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May 21, 2010 RT10/09-337646

Mr. Mike Uechi
98-111 Kaahele Place
Aiea, Hawaii 96701

Dear Mr. Uechi:

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:

Comments on Chapter 2 of the Draft EIS: Alternatives Considered

Technology related to transportation continues to evolve. Improvements to all modes, including transit and single-occupant vehicles, will make those modes safer and more efficient. The changes mentioned in the comment may make the internal combustion engine used in automobiles today obsolete; however, they would enhance the attractiveness of an electrically-powered rail system, which already consumes less energy per passenger-mile carried than automobiles, as is illustrated by the reduced energy demand shown in Section 4.11 of the Final

EIS. Furthermore, none of the technologies mentioned in the comment letter (Mag-Lev; Sky-Tran and the Phileas system) are available for broad application at this time. They are all experimental or in demonstration modes.

As discussed in Chapter 2 of the Final EIS, additional alternatives, including other technologies, were evaluated during the Alternatives Analysis phase of the Project (2005 to 2006). 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 (fall of 2005 to winter of 2006) 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. The alternatives screening process is documented in the Honolulu High-Capacity Transit Corridor Project Alternatives Screening Memorandum (DTS 2006a).

Three scoping meetings were held as part of the screening process in December 2005 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:

- *December 13, 2005: Neal S. Blaisdell Center, Pikake Room at 777 Ward Avenue in Downtown Honolulu from 2:00 pm to 4:00 pm (agency scoping meeting)*
- *December 13, 2005: Neal S. Blaisdell Center, Pikake Room, at 777 Ward Avenue in Downtown Honolulu from 5:00 p.m. to 8:00 p.m. (open to the public)*
- *December 14, 2005: Kapolei Middle School Cafeteria at 91-5335 Kapolei Parkway in Kapolei from 7:00 p.m. to 9:00 p.m. (open to the public)*

Refinements were made to the alternatives as a result of public comments. The comments received during scoping meetings are provided in Appendix G of this Final EIS.

After completion of screening in the winter of 2006, 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 identified a fixed guideway transit system extending from Kapolei to UH Manoa with a connection to Waikiki as the Locally Preferred Alternative. This identification, which eliminated the TSM and Managed Lane Alternatives from further consideration, became Ordinance 07-001 on January 6, 2007. The NEPA process considered a range of alternatives that was consistent with the identified Locally Preferred Alternative. As discussed in Section 2.2, there were no alternatives that had not been previously studied and eliminated for good cause that would satisfy the Purpose and Need at less cost, with greater effectiveness, or less environmental or community impact.

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~~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 included the opportunity for public comment and was used in parallel with the alternatives 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. An independent five-member technology panel composed of four transit experts and a transportation academic appointed by the City Council evaluated guided rubber-tire-on-concrete systems (e.g., Phileas bus system and VAL-type systems), monorail (which is a variation on rubber-tyred technology), steel-wheel-on-steel-rail systems, (e.g., light rail and rapid rail), and magnetic levitation (MAGLEV). The panel considered the performance, cost, and reliability of the proposed technologies.

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 panel accepted public comment twice as part of its review. By a four-to-one vote, the panel chose a steel wheel vehicle operating on steel rail system because it was considered safe, reliable, economical, and non-proprietary. Those results are documented in the panel's report to the City Council dated February 22, 2008 entitled "Independent Technology Selection Panel Report".

~~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 a five-member panel appointed by the City Council that considered the performance, cost, and reliability of the proposed technologies. The panel, comprised of transit experts and a transportation academic, 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 proven, 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. 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.~~

Comments on Chapter 4 of the Draft EIS: Environmental Analysis, Consequences, and Mitigation

Regarding construction delays, FTA and the City have developed a Programmatic Agreement in consultation with the State Historic Preservation Division and other consulting parties to address any affected ~~iwi kupuna (~~Native Hawaiian burials~~)~~ or other historical or archaeological resources. The Programmatic Agreement is included in Appendix H to the Final EIS. The Project may be subject to compliance with the *Native American Graves Protection and Repatriation Act* (NAGPRA) (25 USC 3001) where it crosses lands controlled or owned by the Federal Government. Any human remains found on lands owned or controlled by the Federal government will be addressed in accordance with NAGPRA and 43 CFR 10—the regulations that define the process and procedures of NAGPRA.

The Programmatic Agreement (PA) requires the completion of archaeological inventory surveys prior to construction of Project elements. During the archaeological survey, any Native Hawaiian burials that are identified will be managed in compliance with applicable laws. This will include consultation with project proponents, the Oahu Island Burial Council, SHPD, and recognized lineal and/or cultural descendants to develop burial treatment plans. Although the goal of the archaeological sampling will be to identify all burials and treat them appropriately prior to the start of construction in a particular area, the possibility exists that additional previously undiscovered burials will be encountered during construction. In addition, protection zones ~~would~~ will be created around resources that are identified prior to construction. The PA stipulates that the treatment of burials discovered during construction will follow ~~It includes surveys to locate and address any iwi kupuna issues in advance of Project construction. S~~state law, which includes ~~provides procedures and~~ a timeline to address inadvertent discoveries of burials during construction~~, which would~~and to avoid substantial project delays. ~~Section 4.18.11 of the Final EIS provides more detail on potential for discovery of burials during construction.~~

The Project is a Fixed Guideway Transit system. The system will use steel-wheel-on-steel-rail technology. Current versions of steel wheel on steel rail technology are quieter than a bus at the same distance. Noise and vibration effects from the Project were evaluated following FTA guidance and are detailed in Section 4.10 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 committed mitigation in place (sound absorbing material and wheel skirts), the noise analysis indicates that the new noise generated by the Project will be lower than the existing noise levels in most places. 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.

As committed to in the Final EIS, ~~Wheel~~ 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 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.

The island's unique visual character and scenic beauty was considered in the visual and aesthetic analysis presented in the Draft and Final EISs. As discussed in Section 4.8 of the Final EIS, the Project will be set in an urban context where visual change is expected and differences in scales of structures are typical. The following measures will be included with the Project to minimize negative visual effects and enhance the visual and aesthetic opportunities that it creates:

- *Develop and apply design guidelines that will establish a consistent design framework for the Project with consideration of local context.*
- *Coordinate the project design with the City transit-oriented development program within the Department of Planning and Permitting.*
- *Consult with the communities surrounding each station for input on station design elements.*
- *Consider specific sites for landscaping and trees during the final design phase when plans for new plantings will be prepared by a landscape architect. Landscape and streetscape improvements will serve to mitigate potential visual impacts.*

It should also be noted that the Project will provide users, including tourists, with expansive views from several portions of the corridor by elevating riders above highway traffic, street trees, and low structures adjacent to the alignment. In Section 4.8.3 of the Final EIS under the heading Design Principals and Mitigation, specific environmental, architecture and landscape design criteria are listed that will help minimize visual effects of the Project.

The fact that this will be the only island with high-capacity transit, with an efficient airport connector, may in fact attract more tourists who value the convenience, potential cost savings, and decreased travel time between various tourist destination spots along the Project's alignment.

Rail, as a technology, predates the automobile by a few years. It is a well-established technology with a long track-record of good performance and continued technological development. The rail options considered for Honolulu are modern, quiet systems that are more fuel efficient per passenger than the automobile and which can easily carry large volumes of people. Please refer to the discussion on the technology selection process that was discussed earlier in this response.

Ridership forecasts are over 116,000 per day in 2030 as noted in Chapter 3 of the Final EIS. The Project's financial plan described in Chapter 6 of the Final EIS includes ongoing operation and maintenance funding for the Project. One of the factors cited in the selection of steel wheel technology was standardization, so that replacement vehicles and other system elements would be available from multiple sources. Stations will accommodate an attendant to

help prevent the types of vandalism and nuisances described in your comment. Section 2.5.4 of the Final EIS describes security measures that will be implemented with the Project.

Table 3-14 of the Final EIS shows that implementation of the fixed guideway alternative is forecast to result in an 18-percent decrease in traffic delay and congestion compared to the No Build Alternative or the other alternatives that do not include a fixed guideway system. The local and federal New Starts funds anticipated to be used for constructing the Project are available only for the specific purpose of building a fixed guideway system. They cannot be used for sewer, solid waste, or highway projects. Chapter 6 of the Final EIS contains a detailed discussion of the financial analysis prepared for the Project and the availability of the proposed funding sources for the Project.

Comments on Chapter 8 of the Draft EIS: Comments and Coordination

The overall public information program has been continuous since the beginning of the Project in 2005 and has met the requirements of SAFETEA-LU Section 6002. The Alternatives Analysis phase evaluated a range of transit mode and general alignment alternatives in terms of their costs, benefits, and impacts. During the fall of 2005 and winter of 2006, the City and County of Honolulu completed the alternatives screening process that is documented in the Honolulu High-Capacity Transit Corridor Project Alternatives Screening Memorandum. As detailed in Chapter 8 of the Final EIS, scoping meetings were held, which included a presentation of alternatives to the public and interested agencies and officials to receive comments on the Purpose and Need, alternatives, and scope of the analysis for the Alternatives Analysis. Refinements were made to alternatives based on the public input during scoping.

Guidelines set forth by NEPA, as amended, and Chapter 343 of the Hawaii Revised Statutes stipulate that public involvement be carried out on large-scale projects such as the rail project. As a large infrastructure project, the City felt it was important to disseminate information to as many people as possible. Thus, a broad range of print and visual media and community outreach were necessary to reach different population segments. Project funds were used for the public involvement activities listed in Chapter 8 of the Final EIS as required by NEPA. In addition, all testimony and comments received during the public hearings will be answered and a written or electronic letter will be sent when the Final EIS is issued. Questions and comments have been taken and addressed from all members of the public. Information presented about the Project in public presentations has been reviewed to ensure that information presented is accurate. All individuals have been provided equal opportunity to express their opinions within an established time limit. Dates and times for meetings and discussions held under the public involvement process are presented in Chapter 8 of the Final EIS.

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