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May 21, 2010 RT10/09-337214

Ms. Renee Ing
P.O. Box 23094
Honolulu, Hawaii 96823

Dear Ms. Ing:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address comments regarding the above-referenced submittal:

As discussed in Chapter 2 of the Final EIS, additional alternatives, including other technologies, were evaluated during the Alternatives Analysis phase of the Project. The Alternatives Analysis phase evaluated a range of transit mode and general alignment alternatives in terms of their costs, benefits, and impacts. An initial screening process considered alternatives identified through previous transit studies, a field review of the study corridor, an analysis of current population and employment data for the study corridor, a

literature review of technology modes, work completed for the Oahu Regional Transportation Plan 2030 (ORTP) prepared by the Oahu Metropolitan Planning Organization (OahuMPO) (OahuMPO 2007), and public and agency comments received during the formal Alternatives Analysis scoping process.

During the fall of 2005 and winter of 2006, the City and County of Honolulu (City) completed the alternatives screening process that is documented in the Honolulu High-Capacity Transit Corridor Project Alternatives Screening Memorandum (DTS 2006a). Scoping meetings were held with the purpose of presenting alternatives to the public, interested agencies, and officials and receiving comments on the Purpose and Need, alternatives, and scope of the Alternatives Analysis. Refinements were made to the alternatives as a result of public comments. Rubber-tire fixed guideway vehicles were considered a technology option throughout the Alternatives Analysis.

The following alternatives were studied in the Alternatives Analysis: No Build Alternative, Transportation System Management (TSM) Alternative, Managed Lane Alternative, and the Fixed Guideway Alternative. After review of the Alternatives Analysis Report and consideration of public comments, the City Council selected a fixed guideway transit system extending from Kapolei to UH Manoa with a connection to Waikiki as the Locally Preferred Alternative. The selection, which eliminated the TSM and Managed Lane Alternatives, became Ordinance 07-001 on January 6, 2007. The fixed guideway system is the most cost-effective system of all the alternatives studied.

As stated in Section 2.2.3 of this Final EIS, the NEPA Notice of Intent requested input on five transit technologies. A technical review process that included the opportunity for public comment was used in parallel with the alignment analysis to select a transit technology. The process included a broad request for information that was publicized to the transit industry. Transit vehicle manufacturers submitted 12 responses covering all of the technologies listed in the Notice of Intent. Rubber tire on concrete systems, including the Phileas system, were evaluated by an independent five-member technology panel comprised of four transit experts and a transportation academic that was appointed by the City Council. The panel considered the performance, cost, and reliability of the proposed technologies. The Phileas bus, was evaluated as a high capacity bus option. The guidance system that is under development is still experimental and not able to meet the operating requirements posed by the Review Panel. Likewise, fuel cell propulsion systems and other developing and promising technologies were considered but not retained as they are not yet available in full production form. The panel accepted public comment twice as part of its review. By a four-to-one vote, the panel chose a steel wheel operating on steel rail system. The four panel members selected steel-wheel technology because it is , safe, reliable, economical, and non-proprietary. Proprietary technologies, meaning those technologies that would have required all future purchases of vehicles or equipment to be from a single manufacturer, were eliminated because none of the proprietary technologies offered substantial proven performance, cost, and reliability benefits compared to steel wheel operating on steel rail. The Phileas system, by comparison does not yet have a functioning guidance operation. At this point in time, it effectively operates as a bus that cannot provide the reliability and safety of the guideway technology chosen by the

panel. Based on manufacturer performance information, Phileas is also not materially quieter than the proposed steel wheel rail system. Furthermore, selecting a proprietary technology also would have precluded a competitive bidding process, likely resulting in increased overall project costs. The panel's findings were summarized in a report to the City Council dated February 22, 2008.

A guided-bus system operating on an exclusive guideway following the same alignment would not reduce adverse effects, including property acquisitions of the Project. Changing the alignment would only move the effects to a different location. During the Alternatives Analysis process at the beginning of the project, a broad range of alignments were considered. When a historic property or park / recreational property was found to have a potential impact, alternate alignments were studied, as discussed and documented in 5.2, 5.3 and 5.5. of the Final EIS.

Comment [k1]: This is not true and this language should be removed.

As documented in Section 4.10 of the Final EIS, with mitigations, the Project would not have any noise impacts to residences or businesses based on FTA noise criteria and guidance. The Final EIS includes additional information about how any severe noise impacts measured after project operation would be treated. As stated in Section 4.10.3 of the Final EIS, the Project will cause no severe noise impacts. Moderate impacts will occur at upper floors of a few high-rise buildings (as shown in Table 4-18 in the Final EIS). With the recommended mitigation in place (noise blocking parapet wall, sound absorbing material and wheel skirts), the noise analysis indicates that the new noise generated by the Project will be lower than the existing (2009) noise levels in most locations.

Comment [k2]: This entire paragraph contradicts itself. We cannot say there are no impacts. There are impacts that will be mitigated. Please be careful with the use of the owrd impacts and severe. State that there are impacts that will be mitigated. Also, we need to explain what parapet walls and wheel skirts are and what their function is. We are writing so a layperson may understand.

The project design includes an integrated noise-blocking parapet wall at the edge of the guideway structure that extends three feet above the top of the rail. The parapet wall will substantially reduce ground-level noise.

In areas with high-rise apartments and hotels that have lanais above the elevation of and facing the rail, the parapet wall will have a limited benefit (less than a 3-dBA noise reduction) at floors above the level of the guideway. Wheel skirts will increase the benefit from the parapet wall at locations above the elevation of the track. The use of sound-absorptive materials below the tracks in the three areas that will experience moderate noise impacts will reduce the Project noise levels from the upper floors to below the impact level. Once the Project is operating, noise levels will be re-measured to confirm that there are no noise impacts from the Project. If additional noise impacts occur, then FTA will require the evaluation of measures to address the impacts.

Comment [k3]: Change to mitigate

Chapter 8 of the Final EIS details the Project's public involvement activities, including scoping and Public Hearing dates. The Project conducted numerous Community Information Meetings, manned booths at public events, conducted Speakers Bureau presentations, and maintained a website and hotline to solicit public comment throughout the planning process.

The estimated implementation cost for guided buses operating in exclusive right-of-way is not substantiated. Actual cost of constructing an elevated exclusive busway serving the same area as the Project would be similar to the cost to implement the Project with the selected

technology because the guideway would be of a similar size. If the guideway were designed to highway standards to accommodate any form of unguided vehicle, it would be larger and more costly. If multiple access points were provided, the right-of-way needs and cost would be substantially higher. The proposal to construct the busway in a cut-and-cover tunnel would further increase the cost relative to the elevated alternative considered through the Alternatives Analysis process.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Issuance of the Record of Decision under NEPA and acceptance of the Final EIS by the Governor of the State of Hawaii are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure