

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 several months, the City and County of Honolulu (City) has been in discussions with the Federal Transit Administration (FTA), the Federal Aviation Administration (FAA), and the Hawaii Department of Transportation – Airports Division (HDOT) over the best way to address impacts associated with a short segment of the rail guideway that crosses the extended runway protection zone for Runway 4R/22L at Honolulu International Airport (HNL). These discussions became necessary as a result of FAA changes affecting the runway protection zone at HNL. The City became aware of the changes considerably after the close of the public comment period in January 2009 on the draft environmental document; analysis pertinent to the runway protection zone in that document relied upon the Airport Layout Plan that remains in place today and continues to show a much shorter runway protection zone.

Comment [cb1]: What the City knew and when is an issue; would you please make sure that the passages in this paragraph accurately reflect the facts, Liz.

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 and protect air traffic, the traveling public, and people and property on the ground. While the City's proposed mitigation of those effects along our preferred rail route alignment may be feasible, the analysis and cost of on-airport changes to accommodate the preferred alignment that would be required to comply with FAA's runway protection zone regulations make the likelihood of a rapid resolution of issues 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 project-related jobs. In the interest of moving the project forward as expeditiously as possible, I am proposing that the environmental analysis be revised to reflect an alignment that will avoid any encroachment into the central portion of the runway protection zone of Runways 22L/4R. The alignment through the airport area will still be primarily on Aolele Street but will shift approximately 2,000 feet west of Lagoon Drive. We will work with FTA on an analysis that fully discloses the impacts associated with the avoidance alternative.

Comment [cb2]: Like Ray, I was concerned that the City was directing that the issue will be resolved in the final EIS; the changes here seek to remedy that problem, although I continue to believe that the issue can be resolved in the context of the final impact statement without supplementation.

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