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May 21, 2010 RT2/09-299154R

Mr. Thomas Jivorsky
CBRE Consulting, Inc.
355 South Grand Avenue, Suite 1200
Los Angeles, California 90071-1549

Dear Mr. Jivorsky:

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:

All property owners adjacent to the Project have been notified and asked to participate in the environmental process. The discussion of direct impacts to property owners along the alignment that are not subject to acquisition or relocation were presented in the following sections of Chapter 4 in the Final EIS: Section 4.5, Community Services and Facilities; Section 4.6, Neighborhoods; Section 4.10, Noise and Vibration; and Section 4.16, Archaeological, Cultural, and Historic Resources. Other indirect and cumulative impacts along

the route and at each station area are presented in Section 4.19. In the Final EIS, mitigation measures have been expanded upon in many sections. Section 4.1 of the Final EIS lists all the sections in that chapter that have been updated since publication of the Draft EIS.

Your additional comments regarding case study research on other major North American transit systems have also been noted.

Regarding your suggested construction mitigation options, the Project will continue its public involvement and education program throughout construction. Project representatives will work with businesses that will be affected by construction, as well as ensure that businesses and the general public are fully informed of current and upcoming construction activities. However, it is up to individual businesses to inform their customers of their operating hours during construction. As stated in Section 4.18 of the Final EIS, mitigation to reduce adverse economic hardships for existing businesses along the project alignment during construction will include the following:

- *Maintain access to businesses during construction*
- *Develop a public involvement plan prior to construction to inform business owners of the construction schedule and activities*
- *Initiate public information campaigns to reassure people that businesses are open during construction and to encourage their continued patronage*
- *Minimize the extent and number of businesses, jobs, and access affected during construction*
- *To the extent practicable, coordinate the timing of temporary facility closures to minimize effects to business activities—especially those related to seasonal or high sales periods*
- *Minimize, as practical, the duration of modified or lost access to businesses*
- *Provide signage, lighting, or other information to indicate that businesses are open*
- *Provide public information (e.g., press releases or newsletters) regarding construction activities and ongoing business activities, including advertisements in print and on television and radio*
- *Phase construction in each area so as to maintain access to individual businesses for pedestrians, bicyclists, passenger vehicles, and trucks during business hours and important business seasons*
- *Provide advance notice if utilities will be disrupted and schedule major utility shut-offs during non-business hours*

In addition, Section 4.18.3 and 4.18.5 discuss mitigation measures for visual and aesthetic and noise and vibration effects during construction. These measures will include:

- *Removing visibly obtrusive erosion-control devices, such as silt fences, plastic ground cover, and straw bales, as soon as an area is stabilized*

- *Locating stockpile areas in less visibly sensitive areas whenever possible so they are not visible from the road or to residents and businesses*
- *Shielding temporary lighting and direct it downward to the extent possible*
- *Limiting the times construction lighting could be used in residential areas*
- *Replacing removed street trees and other vegetation with appropriately sized vegetation as soon as practical after construction is completed in the same location or another location in accordance with City and State requirements*
- *Developing a monitoring plan with noise limits • Construct temporary noise barriers or curtains*
- *Equipping construction equipment engines with adequate mufflers and intake silencers*
- *Strategically placing stationary equipment, such as compressors and generators*

The City will not provide financial assistance or low-interest loans to businesses during construction. Where acquisition of property will occur, compensation will be provided to affected property owners, businesses, or residents in compliance with all applicable Federal and State laws and will follow the Federal Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970.

Construction of the guideway is likely to be sequential, progressing from one block to the next, as shown in Appendix E of the Final EIS. As stated in Section 4.18.1 of the Final EIS, several public involvement strategies will be used to inform businesses and the public about construction activities, including roadway detours. These strategies include those listed in the bullet points above. Part of the mitigation associated with construction will be to regularly remove dirt and debris.

Regarding your post-construction mitigation suggestions, the Project is focused exclusively on the construction and implementation of rail transit service, which is analyzed in the Draft and Final EISs. However, as discussed in Section 4.19.2 of the Final EIS, transit-oriented development (TOD) is expected to occur in station areas as an indirect effect of the Project. The increased mobility and accessibility that the Project will provide will also increase the desirability and value of land near stations, thereby attracting new real estate investment nearby (in the form of TOD). Planning and zoning around station areas will be established and conducted by the City's Department of Planning and Permitting under a process covered by the City's new TOD ordinance (09-4).

To address your concern about the creation of a tunnel effect at stations, center platform stations generally have a greater total shaded area than a side platform station because of the need to widen and split the track structure prior to the station. Center platform stations are proposed where appropriate.

The City is conducting station workshops with communities that will have rail stations. The purpose of the workshops is to engage the public about rail stations and provide

opportunities to residents and businesses to contribute ideas about the appearance of station entryways in their communities. Ideas generated at the workshops will be incorporated into the station planning process. For more information and to become involved in this process, please visit the project website at www.honolulutransit.org.

While there are over 4,100 parking spaces identified as part of the Project, the experience with park-and-ride facilities in Honolulu to date is limited. They have been generally underused. The lots that are part of the Project are located toward the Ewa end of the route and are based on consideration of parking demand using the travel demand forecasting model for the year 2030. Further, the projected mode of access shares were compared to observed data from several Mainland areas, notably San Diego. Given the history of park-and-ride use on the island, it seems prudent to evaluate any need for additional or larger facilities on the basis of empirical experience rather than commit substantial additional funding now. Any need for additional parking at the four stations with park-and-ride facilities would best be determined once experience is gained about their use. As stated in Section 2.5.4 of the Final EIS, security will be provided in the form of surveillance cameras, lighting, fencing, barriers, on-site personnel, or other means. DTS will discuss options with commercial developers interested in integrating additional parking for transit use into their proposed developments.

Where relocations will occur, compensation will be provided to affected property owners, businesses, or residents in compliance with all applicable Federal and State laws and will follow the Federal Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970. It is assumed that for the properties that will be partially acquired, existing land uses will not change.

Regarding security, the majority of the system will be placed in roadway medians, which is not conducive to being used as a shelter. Landscaping and other measures will be used where appropriate to discourage loitering. In addition, as stated in Section 2.5.4 of the Final EIS, security, including cameras, will be provided at all stations and on all trains; however, security personnel may not be physically located in all locations at all times.

During Final Design, detailed investigations will be conducted to reduce the anticipated access impacts to local businesses caused by guideway column placements. Section 3.4.3 of the Final EIS discusses impacts of the Project on the roadway network. Near properties that are owned by Kamehameha Schools, there is no loss of left-turn lanes at signalized intersections (as also shown in Appendix C of the Final EIS). However, restrictions for making left turns in and out of many driveways, including some owned by Kamehameha Schools, are expected due to construction of a raised median along Dillingham Boulevard.

As discussed in Section 4.10.3, to address noise issues, the Project includes an integrated noise-blocking parapet wall that extends three feet above the top of the rail and wheel skirts.

Your comments regarding mitigation improvements for individual property owners and public amenities have been noted; however, public improvements not related to the transit

system are not within the authority of DTS and are outside the Project and beyond the scope of this EIS.

Lastly, the system will operate as a proof-of-payment system, as described in Section 2.5.1 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