DEPARTMENT OF TRANSPORTATION SERVICES

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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:

In parallel with the alignment analysis, an independent five-member panel comprised of transit experts and a transportation academic appointed by the City Council and the Mayor considered the performance, cost, and reliability of the five proposed technologies for the fixed guideway system. The panel twice accepted public comment as part of the review. By a four-to-one vote, the panel selected steel wheel operating on steel rail as the technology for the Project evaluated

in the Final EIS. The four panel members selected steel-wheel technology because it isproven, safe, reliable, economical, and non-proprietary. 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, including magnetic levitation, offered substantial proven performance, cost, and reliability benefits compared to steel wheel operating on steel rail. Selecting a proprietary technology also would have precluded a competitive bidding process, likely resulting in increased overall project costs.

~~Your comments regarding technology have been noted. In parallel with the alignment analysis, a five-member panel appointed by the City Council and the Mayor considered the performance, cost, and reliability of the five proposed technologies for the fixed guideway system. The panel twice accepted public comment as part of the review. By a four-to-one vote, the panel selected steel wheel operating on steel rail as the technology for the Project evaluated in the Final EIS. The four panel members selected steel wheel technology because it is mature, proven, safe, reliable, economical, and non-proprietary. 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. Selecting a proprietary technology also would have precluded a competitive bidding process, likely resulting in increased overall project costs.~~ 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))

The smaller structures proposed in the comment would result in shorter span-lengths, which would increase~~s~~ 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.

23 CFR 771.111(f) states "The action evaluated in each EIS…shall not restrict consideration of alternatives for any other reasonable forseeable 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,

Comment [k1]: Refer to FEIS Chapter 6 in response to commenter's concerns about project costs/budgets/ and timelines.

Comment [k2]: State that a noise analysis was conducted, identify the impact levels, and the mitigation commitments. Indicate that impacts from guideways on homes and businesses will be mitigated (noise/aesthetics/landuse). Also, include a summary of public involvement opportunities and reference FTA reg 23 CFR 771.111(i).

Comment [k3]: Add why this technology was chosen.

WAYNE Y. YOSHIOKA
Director

Enclosure