March 19, 2010

Mr. Peter Rogoff, FTA Administrator

US DOT

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

Dear Mr. Rogoff:

Over the past six 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 recently extended runway protection zone (RPZ) for Runway 4R/22L at HNL. These discussions became necessary as a result of FAA regulation changes affecting HNL that took place in late 2007, after the Airport alignment was defined during the Alternatives Analysis and scoping for the Draft Environmental Impact Statement (EIS). Unfortunately, this critical change was not made known to the City during the development of the Draft EIS or during the Draft EIS public and agency comment period. Instead, the project relied upon the current Airport Layout Plan (ALP) which continues to show a much shorter RPZ. The revised extended RPZ only became known to the City in mid 2009 during preparation of the Final EIS.

The discussions among all the agencies have yielded a vast amount of information regarding the need to mitigate any 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 DEIS has never been determined to be infeasible, the FAA has generated a long list of measures that make the likelihood of a rapid resolution of real and potential impacts to the FAA's satisfaction highly unlikely.

Any further delay will add substantially to project cost and jeopardize construction progress as well as our plan to stimulate the local economy with a large number of project-related jobs. So, in the interest of moving the project forward as expeditiously as possible, I am hereby notifying the FTA that the City that the administrative copy of the Final EIS will be revised to reflect an alignment that will mitigate any encroachment into the central portion of the RPZ of Runways 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 impacts resulting from the mitigation.

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

Sincerely,

Mufi Hannemann

Mayor