OFFICE OF THE MAYOR
CITY AND COUNTY OF HONOLULU
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MUFI HANNEMANN
MAYOR

April 5, 2010

The Honorable Peter M. Rogoff
Administrator
Federal Transit Administration
U. S. Department of Transportation
1200 New Jersey Avenue, SE
Washington, D. C. 20590

Dear Mr. Rogoff:

Subject: Honolulu Rail Project Avoidance of Honolulu International Airport (HNL) Runway Protection Zone

Over the past ~~six~~several months, the City and County of Honolulu (City) has been in discussions with the Federal Transit Administration (FTA), Federal Aviation Administration (FAA), and Hawaii Department of Transportation – Airports Division (HDOT) over the best way to address the short segment of the rail guideway that crosses the extended runway protection zone (RPZ) for Runway 4R/22L at Honolulu International Airport ("HNL"). These discussions became necessary as a result of FAA regulation changes affecting HNL. ~~that have not yet been reflected on the HNL Airport Layout Plan upon which the Airport alignment was defined during the Alternatives Analysis and scoping for the Draft Environmental Impact Statement (EIS).~~

The discussions among all the agencies have yielded a vast amount of information regarding the need to mitigate the transit project's impact on HNL's ability to manage air traffic and enhance the protection of people and property on the ground. While the City's proposed mitigation of those effects along the rail route alignment shown in the Draft Environmental Impact Statement ~~DEIS~~ has never been determined to be infeasible, the FAA has recently generated a ~~long~~ list of ~~mitigation~~on-airport measures necessary to accommodate the RPZ extension under the current alignment.~~that were presented to the City just three weeks ago.~~ This list carries significant additional costs that effectively render the current alignment through the runway protection zone infeasible.

As I indicated to you previously as the FAA information was being developed, and as we have discussed on the phone over the past two weeks since the FAA information was presented to the City, the significant cost associated with the recently developed FAA mitigation measures leaves us no choice but to shift the alignment at the point where the guideway impinges on the HNL runway protection zone. Therefore, I am hereby confirming to ~~notifying~~ the FTA that the City proposes a shift in the ~~Administrative copy of the Final EIS will be revised to reflect an~~ alignment that will avoid ~~mitigate~~ any encroachment into the central portion of the RPZ of Runway 22L/4R. The alignment through the Airport area will still be primarily on Aolele Street and the avoidance will commence approximately 2,000 feet west of Lagoon Drive. ~~Mitigation of the concerns identified during Preliminary Engineering and preparation of NEPA documents is consistent with actions being taken in other portions of the corridor. Once complete, we will forward the FEIS that will fully disclose the effects resulting from the mitigation.~~ Supporting data have already been forwarded to FTA's environmental analysts. We eagerly await a determination regarding the appropriate process for introducing the proposed avoidance alternative into the record.

Thank you for your ongoing assistance on this critical project for the citizens of Honolulu. Please call me at 808-768-4141 if you have any questions about our chosen course of action.

Sincerely,

Mufi Hannemann
Mayor