

FTA Comments

1. The following insert is to be added at the points indicated in the mark-ups.

Insert #1:

The City and County of Honolulu and FTA are committed to all of the measures described in this document for mitigating each adverse effect of the Project. The mitigation measures are now part of the Project. The Project, including the mitigation measures, may not be changed without FTA's written approval of the change. FTA would consider such approval only after an appropriate environmental review of the environmental effects of the change has been completed by the City.

2. The City has not been able to elicit FAA's approval of the proposed alignment at the airport, even with the mitigation commitments recently discussed. The FAA and airport operator need additional preliminary engineering studies before they can commit to an alignment. Therefore, in order to avoid delaying the FEIS while the additional PE is being conducted, the alternative at the airport which avoids the adverse effects on current airport operations must be described in the FEIS and fully evaluated in terms of its impacts and cost. This avoidance alternative is mentioned in the City's draft letter to FTA on the airport issue.

3. Regarding the preferred alternative at the airport: The mitigation discussed with FAA at the meeting in late October attended by FTA, FAA, and others must be presented in the FEIS and committed to, subject to approval by FAA.

4. The airport issues in the previous two comments above may be appropriate for a new subsection in Chapter 3 (Transportation Impacts) that deals strictly with the impacts on aviation. An alternative location in the document may be better, but a scan of the Table of Contents does not suggest one.

5. The Distribution List seems to be missing individuals and organizations that commented on the DEIS, either at the hearing or in writing. CEQ regulations (40 CFR 1502.19) require that the FEIS be sent to parties who commented on the DEIS. To save distribution cost, the City may want to cut back on the extensive list of politicians included on the Distribution List -- only those who commented must be included, though others may be included at the City's discretion.