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GOVERNOR



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IN REPLY REFER TO:

STP 8 3074

January 29, 2009

Mr. Wayne Y. Yoshioka, Director
City and County of Honolulu
Department of Transportation Services
650 South King Street, 3rd Floor
Honolulu, HI 96813

Dear Mr. Yoshioka:

Subject: Honolulu High Capacity Transit Corridor Project Draft Environmental
Impact Statement (DEIS) and/Section 4(f) Evaluation

Thank you for providing the subject document for review and comments.

The State Department of Transportation (DOT) understands that the subject DEIS discusses a project by the City and County of Honolulu, Department of Transportation Services (DTS), for the development of a High Capacity Transit Corridor Project ("Project") that would provide a fixed guideway transit service on Oahu in a travel corridor between Kapolei, with potential expansion to the University of Hawaii at Manoa (UH Manoa) and Waikiki.

Four alternatives are identified via a series of screening and scoping studies. This DEIS evaluates those four alternatives:

1. No Build Alternative
2. Fixed Guideway Transit Alternative via Salt Lake Boulevard (Salt Lake Alternative)
3. Fixed Guideway Transit Alternative via the Airport (Airport Alternative)
4. Fixed Guideway Transit Alternative via the Airport and Salt Lake Boulevard (Airport & Salt Lake Alternative)

The Locally Preferred Alternative selected by the Honolulu City Council includes a fixed guideway transit system from East Kapolei to Ala Moana Center and planned extensions to West Kapolei, UH Manoa and Waikiki. The system would use steel-wheel-on-steel-rail technology and all parts of the system would either be elevated or in exclusive right-of-ways. The Project also requires the construction of transit stations and supporting facilities. Further, some city bus services will be reconfigured to align with the proposed transit stations.

The Project will generate significant impacts to DOT airports, highways and harbor facilities. The fixed guideway rail system should be viewed as part of a comprehensive, multi- and inter-modal transportation system. This requires early, continuous, direct coordination and careful design and construction planning with the DOT. The Project requires connectivity with other transportation and transit systems as well as all other means of transportation used by commuters and travelers such as, but not limited to, buses, taxis, shuttles, service vans, motorcycles, scooters, bicycles and walking. The Project must be carefully integrated within the existing systems and enable travelers' transfers between these systems. DOT therefore recommends that these linkages and public use patterns for all modes of travel (i.e. bus, bike, pedestrian, etc.) be further analyzed. DOT is particularly interested in the evaluations, findings and recommendations at the sites where DOT facilities are located.

The following comments are from the DOT's three modal divisions, who should be consulted during the Project's planning, design and construction phases for their concerns for impacts to right-of-ways, easements, real property and infrastructure.

AIRPORTS

The two airport alternatives will impact the airport system. DOT requests that DTS contact the Airports Division Planning Section at (808) 838-8810 and address the following issues:

1. The Airports Division understands that the Airport Alternative involves two stations on the Honolulu International Airport (HNL) property on Aolele Street. One is next to the new parking structure and the other is at Lagoon Drive.
2. The station adjacent to the new parking structure will be connected to the structure. Clear signage is necessary for rider's access of the other airport terminal buildings. There are several operational and engineering issues related to a transit station located near an Airport terminal in relative proximity of airport operational areas (AOA). DTS should meet with Airports staff and the Airports modernization team to address the rail station's location, its impact on airport operations and future airport improvements.
3. To ensure that the Lagoon Drive station meets the Federal Aviation Administration (FAA) FAA Part 77 obstruction height limits for the end of Runway 22R, DTS should submit a FAA Form 7460-1, Notice of Proposed Construction or Alteration, to the FAA.
4. DTS should also meet with the Transportation Security Administration (TSA) to review any security issues or requirements for the rail stations at HNL.

HARBORS

The project will generate impacts to the harbors system, particularly where the transit stations are adjacent to Honolulu Harbor. DOT requests that DTS address the following comments and initiate or continue coordination with the Harbors Division Planning Section at (808) 587-1888.

1. Page 2-32. The DOT understands that the rail system interfaces with Nimitz Highway in the area between the Pier 15 area and past the HECO power station area. Figures 2-33 and 2-34 show the two stations in this area. The stations appear to avoid conflicts with the entrances to Harbors' major shipping terminals.
 - a. DOT requests consideration for a station located at the Aloha Tower complex to provide direct access to the complex and to downtown Honolulu via Fort Street. If this location is given consideration, then Harbors Division is willing to discuss options for redeveloping its current office building into a combination parking structure and transit station, subject to the need to satisfy the community's concern regarding the image and appearance of downtown Honolulu and Nimitz Highway as a pathway to Waikiki.
 - b. Given the importance of this section of Nimitz Highway to the waterfront area and to downtown Honolulu, additional study is needed to ensure proper siting of a transfer station. Proper placement is critical for minimizing impacts to the harbor area, the highway system and the Aloha Tower complex, and also for maintaining waterfront access, pedestrian safety, a desirable visual and spatial atmosphere and the proper aesthetics for downtown Honolulu. DTS should consult with DOT and the downtown stakeholders on the location of this transit station.
2. Page 3-14. Please note that Kewalo Basin is DOT Harbors third Oahu harbor but is soon to be transferred to the Hawaii Community Development Authority (HCDA) Charter Boat operations as mentioned in the document occur at this harbor and not at Honolulu or Kalaeloa Barbers Point Harbor.
3. Page 3-14. Ocean Recreation is not an activity of DOT's commercial harbor system. Ocean Recreation is under the jurisdiction of the DLNR – Division of Boating and Ocean Recreation.
4. Page 3-14. Trucks carrying freight enter Honolulu Harbor through Nimitz Highway and also Ala Moana Boulevard (at Fort Armstrong). The roadway fronting Fort Armstrong is Ala Moana Boulevard and not Nimitz Highway.
5. Page 3-14. Please also include Kalihi Street in the discussion of freight movement. Eastbound container trucks utilize Kalihi Street to get onto Interstate Route H-1.

6. Page 3-44 The correct name for Oahu's second harbor is Kalaeloa Barbers Point Harbor. It is noted as Barbers Point Harbor on this page and elsewhere
7. Page 3-48. It is noted that alternative routes may be required as an impact of the construction of the improvements. Any improvement required to facilitate alternative routes (turning radius, etc.) should be the responsibility of the Project as a mitigation measure.
8. Page 4-61 Kewalo Basin should also be included in the discussion of the makai edge
9. Page 4-171. There is no "Kalaeloa Harbor 2020 Master Plan" or "Honolulu Harbor 2020 Master Plan" The Oahu Commercial Harbors 2020 Master Plan incorporates both Honolulu and Kalaeloa Barbers Point Harbors.

HIGHWAYS

DOT also confirms that there will be impacts to the highway system. At a significant number of locations, the rail line, transit stations and other Project support facilities will be functionally adjacent to, physically abut or transect highway system roadways and right-of-ways. The transit-oriented development (TOD) within the communities around the rail stations will also impact the highways system. DOT requests that DTS address the following comments and initiate or continue coordination with the Highways Division Planning Branch at (808) 587-1830.

1. Chapter 3 various pages. Planning horizon of 2030 is used throughout the document. Standard practice is 20 years after construction completion. With a construction completion in 2018, the planning horizon should be 2038
2. Page 4-98 3rd paragraph. The reference, "The State of Hawaii regulates community noise pollution through HAR 11-16," is incorrect. The correct reference is HAR 11-46. In addition, Hawaii's noise levels are more restrictive than the Federal levels and the project needs to conform to both requirements. HAR 11-46-4 has maximum permissible sound levels in dBA (dBA defined as the A-weighted sound level or unit of measurement describing the total sound level of all noise as measured with a sound level meter using the "A" weighting network). The following is the maximum level

	Day time (7am-10pm)	Night time (10pm-7am)
Class A	55	45
Class B	60	50
Class C	70	70

Class A includes all areas equivalent to land zoned residential, conservation, preservation, public space, open space, or similar type

Class B includes all areas equivalent to lands zoned for multi-family dwellings, apartment, business, commercial, hotel, resort, or similar type.

Class C includes all areas equivalent to lands zoned agriculture, country, industrial, or similar type.

3. Kamehameha Highway Improvements – Waihona Street to Center Drive. DTS should coordinate Project work with improvements to this area.
4. Design Criteria. DOT Highways requests all streetscape improvements by DTS utilize DOT Highway standard drawings, details and specifications. Particularly, as follows:
 - a. A visual picture record of assets within the highway right-of-way prior to construction shall be made by DTS and approved by DOT's Highway Landscape Architect for restoration afterwards. In general, all landscaping shall be restored to its original condition after construction is complete. DTS should provide As-built drawings in the form of both full size drawings and electronic files of all work within the highway right-of-way.
 - b. Work within the highway right-of-way shall employ DOT Highway standard Invasive Species Management specifications and Tree Protection zone construction detail. All transplantable trees as determined by DOT to be removed by construction shall be transplanted at DTS' expense to another State right-of-way site approved by DOT's Highway Landscape Architect.
 - c. DTS shall not move relocated utilities under DOT sidewalks and should consult with DOT for exceptions. New utility boxes shall be screened by landscaping or placed in underground vaults.
 - d. The handling of the anticipated additional trash in between stations needs further explanation.
 - e. All median underneath the rail shall be low maintenance rockscape or decorative paving with limited, shade tolerant plantings at intersections
 - f. New plantings shall be non-invasive plants as defined by the Hawaii Chapter of the American Society of Landscape Architects. DTS shall employ native plants where they are the best choice for the conditions.

- g. The design of the rail should include measures to limit bird nesting and perches that produce bird droppings

5 Construction Criteria

- a. During construction, DTS shall maintain all landscaped areas to DOT Highway standards utilizing DOT maintenance specifications including mowing, edging and trimming, weeding, pruning and care of shrubs and trees, fertilizing, pesticide and herbicides, clearing gutters, swales and ditches, invasive plant removal and rubbish and debris removal and disposal.
- b. DTS shall be responsible for maintaining all irrigation impacted during construction and provide watering as necessary. All site furnishings that are removed during construction including but not limited to traffic signal poles and heads, irrigation controllers and valves, backflow preventers, fence fabric and utility boxes shall be delivered at DTS' expense to the DOT Highways Oahu District Baseyard or disposed of at DTS' expense if DOT does not desire to keep the items

6 Farrington Highway - Fort Weaver Road to Interstate Route H-1

- a. In recognition of Farrington Highway as the main street of Waipahu, DOT spent \$4 million dollars in 2002 for a main street revitalization project. In 2005, the project received the Betty Crocker Landscape Award from the Scenic Hawaii organization.

"This project sponsored by the State Department of Transportation helped transform a bleak, lifeless, uninviting part of Farrington Highway for motorists. The result is landscaping effort that quickly changed the area and which will continue to improve ..."

- b. DOT's interaction with the Waipahu community has been overwhelming positive and the improvements to Farrington Highway have contributed to a greater sense of pride and renewal in the community. As a result, adjacent properties have been improved and new businesses have moved in along the highway.
- c. Since the Project is going to remove these significant improvements to Waipahu's main street and add a rail structure further affecting the aesthetics, DOT requests DTS consult with DOT and the Waipahu stakeholders to provide equitable improvements to the sidewalks to include material sidewalk improvements, street trees, site furnishings and undergrounding of overhead utilities.

- d All existing median trees to be removed by Project construction shall be transplanted at DTS' expense to another State right-of-way site approved by DOT's Highway Landscape Architect.
- 7 Kamehameha Highway - Interstate Route H-1 to Aloha Stadium. Kamehameha Highway is the main street for two communities; Aiea and Pearl City. Since 2005, DOT has worked with the Aiea and Pearl City communities through an extensive public involvement process to identify improvements to this main street. Through this process, the community and DOT agreed to improvements that were suspended pending the outcome of rail. This Project installs a rail structure to the area, which could negatively impact the area aesthetics. Therefore, DOT requests that DTS consult with DOT and the Aiea and Pearl City stakeholders to provide equitable improvements to the sidewalks, such as material sidewalk improvements, street trees, site furnishings, enhancement of areas around Sumida Watercress farms and undergrounding of overhead utilities.
 - 8 Nimitz Highway - Nuuanu Stream Bridge to Halekauwila Boulevard.
 - a. Nimitz Highway from Nuuanu Stream Bridge to Halekauwila Boulevard abuts the downtown central business district waterfront and some of the most valuable real estate in the State of Hawaii. It is also the point of arrival for all cruise ship visitors to Oahu. Additionally, Hawaii Tourism Authority's research indicates over 80% of Oahu visitors' first impression of Hawaii is driving from the Airport to Waikiki via Nimitz Highway. For over 20 years, the downtown community has explored means to relocate the HECO power plant that detracts from this valuable waterfront area. The addition of a rail structure and station located near the HECO power plant will require further study of the Nimitz Highway corridor and a careful analysis of impacts to the Aloha Tower complex and adjacent harbor facilities. Also, care must be taken to maintain pedestrian safety as well as to avoid creating a less than desirable visual and spatial atmosphere for visitors and residents moving through this area. The aesthetics, image and appearance of downtown Honolulu are areas of great concern to the community. Therefore, DOT requests DTS consult with DOT and downtown stakeholders on this matter and to provide equitable improvements to the sidewalks including material sidewalk improvements, street trees and site furnishings.
 - b. Recognizing the importance of this stretch of Nimitz Highway, in 2008 DOT installed plantings of coconut palms. As such, all existing median trees to be removed by Project construction shall be transplanted at DTS' expense to another state right-of-way site approved by DOT's Highway Landscape Architect.

DOT appreciates the opportunity to provide comments. Given the anticipated and potential impacts to multiple DOT facilities, it would be beneficial to have DTS make periodic presentations to DOT as part of the on-going Project planning and coordination with DOT.

Mr. Wayne Yoshioka
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Presentations should cover issues such as the Project task list and timeline, coordination for design and construction phasing, environmental issues and mitigation measures and physical impacts to and integration with DOT airport, harbors and highway systems. Further, these meetings should include all or combinations of the modal divisions based on the particular subject matter or area and location being discussed.

If there are any questions regarding all three modal divisions of DOT, please contact Mr. David Shimokawa of the DOT Statewide Transportation Planning Office at (808) 587-2356.

Very truly yours,



BRENNON T. MORIOKA, PH.D., P.E.
Director of Transportation

c: Mr. Abraham Wong, Federal Highway Administration
Mr. Ted Matley, Federal Transit Administration
Ms. Katherine Kealoha, Office of Environmental Quality Control