1. FTA would like to see more information on the anticipated impacts from the proposed alternative alignment. For example, under environmental justice, rather than say there are no identified EJ areas or communities of concern, we would like to see what information was used to make that determination. This information could be somewhere in the technical reports or draft environmental impact statement. If so, reference back to specific pages and methods in these reports. Please do this with each resource area topic.

Placeholder for 1.

2. Describe how, in developing the avoidance alternative, efforts were made to minimize impacts on property acquisitions, privately owned businesses, historic properties, and Keehi Lagoon Beach Park. We also note that the DEIS did not document the 4(f) effects at Keehi Lagoon Park as de minimis. FTA has yet to make a section 4(f) finding and we will need additional information to assist us in our finding.

Placeholder for 2.

3. For historic resources, the City provided new information on properties along Ualena Street that were not previously included in the project's Area of Potential Effect. However, there is no discussion or information provided about the properties that would now be demolished as part of the proposed alternative alignment. Again, this information may be in the technical reports and draft environmental document. Direct FTA to specific reports and page numbers to support the statement that there would be no historic properties affected. This information will eventually need to be packaged in a way to share with the SHPD and other consulting parties.

The alignment shift from Aolele to Ualena would not adversely affect any additional historic resources. As shown on the map of the adjusted APE and resources that was provided last week, the Ualena alignment would not require property from any Historic Resources. The Historic Resources Technical Report developed to support the Draft EIS details the eligibility of resources located between Aolele and Ualena Streets. As detailed in that report and summarized in Table 4-32 of the Draft EIS, only the Hawaii Employers Council Building was determined National Register eligible.

The single resource in the vicinity (Hawaii Employers Council Building) that was determined to be adversely affected because the guideway would be visible from the resource in the case of the Aolele Alignment would continue to be affected by the Ualena Alignment for the same reason.

The City has drafted a letter for FTA to send to SHPD requesting concurrence with the determination of no additional eligible properties and no change to the finding of effect.

4. To support the administrative record, more information will be needed on the potential effects from City's preferred alignment presented in the draft environmental impact statement. We anticipate that HDOT and the Federal Aviation Administration will provide information on the impacts related to the Aolele alignment. Please provide your analysis of the potential effects at HNL.

Effects to Airport Facilities

The elevated Project guideway alignment through the airport was developed in consideration of the Honolulu International Airport Draft Master Plan (2009) and the Airport Layout Plan for Honolulu International Airport (1995) to minimize effects on existing and future airport facilities and aviation activities. Support columns will be located to maintain normal roadway movements and minimize effects to parking, car rental operations, lei stands, freight movement, and other business interests near the airport.

Specifically, the guideway alignment is being designed to minimize the effect on current and future operations at the airport. The guideway alignment has been located to avoid the new Mauka Terminal and airplane ramp planned for where the existing commuter terminal parking lot is located. A total of approximately two acres of airport land will still be needed to accommodate the placement of elevated guideway support columns and for a passenger station on airport property. A station entrance building would be constructed near the overseas parking garage on what is now a surface economy parking lot just 'Ewa of the parking garage exit lanes, fronting Alaonaona Street, near the existing lei stands on Aolele Street. Approximately 110 of the 175 spaces will be permanently closed in this lot to accommodate the station. The Honolulu International Airport Station will serve airline passengers and employees of the airport and other businesses. This station will be connected to the Overseas and Interisland Terminals with ground-level pedestrian walkways. Access to local buses and TheHandi-Van will be provided at the station's entrance.

Based on discussions with both HDOT-Airports Division and the United States Postal Service (USPS), DTS has adjusted the alignment to minimize overall impact to both facilities. Other design measures have been taken to minimize impact to Airport facilities. DTS will continue to coordinate with HDOT Airports Division and USPS on final alignment and design as the Project moves forward.

Continuing Koko Head, the alignment exits the airport on Aolele Street and then transitions to Ualena Street at an extension of Ohohia Street, which is about 2,000 feet 'Ewa of the Lagoon Drive Station. The alignment traverses airport property but does not preclude future commercial uses.

The guideway will pass near the end of runways 22R/4L and 22L/4R. Due to the proximity of the guideway to the runways, FAA Form 7460-1, Notice of Proposed Construction or Alteration will need to be submitted to the Federal Aviation Administration about two years prior to construction. Preparation of the necessary submittal materials has begun with assistance from HDOT-Airports staff. Honolulu International Airport Operations has evaluated the project impact and verified that it does not affect airport operations.

The Lagoon Drive Station has been located at the intersection of Waiwai Loop and Lagoon Drive. It will serve nearby businesses and employees in the area, including Māpunapuna and Salt Lake, and provide access to Ke'ehi Lagoon Park. Local buses and TheHandi-Van will provide service to the station.

The Federal Aviation Administration (FAA) has specific horizontal and vertical clearance requirements for the runways at Honolulu International Airport. Due to the proximity of the Project to runways 22R/4L and 22L/4R, the following clearance requirements were evaluated for the elevated project guideway, including the Lagoon Drive Station: building restriction line, runway protection zone, approach surface, and the transitional surface. The transition to Ualena Street was made to avoid the central portion of the runway protection zone. The Project will pass through a small

portion of the less-restrictive controlled activity area. The FAA has indicated this is acceptable. The airspace evaluation confirmed that the Project is consistent with requirements of the building restriction line, approach surface and transitional surface regulations. Results of the evaluation are shown in Appendix K. In addition, the Airport Layout Plan was updated in cooperation with HDOT and FAA to show the Project alignment and stations, and a copy is included in Appendix K. The City will coordinate with FAA to obtain the necessary permits and approvals related to construction at or near the airport.

Agency Coordination

The City has been coordinating with FAA, HDOT Airport Division, and FTA to address the effects of the alignment on the airport, including future expansion as proposed in the Airport Master Plan and FAA requirements. As a result of coordination, the decision was made to transition the alignment from Aolele Street to Ualena Street to avoid the runway protection zone and any impacts that would be created by mitigations such as relocating the runway to move the runway protection zone away from the Project if it were to remain on Aolele Street.

Construction-related Effects on Airport Facilities

Construction of the Project will have temporary effects on airport facilities and notification of any short-term obstructions (e.g., cranes and gantries) will be made to the appropriate parties. Temporary lane closures on Ualena Street and Waiwai Loop could cause short-term delays to trucking and deliveries at airport-related facilities. The economy surface parking lot will be closed during construction of the Honolulu International Airport station, and other nearby roadways could be temporarily affected when support columns and guideway sections are transported and installed. Additionally, lei stand parking may be temporarily relocated during construction.

(There could be additional information if we receive a report from the FAA.)

5. Resulting from the need to shift the runway, there was a question about intrusion into the lagoon to move or "bridge from existing foundations" the navigation lights which could result in ecological impacts and a Section 7 Endangered Species Act review. Please discuss and reference documentation on the potential impacts to threatened or endangered species and coastal wetlands. Include review steps by resource agencies.

Placeholder for 5.

6. The Aolele to Ualena alignment does not fully avoid the RPZ. Please provide information on this and detail changes at HNL that may be required to receive FAA approval.

Since the question of the RPZ was identified in June 2009, the City worked with HDOT-Airports and the FAA to find the best way to avoid impacts to the RPZ. In the case of Runway 4L/22R, there was recognition that its use by smaller, primarily general aviation Category A and B aircraft justified a 1,000 foot RPZ. The options considered for Runway 4R/22L varied from modifying the operational practices on the mauka end of the runway to moving the runway to developing an avoidance alternative. In all cases, the FAA insisted that the Central Portion of the RPZ (the extended Obstacle Free Zone) must remain unaffected by the Project. That was the basis for the City's efforts to clear the RPZ. At the same time, the FAA, which establishes the RPZ requirements, was willing to allow

limited use of the Controlled Activity Areas (CAA) of the RPZ (the outside edges) as long as no "places of public assembly," such as a station, are located within the RPZ. The Ualena guideway alignment uses only a small corner of the outer edge of the RPZ in an area still occupied by other buildings. The FAA also gave consideration to how the runway is used in practice. No large aircraft (Categories C and D) ever take-off toward the mountains on Runway 4R and very seldom land on 22L. The smaller aircraft that do use 4R always turn right, away from the affected portion of the CAA, once airborne to avoid the mountains. The FAA has attested to their acceptance of the use of the CAA at meetings on this subject and has been consistent in its position on the issue.

7. Detail mitigations that are required by HDOT for impacts to HNL.

The following mitigation measures have been requested by HDOT, or are in response to concerns raised by HDOT in their review of the DEIS and Admin FEIS, for impacts to Honolulu International Airport:

- In response to concerns regarding impacts to airport modernization projects, the guideway alignment is being designed to minimize the effect on current and future operations at the airport. The guideway alignment has been modified since the Draft EIS to avoid the new Mauka Terminal and airplane tarmac planned for where the existing commuter terminal parking lot is located. In this location, the guideway will enter the airport from above the H-1 Freeway near the Airport Interisland Terminal.
- The City will continue work with the airport to minimize disruption to travelers and businesses during construction of the guideway and stations. To the extent possible, all roadways will be kept open and access will be maintained. The economy parking lot will be completely closed during construction. Where existing parking is disrupted by construction, signs will be posted directing people to nearby locations with available parking. If the lei stand parking area needs to be temporarily relocated, signs will direct customers to the temporary parking area and from there to the lei stands.
- Near the overseas parking garage, a station entrance building would be constructed on what is now a surface parking lot just Ewa of the parking garage exit lanes, fronting Alaonaona Street. Pedestrian routes will connect the station to the Interisland and Overseas Terminals. Enhanced signage and wayfinding techniques will enable visitors to easily find the station from the airport terminals.
- HDOT recommended allowing baggage on rail vehicles; Chapter 2 of the Administrative Final EIS specifies that luggage will be allowed on trains.
- FAA Form 7460-1 will be submitted to FAA at the appropriate time, which is about 2 years prior to construction. This has been included in the list of permits and approvals in the Final EIS.
- DTS will continue to coordinate with HDOT Airports Division on the final alignment, location of support columns, and connection between the rail station and airport terminals.