DEPARTMENT OF TRANSPORTATION SERVICES

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May 21, 2010 RT10/09-336959

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 paragraphs address comments regarding the above-referenced submittal:

In parallel with the alignment analysis, an independent five-member panel 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 is 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, 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.

There is one operating urban magnetic levitation system in the world, and it has less than five years of operating record. The single operating 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 common for steel wheel systems. While the system is quieter, other systems may be designed to match the noise level of magnetic levitation when in operation. There are no specific safety improvements from the traction design. The assumed visual benefits for beam-track vehicles would not apply in the U.S. because of requirements to include an emergency egress walkway. In addition, the smaller structures proposed in the comment result in shorter span lengths, which increases the number of columns required and the percentage of views blocked by the support structure, which would result in higher costs.

In addition, the magnetic levitation system would not provide a net benefit or proven cost savings. To date, the High Speed Surface Transport system operators have declined to make operating expenses available. No comparative maglev project has ever been built within the U.S. Therefore, no data are available to support a cost estimate. ~~Some of the savings recognized in other countries for beam-track vehicles would not apply in the U.S. because of requirements to include an emergency egress walkway. Also, the smaller structures proposed in the comment result in shorter span length, which increases the number of columns required and thus 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 a steel wheel system. The demonstrated operating speed of 100 kilometers per hour for urban magnetic levitation is similar to that of steel wheel systems.

~~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 this 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.~~

~~There is a single operating urban magnetic levitation system in the world, in Japan, and having opened for operation in 2004, has only five years of operating record. The technology is unproven. The single operating 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 common for steel wheel systems. While the system is quieter, other systems may be designed to match the noise level of magnetic levitation when in operation. There is no specific safety improvement from the traction design. The assumed visual benefits for beam-track vehicles would not apply in the U.S. because of requirements to include an emergency egress walkway. Also, the smaller structures proposed in the comment result in shorter span lengths, which increases the number of columns required and the percentage of view blocked by support structure, which would result in higher costs.~~

Comment [k1]: Comprised of who? Subject matter experts? This does not address the commentor's claims of panel bias.

Comment [k2]: Clearly explain why laglev is not appropriate/suitable for Hawaii.

Comment [k3]: Based on what standard/definition of "proven"?

Comment [k4]: Refer to FEIS Chapter 6 in response to commenter's concerns about project costs/budgets/ and timelines.

~~In addition, a magnetic levitation system would not provide a net benefit or proven cost savings and would not change the selection of the preferred alternative. To date, the High Speed Transit System (HSST) system operators have declined to make operating expenses available. No comparative maglev project has been built within the U.S. Therefore, no data are available to support a cost estimate. Some of the savings recognized in other countries for beam-track vehicles would not apply in the U.S. because of requirements to include an emergency egress walkway. Also, the smaller structures proposed in the comment result in shorter span-lengths, which increases 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.~~

Magnetic levitation requires a different guideway design that would have different impacts from a steel-wheel system, as presented in the previous responses above. The guideway design is being completed only for the technology that will be used for the Project.

~~Magnetic levitation requires a different guideway design that would have different impacts from a steel-wheel system, as presented in responses above. The guideway design is being completed only for the technology that will be used for the Project.~~

Section 2.2.2 of the Draft EIS discusses the four alternatives evaluated as part of the Draft EIS and included a No Build Alternative and 3 Build Alternatives (Salt Lake Alternative, Airport Alternative, and the Airport and Salt Lake Alternative). Your preference for the Airport Alternative has been noted. While each of the alternatives includes trade-offs between benefits and impacts, the Airport Alternative from East Kapolei to Ala Moana Center has been selected as the Preferred Alternative.

The identification of the Airport Alternative as the Preferred Alternative was made by the City to comply with the FTA's NEPA regulations that state the Final EIS should identify the Preferred Alternative (23 CFR § 771.125 (a)(1)) and need not evaluate alternatives rejected for good cause. This selection was based on consideration of the benefits of each alternative, public input on the Draft EIS, and City Council Resolution 08-261 identifying the Airport Alternative as the Project. 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 identification of the Airport Alternative as the Preferred Alternative was made by the City to comply with FTA's NEPA regulations that state that the Final EIS should focus on the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative, public input on the Draft EIS, and City Council Resolution 08-261 identifying the Airport Alternative as the Project. 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 selection of the Airport Alternative as the Project is described in Chapter 2 of this Final EIS. The discussion of the alternatives considered is included in Chapter 2 of this Final EIS and the Alternatives Analysis. As discussed in Section 3.4.2 of this Final EIS, the Airport

Comment [k5]: State why Figure 2.9 of DEIS (Figure 2.12 of FEIS) was not deleted.

Comment [k6]: This does not address speed comments.

Comment [k7]: Please address comments on speed of maglev versus Project. Also, 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 [k8]: Also include expected reliability and performance for Project.

Comment [k9]: This doesn't respond to commenter's claims that maglev is safer because of wrap around the beam configurations. State that safety concerns will be addressed in SSMP.

Comment [k10]: FTA's NEPA regulations only require that the preferred alternative be identified in the FEIS, not that it be the focus of the FEIS.

Comment [k11]: This is not what the regs say!!!! Must be changed. See above comment.

Comment [k12]: Provide a brief summary of these benefits (why it was chosen as opposed to other alts/technologies).

Comment [k13]: This is not what the regs say!!!! Must be changed. See above comment.

Comment [k14]: Provide a brief summary of these benefits (why it was chosen as opposed to other alts/technologies).

Alternative will carry the most passengers with 116,000 daily passengers and 282,500 daily trips in 2030, thereby resulting in the greatest transit-user benefits. Compared to the other alternatives considered, Tthe Airport Alternative will also result in the fewest vehicle miles traveled and vehicle hours of delay, as well as provide access to major employment areas including Honolulu International Airport, that will have substantially greater ridership than the other alternatives considered. ~~In addition, the Airport Alternative will have fewer parcel acquisitions than the Salt Lake Alternative.~~

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.

~~Only the technology that will be used for the Project is addressed in the Final EIS.~~

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

Comment [k15]: Are these all compared to all other alternatives? Clearly explain this.

Comment [k16]: Indicate that all alternatives/technologies were considered if this was the case.