to further mitigate effects to street trees. To mitigate any substantial effects in areas that require tree removal, special attention will be given to developing landscaping plans so that new plantings will provide similar advantages to the community. If new plantings will not offer equitable mitigation (e.g., older mature trees that are removed), additional younger trees could be planted that will, in time, develop similar benefits.*

- *Trees that do not successfully transplant will be replaced by the contractor according to the terms of the construction contract documents. Monitoring requirements for successful restoration will be in the landscaping plan set; the responsibility is typically shared between the contractor and the owner.*

- *The details regarding specific trees planted in specific geographic areas are controlled by the landscape architecture design criteria. As indicated in Section 4.15 mitigation effects to street trees will be mitigated by transplanting existing trees to areas as close to their original location as feasible or planting new ones. Among the trees that require removal but could be transplanted are most of the trees along Farrington Highway. The location where street trees will be transplanted will be selected based on project specific criteria that could include the following:*
  - *Areas where existing landscaping will be lost along the study corridor*
  - *Areas where opportunities exist for enhancing existing streetscapes near the study corridor*
  - *Areas where stations and parking lots will be constructed*
  - *Areas where shared benefits will be accomplished, such as areas adjacent to parks or historic sites*

Street tree pruning, removal, and planting will comply with City ordinances and will require that a certified arborist manage the pruning of any Exceptional trees. Trees suitable for transplanting displaced by construction will be relocated to a City project nursery until they can be transplanted to another part of the project area. The City will coordinate with HDOT's highway landscape architect. In addition to transplanting existing trees, plans for new plantings will be prepared by a landscape architect during final design to further mitigate effects to street trees. To mitigate any substantial effects in areas that require tree removal, special attention will be given to developing landscaping plans so that new plantings will provide similar advantages to the community. If new plantings will not offer equitable mitigation (e.g., older mature trees that are removed), additional younger trees could be planted that will, in time, develop similar benefits.

E. Noise and Vibration

- *The noise analysis followed FTA guidance and is adequately documented in the Honolulu High-capacity Transit Corridor Project Noise and Vibration Technical Report (RTD 2008). The results of the predicted project noise exposure levels are presented in Appendix A of this technical report. The technical report is available at libraries, from DTS, and on the project website at www.honolulutransit.org.*

- *The methodology followed and the identification of sensitive noise receptors does not include commercial land uses as they are not noise-sensitive receptors. The FTA Noise Impact Criteria group noise-sensitive land uses into the following three categories:*

  Category 1: Buildings or parks where quiet is an essential element of their purpose.

  Category 2: Residences and buildings where people normally sleep. This includes residences, hospitals, and hotels where nighttime sensitivity is assumed to be of utmost importance.

  Category 3: Institutional land uses with primarily daytime and evening use. This category includes schools, libraries, theaters, and churches~~, and other commercial buildings~~ where quiet is important.

Impacts were evaluated to resources in these categories. Industrial and many commercial uses are not noise-sensitive. State of California guidelines are not applicable to projects in Hawaii.

- *As discussed in Section 4.9.1 of the Draft EIS, "Moderate noise impacts also require consideration and adoption of mitigation measures when it is reasonable." During Preliminary Engineering additional measures were evaluated. As stated in Section 4.10.3 of the Final EIS, with the recommended mitigation in place (sound absorbing material and wheel skirts), the noise analysis indicates that the new noise generated by the Project will be lower than the existing noise levels in most places. The use of these materials will mitigate ~~the~~ all anticipated~~predicted~~ noise impacts, including those at upper building floors.*

F. Construction Impacts

- *Regarding Concern #F-1, Aas discussed in Chapter 3, Section 3.5.7 of the Final EIS, a Maintenance of Traffic Plan (MOT) will identify measures to mitigate temporary construction-related effects on transportation. The contractor will develop the MOT Plan with approval from the City and the Hawaii Department of Transportation. The MOT Plan will address roadway closures for streets identified in Table 3-27 of the Final EIS, including those listed in your letter (specifically Farrington Highway between Makamaka Place and Waipahu Deport Road). An analysis of the impacts on local businesses is not anticipated as part of the MOT Plan. However, as stated in*

Section 4.18 of the Final EIS, access to businesses will be maintained during construction and a public involvement plan will be developed prior to construction to inform business owners and the public of the construction schedule and activities.

- *Regarding Concern #F-2, Tthe Final EIS includes commitments to maintain business access during construction. Requirements on the contractors to maintain access will be established through contract specifications. These measures will be considered during the development of the specifications.*

To address the additional mitigation measures requested:The mitigation measures proposed on pages 10-13 of your letter, unless specified otherwise below, will be utilized as part of the Project and contained within contract documents and special provisions.

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

- *DTS developed a community involvement plan for the Project that includes community-based staff that will work with neighborhood groups, residents, and businesses in each segment of the Project corridor. Representatives will visit businesses in each area to discuss the Project and take comments and answer questions. The MOT Plan and other construction-related plans will also be developed to minimize the impact construction will have on businesses.*

- *Every public involvement activity referenced in your letter will be undertaken during construction. An overall community involvement plan has been developed for the Project that details communications between the Project and the public. In addition, contractors hired for each construction segment will have a field office and will be required to meet with residents and businesses in the community and report to the DTS. The DTS and its contractor will jointly form a neighborhood-based plan of action to engage businesses throughout the process. The DTS sends monthly updates to the FTA regarding public involvement activities, which will continue throughout construction.*

- *The Final EIS includes commitments for community information during construction. The community information program will work with the individually affected communities. Some elements suggested for the Business Disruption Mitigation Plan, such as having a staff person work directly with the public and property owners to resolve construction-related problems, will be part of the MOT Plan or public information program. The DTS will work with all adjacent property owners and their tenants during construction to minimize disruption to local businesses.*

- *The Final EIS includes commitments to maintain business access during construction. Requirements on the contractors to maintain access will be established through contract specifications.*

- *Project construction does not entail cut and cover segments. As a result, the mitigation proposed in your letter for cut and cover activity is not applicable.*

- *As stated in Chapter 3, Section 3.5.5 of the Final EIS, access to existing bicycle and pedestrian facilities will be maintained during all phases of construction as safety allows. Warning and/or notification signs of modification to bicycle and pedestrian facilities during construction will be provided. Proposed pedestrian detours will be submitted to the City for review and approval to ensure they are reasonable for all pedestrians and meet ADA regulations. Sidewalk widths after construction is completed are shown in Table 3-25 of the Final EIS. All sidewalk widths will comply with minimum width requirements or better.*

- *Regarding Concern #F-3, the City has prepared a Construction Safety and Security Manual that requires the contractor to adhere to safe construction practices. Each contractor will be required to develop a Safety and Security Plan for areas within their responsibility. The Plan will be reviewed and accepted by the City. The Safety and Security Plan will include the costs associated with those security measures.*

- *Regarding Concern #F-4, ~~T~~traffic control during construction is the responsibility of the contractor. The contractor will follow the MOT Plan during construction. The MOT Plan is prepared through close coordination with the City and the Hawaii Department of Transportation. As stated in Section 4.18.2 of the Final EIS, construction in high-volume traffic and pedestrian areas could employ police support to direct and control traffic and pedestrian movements to lessen effects on mobility. Safety and Security plans have been developed in coordination with Honolulu Police Department and HPD has provided assurances that they have ~~The Honolulu Police Department has~~ sufficient staff to control and direct traffic ~~if~~ when needed. ~~and t~~This would be funded by the Project.*

- *Regarding Concern #F-5, ~~A~~as presented in Section 4.18.2 of the Final EIS, "Design criteria will govern all new utility construction outside of buildings, as well as the support, maintenance, relocation, and restoration of utilities encountered or affected by project construction." HDOT will be involved with utility coordination for utility work in state roadways and roadway rights-of-way. The design criteria for utilities are currently contained within Chapter 8 of the Design Criteria prepared as part of the contact documents. In addition, the General Conditions require coordination with property owners regarding, but not be limited to, underground utility service connections, access or driveway reconstruction, utility disruption, water service, grounding work, demolition, landscape protection, landscape restoration, fencing, mail delivery, and garbage collection. This includes notifying and working with adjacent property owners regarding non-state roadways and roadway rights-of-way.*

- *Regarding Concern #F-6, ~~Please see the response to the comment above. In addition, this includes overhead utilities that may conflict with construction of the guideway.~~ The City has been working with H~~ECO~~awaii Electric Company (HECO) sing~~from~~ the beginning of the ~~design and~~ planning and design work for this Project. All parts of the Project, including those on Dillingham Boulevard, will meet all clearance requirements for construction and maintenance of overhead cables. Given that construction will use overhead gantry systems for placement of the guideway, it will reduce the need for tall cranes. All ~~these~~construction systems will be properly insulated to ensure against any possible mishap.*

- *Regarding Concern #F-7, ~~F~~for the purposes of disclosure in the Final EIS, the air quality mitigation measures in Section 4.18.4 are sufficiently descriptive. As specified in this section, the Project must comply with the State of Hawaii's fugitive dust regulations, HAR 11-60.1-33, which provide more specific examples of mitigation measures. The contractor will select appropriate measures to comply with fugitive dust requirements. The following control measures can substantially reduce fugitive dust:*
  - *Minimize land disturbance*
  - *Use watering trucks to moisten disturbed soil*
  - *Use low emission equipment when feasible*
  - *Cover loads when hauling dirt*
  - *Cover soil stock piles if exposed for long periods of time*
  - *Use windbreaks to prevent accidental dust pollution*
  - *Limit the number of vehicular paths and stabilize temporary roads*

- *Regarding Concern #F-8, ~~T~~there will be temporary noise and vibration impacts during construction, as presented in Section 4.18.5 of the Final EIS. For the purposes of disclosure in the Final EIS, the noise and vibration mitigation measures presented in Section 4.18.5 are sufficiently descriptive. As stated in this section, the Project must obtain from the Hawaii Department of Health an approved community noise variance. The detailed mitigation commitments will be included in the community noise variance application and may include the measures proposed in the comment. The Hawaii Department of Health includes public involvement in establishing variance requirements.*

G. Indirect and Cumulative Effects

- *As noted in Section 3.4.4 of the Final EIS, station areas with the highest estimated demands for spillover parking were at West Loch, Pearlridge, Iwilei, and Ala Moana Center. Table 3-22 in the Final EIS shows projected spillover parking demand near each guideway station. The Final EIS also notes that actual spillover parking at guideway stations will be influenced by several factors, such as availability of parking, changing conditions that will affect actual access to stations, and future development in station areas. As also noted in Section 3.4.2 of the Final EIS, ridership information*

for the Project is based on demand projections for 2030. The sizing of the system, including park-and-ride facilities, is based on this estimated long-term demand. When the Project is implemented, access to stations will be monitored. If park-and-ride access is higher than estimated, overall access will be reviewed, including approaches to increasing shares of other modes, such as local transit.

H. Section 4(f) Analysis

- *One parking space will be lost on the Boulevard Saimin parcel as a result of the Project. Kamehameha Schools will be compensated for this space in accordance with the Federal Uniform Relocation Assistance and Real Property Acquisition Policies Act.*

I. Mitigation Measures

- *All mitigation commitments will be in the Final EIS, the Record of Decision, and permits (as appropriate), and will be incorporated into the Project's Final Design.*
- *DTS and the construction contractor will prepare a schedule for implementation of the environmental commitments. DTS's Environmental Compliance Manager will ensure that the environmental commitments are adhered to during construction.*
- *Mitigation measures required during construction of the Project will be ~~taken directly from~~ included in the Record of Decision ~~will be located in a stand alone document~~ and included as requirements ~~for~~in the appropriate construction contract documents.*
- *As the City must approve the contractors' work, the City will ensure that contractors comply with all construction and mitigation requirements.*

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. 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