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May 21, 2010 RT2/09-299096R

Mr. Jim Brewer
P.O. Box 23403
Honolulu, Hawaii 96823-3403

Dear Mr. Brewer:

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:

As discussed in Chapter 2 of the Final EIS, additional alternatives, including other technologies, including Mag-lev and the Phileas system, were evaluated during the Alternative Analysis phase of the Project. The Alternatives Analysis phase evaluated a range of transit mode and general alignment alternatives in terms of their costs, benefits, and impacts relative to their ability to meet the purpose and need for the project.

Comment [TH1]: Discuss how the alternatives developed from the P&N.

First, beginning in the fall of 2005, a~~A~~n initial screening process considered alternatives identified through previous transit studies, a field review of the study corridor, an analysis of current

population and employment data for the study corridor, a literature review of technology modes, ongoing work completed ~~for~~ as part of the Oahu Regional Transportation Plan 2030 (ORTP) prepared by the Oahu Metropolitan Planning Organization (OahuMPO) (OahuMPO 2007), and public and agency comments received during the formal Alternatives Analysis scoping process.

~~During the fall of 2005 and winter of 2006, the City and County of Honolulu (City) completed the alternatives~~This screening process ~~that i~~is documented in the Honolulu High-Capacity Transit Corridor Project Alternatives Screening Memorandum (DTS 2006a). Three s~~S~~coping meetings were held during the screening process in December 2005, which included a presentation of initial alternatives to the public, interested agencies, and officials to receive comments on the Purpose and Need, alternatives, and scope of the Alternatives Analysis. Refinements were made to the alternatives based on the public input during scoping. ~~In total, 75 fixed guideway alignment options were screened.~~

After completion of screening in the winter of 2006, ~~T~~the following alternatives were studied in the Alternatives Analysis: No Build Alternative, Transportation System Management (TSM) Alternative, Managed Lane Alternative, and the Fixed Guideway Alternative. After review of the Alternatives Analysis Report and consideration of public comments, the City Council selected a fixed guideway transit system extending from Kapolei to UH Manoa with a connection to Waikiki as the Locally Preferred Alternative. The selection, which eliminated the TSM and Managed Lane Alternatives, became Ordinance 07-001 on January 6, 2007. The fixed guideway system is the most cost-effective of all the alternatives studied. Less expensive options would not have improved system performance. The NEPA process considered a range of alternatives that were consistent with the identified Locally Preferred Alternative. The minimum operable segment or the "Project" was defined based on available funding and logical termini for the preparation of the EIS.

As stated in Section 2.2.3 in the Final EIS, the NEPA Notice of Intent published in March 2007 requested input on five transit technologies. A technical review process ~~that~~ which occurred during development of the Draft EIS ~~and~~ included the opportunity for public comment and was used in parallel with the alignment analysis to select a transit technology. The process included a broad request for information ~~that was publicized to~~from the transit industry. Transit vehicle manufacturers submitted 12 responses covering all of the technologies listed in the Notice of Intent. Rubber tire on concrete systems, such as the Phileas system, were evaluated during February 2008 by a five-member panel appointed by the City Council that considered the performance, cost, and reliability of the proposed technologies. The panel accepted public comment twice as part of its review. By a four-to-one vote, the panel chose a steel wheel operating on steel rail system. 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, such as Mag-Lev and the Phileas system, 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 panel's findings were summarized in a report to the City Council dated February 22, 2008.

Comment [TH2]: This entire paragraph needs to follow a logical timeline and lists the steps in chronological order, starting with the date (month/year) the screening process began. It also needs to discuss if public meetings were held, how public comments were evaluated, and how alternatives were eliminated from further consideration, etc.

Comment [TH3]: Were the scoping meetings held as part of the screening process or independently? How many were held and when (specific date)?

Comment [TH4]: Refinements were made based on what? Public comment? Please clarify.

Comment [TH5]: Did the refinements add to the total alignment options screened ie., did you start with less than 75 options and through the refinement process, end up with 75? Or did you have 75 options from the beginning? It's unclear as written.

Comment [H6R5]: Reference to 75 has been removed

Comment [TH7]: How do these alternatives fit in with the 75 options? Please clarify.

Mention the TSM alternative is a required of the New Starts process and cite the regulation.

Comment [TH8]: Explain how the LPA was carried forward into the NEPA process.

Comment [TH9]: When was the NOI published in the Federal Register? List date.

Comment [TH10]: Was the technical review process separate from the AA and screening processed? Please clarify.

Comment [TH11]: How? Through public hearings/ newspaper advertisements?

Comment [H12R11]: Why is this necessary? Seems irrelevant to the substance of the response.

Comment [TH13]: When? List date.

Chapter 8 of the Final EIS details the Project's public involvement activities, including scoping and Public Hearing dates. The public was afforded opportunities to comment on the project during one of the two public scoping meetings in December 2005 for the Alternatives Analysis and one of the three public scoping meetings for the preliminary engineering/EIS phase of the Project in March and April 2007. The Project also conducted five Public Hearings in December 2008 during the Draft EIS comment period in which the public was encouraged to provide comment on the Project. The Project conducted numerous Community Information Meetings, manned booths at public events, conducted Speakers Bureau presentations, and maintained a website and hotline to solicit public comment ~~throughout the planning process~~beginning in 2005 and extending through publication of the Final EIS. A list of these activities can be found in ~~a~~Appendix G of ~~this~~ the ~~document~~Final EIS. The Project created the public involvement program according to FTA guidelines as required by SAFTEA-LU Section 6002. ~~The FTA has also been apprised of the project's public involvement activities periodically and has found our program to be acceptable.~~

Regarding the November 2008 election results, the environmental review of the Project is independent of the electoral process or results. As mentioned earlier, ~~this~~NEPA review for this project began with the Notice of Intent published in the Federal Register on ~~(list specific date)~~March 15, 2007.

The request for further evaluation of additional technology has been noted. However, no new information has been provided that would support re-evaluation of the technology.

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 [TH14]: Was this after the publication of the DEIS? Please specify.

Comment [TH15]: List the range of dates.

How were public comments captured? By mail, email, etc.? Please specify.