MEMORANDUM

TO: Administrator Peter Rogoff
FROM: Susan Borinsky, Associate Administrator for Planning and Environment
DATE: February 26, 2010
RE: Meeting with Kate Lang, FAA Acting Associate Administrator for Airports

MEETING OVERVIEW

You will be meeting with Kate Lang to review the status of FAA's assessment of the alignment of the proposed Honolulu High Capacity Transit Corridor Project through Honolulu International Airport. Ben Deleon, FAA Director for Airport Planning and Programming, will also attend.

TOPIC OF MEETING & TALKING POINTS

The November 2008 Draft EIS for the project indicated that the alignment preferred by the City and County of Honolulu (the City) would be through the Salt Lake area, but also identified an alternative alignment at the Honolulu International Airport. In February 2009, the City chose the airport alternative as the preferred alternative. In June 2009, FTA's Project Management Oversight Contractor (PMOC) for the project discovered that the airport alignment is located within the recently expanded runway protection zone (RPZ) for two runways at Honolulu International Airport.

In light of the changed alignment, in December 2009, FAA chose to become a "cooperating agency" in the environmental review instead of remaining in the lesser role of "participating agency." The FAA regional office in Hawthorne, California, assumed lead FAA responsibilities for the project that had previously been handled by the local FAA office in Honolulu. The FAA regional office initiated work with the Airports Division of the Hawaii Department of Transportation and various airport users to identify airport impacts of the rail alignment that were not addressed in the Draft EIS's treatment of the airport alternative.

FAA staff indicated that they would transmit to FTA in mid-January their conclusions on the preferred airport alignment, its impacts on airport operations, and required mitigations of those impacts, and any subsequent necessary modifications to the project alignment and/or the FEIS. The mid-January target has slipped and FAA now estimates that a draft statement of the project's impacts on the airport will be provided in the next two weeks.

FAA has informally conveyed to FTA its initial findings (attached) that the City's preferred alignment would require relocation of a runway, causing a series of secondary impacts including the potential for permanent noise impacts on locations adjacent to the airport. FAA has informally estimated the cost of the runway relocation and associated mitigations at $106-$132 million. Other impacts, mitigations, and costs may be forthcoming as FAA concludes its work. As part of the assessment, the City has prepared engineering drawings and cost estimates for three additional alignment alternatives that would avoid the RPZs and, consequently, the runway relocation and associated mitigations. At this point, it appears that at least one of these alternative alignments would have fewer environmental impacts and would cost less than the preferred alternative. The City administration, however, is reluctant to change the preferred alignment – at least in part because the decision would involve the City Council and provide yet another forum for project opponents.

The FEIS is on hold pending resolution of the alignment through the airport. FTA continues to look forward to formal communication of FAA conclusions on the alignment.

NOTABLE BACKGROUND

The entire Hawaii Congressional delegation has been supportive of this project, particularly Senator Inouye.

Hill staff has asked FTA staff why FAA did not become a cooperating agency in the NEPA review process until December 2009. The reasons are that (1) the original preferred alignment bypassed the airport until the City decided in February 2009 to reroute the project through the airport area, (2) FAA had been relying on the involvement of the Hawaii DOT's Airports Division to deal with impacts at the airport, and (3) the conflict with FAA requirements at the airport was not known until its discovery by the FTA PMOC in June 2009.

Attachment
FTA Summary of the Status of the FAA Assessment

On February 3rd, FAA staff briefed Kate Lang, Associate Administrator for Airports, about the issues related to RPZ impacts, need for FAA-approval of an Airport Layout Plan (ALP) update prior to completion of the FEIS and significant impacts to airport operations near a proposed cargo site. In addition, FAA identified the following concerns which they are in the process of researching more detail on these issues:

1. Proposed mitigation is contrary to FAA Advisory Circular (AC) 150/5300-13, Airport Design, which indicates the FAA does not use declared distances to allow adverse impacts to runways that currently meet FAA Airport Design Standards for RPZ's and RSA's at unconstrained airports.

2. A full Medium Intensity Approach Lighting System with Runway Alignment Indicator Lights (MALSR) for Runway 4R would not be able to be installed to the south due to conflicts with the parallel taxiway on Runway 8R/26L (the Reef Runway). Only a MALS could be installed with an increase in the approach minimums to ¾ mile.

3. The relocation of the MALSR would also require repositioning the light bar stations into the environmentally sensitive lagoon south of Runway 4R/22L. This will require additional environmental documentation and coastal permits, lengthening the overall Federal Transit Administration EIS schedule.

4. Runway 4R/22L (150' x 9000') is one of only two runways at HNL with an Instrument Landing System (ILS). This would leave only one ILS runway at the main civil airport on the Island of Oahu, during any construction on 4R/22L. There are no other commercial service airports on the island. Alternate plans for adding an ILS to Runway 4L or 8R would require additional runway lengthening on Runway 4L and concerns with installing a MALSR into coastal waters for Runway 8R.

5. Runway 4R/22L is heavily used during Kona Wind conditions - approximately 20 percent of the time annually. It is also used during the night time as a noise abatement procedure to reduce noise impacts to residential communities west of the airport. Any closure of this runway would disrupt airport operations, would increase noise impacts to residential communities west of the airport and require additional noise disclosure information in the EIS. This may require a new Part 150 study at HNL due to an increase in runway utilization for Runway 8L.

6. The Air Traffic Organization (ATO) has raised concerns that without an additional connector taxiway, aircraft would remain longer on the shifted Runway 4R/22L and reduce the landing rate on 4R. This additional taxiway will be added to the mitigation cost estimates. ATO indicates the departure rate for aircraft on Runway 8R would be reduced, since light aircraft on a left downwind to the relocated runway 4R would likely overfly runway 8R to line up for a landing.

7. The proposal by CCH to limit the approach to Runway 22R to small aircraft only, will inhibit any future potential for expansion and use of this runway by larger aircraft.

8. The main and back-up power and communications cables for the Honolulu Control Facility (HCF) are located to the south of the Runways 4L/4R and would require an extremely sensitive relocation. The HCF is a critical facility that provides combined control of en-route air traffic, arrivals, departures, and over-flights in and around the numerous airports of the Hawaiian Island chain, as well as to aircraft from the U.S. Mainland, Asia, South Pacific, New Zealand and Australia.