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Mr. Mike Uechi
98-111 Kaahele Place
Aiea, Hawaii 96701

Dear Mr. Uechi:

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:

Comments on Chapter 2 of the Draft EIS

Technology related to transportation continues to evolve. Improvements to all modes, including transit and single-occupant vehicles, will make those modes safer and more efficient. The changes mentioned in the comment may make the internal combustion engine used in automobiles today obsolete; however, they would enhance the attractiveness of an electrically-powered rail system, which already consumes less energy per passenger-mile carried than

automobiles, as is illustrated by the reduced energy demand shown in Section 4.11 of the Final EIS. Furthermore, none of the technologies mentioned in the comment letter are available for broad application at this time. They are all experimental or in demonstration modes.
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.

Comments on Chapter 4 of the Draft EIS

Regarding construction delays, the City is working closely with the Oahu Island Burial Council and other stakeholders to develop the most effective ways to find, identify, protect, or relocate any affected iwi kupuna (Hawaiian burials) well in advance of Project construction.

The Project is a Fixed Guideway Transit system. The system will use steel-wheel-on-steel-rail technology. Current versions of this technology are quieter than a bus at the same distance. Noise effects from the Project are detailed in Section 4.10 of the Final EIS. The Project will cause no severe noise impacts. Moderate impacts will occur at upper floors of a few high-rise buildings (as shown in Table 4-18 in 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 project design includes an integrated noise-blocking parapet wall at the edge of the guideway structure that extends three feet above the top of the rail. The parapet wall will substantially reduce ground-level noise.

Wheel skirts will increase the benefit from the parapet wall at locations above the elevation of the track. The use of sound-absorptive materials below the tracks in the areas that will experience moderate noise impacts will reduce the Project noise levels from the upper floors to below the impact level. Once the Project is operating, noise levels will be re-measured to confirm that there are no noise impacts from the Project.

The island's unique visual character and scenic beauty was considered in the visual and aesthetic analysis presented in the Draft and Final EISs. As discussed in Section 4.8 of the Final EIS, the Project will be set in an urban context where visual change is expected and differences in scales of structures are typical. The following measures will be included 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 transit-oriented development program within the Department of Planning and Permitting.*

- *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.*

It should also be noted that the Project will provide users, including tourists, with expansive views from several portions of the corridor by elevating riders above highway traffic, street trees, and low structures adjacent to the alignment. In Section 4.8.3 of the Final EIS under the heading Design Principals and Mitigation, specific environmental, architecture and landscape design criteria are listed that will help minimize visual effects of the Project.

The fact that this will be the only island with high-capacity transit, with an efficient airport connector, may in fact attract more tourists who value the convenience, potential cost savings, and decreased travel time between various tourist destination spots along the Project's alignment.

Rail, as a technology, predates the automobile by a few years. It is a well-established technology with a long track-record of good performance and continued technological development. The rail options considered for Honolulu are modern, quiet systems that are more fuel efficient per passenger than the automobile and which can easily carry large volumes of people. Ridership forecasts are over 116,000 per day in 2030 as noted in Chapter 3 of the Final EIS, and stations will accommodate an attendant to help prevent the types of vandalism and nuisances described in your comment.

Table 3-14 of the Final EIS shows that implementation of the fixed guideway alternative is forecast to result in an 18-percent decrease in traffic delay and congestion compared to the No Build Alternative or the other alternatives that do not include a fixed guideway system. The local and federal funds anticipated to be used for constructing the Project are available only for the specific purpose of building a fixed guideway system. They cannot be used for sewer, solid waste, or highway projects. Chapter 6 of the Final EIS contains a detailed discussion of the financial analysis prepared for the Project and the availability of the proposed funding sources for the Project.

Comments on Chapter 8 of the Draft EIS

The overall public information program has been continuous since the beginning of the Project in 2005. The Alternatives Analysis phase evaluated a range of transit mode and general

alignment alternatives in terms of their costs, benefits, and impacts. During the fall of 2005 and winter of 2006, the City and County of Honolulu completed the alternatives screening process that is documented in the Honolulu High-Capacity Transit Corridor Project Alternatives Screening Memorandum. Scoping meetings were held, which included a presentation of alternatives to the public and interested agencies and officials to receive comments on the Purpose and Need, alternatives, and scope of the analysis for the Alternatives Analysis. Refinements were made to alternatives. In total, 75 fixed guideway alignment options were screened.

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.

Guidelines set forth by NEPA, as amended, and Chapter 343 of the Hawaii Revised Statutes stipulate that public involvement be carried out on large-scale projects such as the rail project. As a large infrastructure project, the City felt it was important to disseminate information to as many people as possible. Thus, a broad range of print and visual media and community outreach were necessary to reach different population segments. Project funds were used for the public involvement activities listed in Chapter 8 of the Final EIS as required by NEPA. In addition, all testimony and comments received during the public hearings will be answered and a written or electronic letter will be sent when the Final EIS is issued. Questions and comments have been taken and addressed from all members of the public. Information presented about the Project in public presentations has been reviewed to ensure that information presented is accurate. All individuals have been provided equal opportunity to express their opinions within an established time limit. Dates and times for meetings and discussions held under the public involvement process are presented in Chapter 8 of 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