When was the surface option evaluated?
Surface options were evaluated in throughout the corridor in the alternatives analysisthroughout planning and environmental assessment of the proposed rail project.

The alternatives analysis that concluded in November 2006 began with a screening analysis of alternative horizontal and vertical alignment options in eight local segments that comprised the entire corridor. The screening analysis eliminated many options in each segment, including various at-grade, elevated, and subway options. The surviving options – including at-grade options in several segments – were then subjected to detailed assessment in the rest of the alternatives analysis. The final report presented four fixed-guideway alternatives that spanned the full length of the corridor. These alternatives included at-grade alignments in Kapolei on the west, along the H-1 viaduct near the airport, and on Hotel Street through downtown Honolulu. The alternatives did not include a full-length at-grade alternative. The subsequent evaluation of the four full-length alternatives included an extensive analysis of visual impacts documented in a separate technical report that includes visual modeling of elevated guideways in various locations throughout the corridor.

In February 2007, the City chose the preferred alternative – a fixed guideway project that is elevated throughout the corridor except for a short segment of at-grade running in Kapolei.

Why was the surface option eliminated?
In the screening analysis conducted in early 2006, criteria for elimination of at-grade options in the eight local segments of the corridor included poor accessibility to activity centers, impacts on parklands and historic sites, traffic disruption, the cost of right-of-way acquisition, and other location-specific conditions.

Regarding the elimination of an entirely at-grade alternative, Chapter 2 of the administrative draft of the FEIS summarizes the reasoning:

> "Corridor-wide at-grade light-rail transit was rejected because it would have required conversion of traffic lanes to rail throughout the corridor, thereby substantially reducing roadway capacity since no abandoned or undeveloped alignments are available in the study corridor. At-grade light-rail would have required either the acquisition and removal of buildings throughout the corridor or the conversion of two or more traffic lanes. Acquisition of right-of-way and the associated displacements would be required for stations in any event. An at-grade system would not have provided a reliable, high-capacity, exclusive right-of-way system. Short blocks in the downtown area would limit the length of trains to two vehicles, and coordination of signals would limit headways to three minutes. This would prevent any future expansion of capacity. Average speed would be approximately one-half of that of an exclusive right-of-way system."

A broader perspective also includes the then-recent experience with the proposed bus rapid transit system, including at-grade segments through downtown Honolulu and nearby urbanized parts of the corridor. The principal objections that led to substantial downsizing of the project were the taking of traffic lanes and on-street parking for use by BRT buses and stations.

When did State agencies have the opportunity to voice concern about the selection of the LPA?
In addition to ongoing coordination with various State agencies that have jurisdiction (environment, streets and highways, cultural and historic resources, etc.) over several aspects of the proposed project, State agencies have had two principal opportunities for formal comment on the selection of the LPA:

1. The NEPA scoping process conducted in March-April 2007 – particularly the agency scoping meeting held on March 28, 2007 – approximately two months after the City chose the LPA. A comprehensive list of State agencies were invited to the meeting.

   The State agencies that attended the meeting were:
   - Department of Accounting & General Services
   - Department of Education
   - Department of Health
   - Community Development Authority
   - University of Hawaii

   Among the State invited agencies not attending the meeting were the Department of Transportation (Highways, Airports, and Harbors Divisions, invited separately) and the Office of Environmental Quality Control). In subsequent written comments, the Department of Transportation asked that the EIS consider an alignment through the airport and evaluate the project's traffic impacts on State highways. No other State agency provided comments during NEPA scoping.

2. The circulation period for comments on the Draft EIS in November-December 2008.

   Thirteen State agencies provided comments. None surfaced the question of at-grade alternatives. The commenting State agencies were:
   - Department of Transportation
   - Office of Environmental Quality Control
   - Department of Land & Natural Resources
   - Department of Budget & Finance
   - Hawaii Community Development Authority
   - Department of Accounting & General Services
   - Department of Agriculture
   - Office of Civil Defense
   - Disability & Communication Access Board (2 separate comments)
   - Department of Business, Economic Development & Tourism (2 separate comments)
   - Department of Education
   - Office of Hawaiian Affairs
   - Department of Health

Regarding the absence of State agency comments on either visual impacts or project costs, the Honolulu Advertiser wrote this on November 29, 2009:

> "State transportation Director Brennon Morioka said comments submitted by state agencies were limited to addressing how the train would affect each agency. The governor's job is to look at the broader implications of the project, he said."