HONOLULU HIGH-CAPACITY TRANSIT CORRIDOR PROJECT
63-day Wait Period Comments - Public

Submittal/Document Title: Response to Final EIS Public Comments | **Reviewer:** Judy Aranda | **Date:** October 1, 2010

Comment No.	Date	Comment	Commenter	References	Issue	Issue Previously Addressed	Substantive New Comment?
1	6/21/10 Email #1	1. Reference (a) stated that the Project Construction Phasing will not provide early traffic relief. Reference (a) further provided sites for Vehicle Maintenance and Storage facility for each construction phase to support each construction phase. For example, for the Middle Street to Ala Moana Phase, some 40 acres could be obtained along Lagoon Drive to include portions of Keehi Lagoon, Airport Vacant areas alongside Aolele Street and Lagoon Drive. Another potential site is the undeveloped peninsula between Keehi Lagoon Park and Sand Island Road. (reference (a)) Response: The sites noted in the comment are subject to many restrictions such as Section 4(f) of the Department of Transportation Act of 1966 which protects the features and attributes of parks and recreational facilities from the impacts of transportation projects except when there is no feasible and prudent alternative. This applies to Keehi Lagoon Beach Park, Future Middle Loch Park, Pacific War Memorial Site and the Pearl Harbor Bike Path. Because of the size requirements for a maintenance and storage facility it is likely that there would be impacts to these recreational properties in this area. Sites along Aolele	Ben Ramelb	a. Ramelb letter to DTS 12/29/08 b. DTS response: 6/11/10	Project phasing will not provide early traffic relief. Comment primarily disputes that there are no alternative sites in downtown area for MSF	Yes	No

Comment [eaz1]: Respond to comment that a maintenance and storage facility is not needed for each construction phase.

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		Street and airport vacant areas may be within the airport runway protection zone. The 44 acre preferred site adjacent to Leeward Community College meets the system needs and has the least impact on the natural and built environment as documented in the Final EIS.					
2	6/21/10	2. The City's response, reference (b), states that the "First Phase must be connected to a maintenance and storage facility" and that "No location has been identified closer to downtown with sufficient available land to construct a maintenance and storage facility". Reference (b) makes no mention of the several maintenance and storage sites mentioned by reference (a): namely, Keehi Lagoon Park and vicinity, Aloha Stadium parking lot, a 443 acre vacant site near Leeward Community College and does not state any reason why the Keehi Lagoon potential sites are rejected as viable for a maintenance and storage site. (reference (b) Response: (see wording from comment 1)	**Ben Ramelb**	a. Ramelb letter to DTS 12/29/08 b. DTS response: 6/11/10	Desire for MSF site location near downtown	Yes	No

Comment [eaz2]: Therefore the sites proposed are not reasonable and feasible alternatives

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		The sites noted in the comment are subject to many restrictions such as Section 4(f) of the Department of Transportation Act of 1966 which protects the use of parks and recreational facilities from the impacts of transportation projects except when there is no other alternative. This applies to both Keehi Lagoon Park and Aloha Stadium because a maintenance and storage facility would consume much of the available land and would have significant effects on their use for the originally intended purpose. The 44 acre preferred site adjacent to Leeward Community College is the best location available.					
3	6/21/10	3.The city intends to condemn business property at the airport (along Aolele and Ualena Streets) and family housing sites at Pearl City, yet will not consider condemning open city and state land at Keehi Lagoon and vicinity. Response: (see response to comment 1) The sites noted in the comment are subject to many restrictions such as Section 4(f) of the Department of Transportation Act of 1966 which protects the use of parks and recreational facilities from the impacts of transportation projects except when there	Ben Ramelb		Right-of-way acquisition of businesses near airport.	Yes	No

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			is no other alternative. This applies to both Keehi Lagoon Park and Aloha Stadium because a maintenance and storage facility would consume much of the available land and would have significant effects on their use for the originally intended purpose. The 44 acre preferred site adjacent to Leeward Community College is the best location available.					
4		6/21/10	4. Accordingly, the City's response is incomplete and unacceptable and the Rail project phasing should be revised to include the First Phase of the project to start at Middle Street to Ala Moana Shopping Center instead of from Kapolei to Pearl City. Response: Response to Draft EIS comment is appropriate given the limitations of federal law regarding the cited locations.	**Ben Ramelb**		Project construction should begin in City Center Segment 4	Yes	No
5		7/4/10 Email #2	1. Reference (a) cited that two 3-lane reversible elevated Flyovers, Kamehameha and Nimitz Highway flyovers, would eliminate the traffic bottlenecks at the Middle Street merge, at the H-1/H-2 merge and the p.m. Halawa merge (westbound) at a cost of less than $600 million (80 percent FHWA funded) versus the cost of the $6 Billion rail (80 percent Oahu Taxpayer funded),	**Ben Ramelb**	a. Ramelb letter to DTS 12/29/08 b. DTS response: 6/11/10	Percentage cost share by feds is better for hwy. flyover compared to fixed guideway to deal with H1/H2 bottleneck.	Yes	No

Comment [eaz3]: Check response

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		the rail would NOT eliminate any of the above bottlenecks. Response: As noted in the response to the comments on the Draft EIS, the Nimitz flyover is assumed to be in place in the forecast of future traffic upon which the rail project is based. While it helps, it does not eliminate the traffic bottlenecks referred to in this comment. The flyover also only helps in one part of the corridor while the rail project covers the entire length.					
6	7/4/10 Email #2	2. Paragraphs (d) and (e) of reference (b) states that my suggested 3-lane reversible flyovers in reference (a) will not solve the traffic congestion but does not specify the reasons for why the Flyovers will not eliminate the bottlenecks and why the more expensive Rail is the preferred option. The traffic authorities should note that the 3-lane flyovers will have sufficient traffic capacity cited in reference (a) to eliminate the traffic bottlenecks. Response: As noted in the response to the comments on the Draft EIS, the Nimitz flyover (along with many other roadway projects) is assumed to be in place in the forecast of future traffic upon which the rail project is based. While it helps, it	**Ben Ramelb**	a. Ramelb letter to DTS 12/29/08 b. DTS response: 6/11/10	Need to describe why flyover won't solve bottleneck.	Yes	No

Comment [eaz4]: Provide specific FEIS sections and page numbers where this is mentioned in the document.

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		does not eliminate the traffic bottlenecks referred to in this comment. The flyover also only helps in one part of the corridor while the rail project covers the entire length. The flyover can offer some limited relief, but does not provide for how the traffic will be managed once in the downtown which is and will be very congested. Rail offers an alternative that avoids the entire congested roadway system.					
7	7/4/10 Email #2	3. Since the Kamehameha and Nimitz Flyovers are a more effective and less costly transportation option $600 million x .20 percent = $120 million (Oahu Taxpayer cost) versus the $4 Billion Oahu Taxpayer cost for Rail, The Final Environmental Impact Statement MUST be revised to include the Flyovers as a viable transportation option instead of the $5.3 Billion rail which will exacerbate the vehicular traffic congestion in year 2030. Response: The comment is not based on a thorough analysis and is inconsistent with the intent of the project. It has been thoroughly addressed in the alternatives studied.	**Ben Ramelb**	a. Ramelb letter to DTS 12/29/08 b. DTS response: 6/11/10	Due to lower cost and federal cost share analyze highway flyover proposed by commenter.	Yes	No
8	7/5/10 Email #3	1. The AA-assigned capital cost estimate for the Managed Lane Alternative (Two-lane elevated reversible hwy) is grossly	**Ben Ramelb**	1. Ramelb ltr. to DTS 12/29/08	Capital Cost comparison of managed lane, fixed guideway is incorrect in AA compared to DEIS.	Yes Capital Costs have not changed	No

Comment [eaz5]: Recommend repeating responses in comments 5 and 6

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		incorrect based on several factors: a) The Oahu Regional Transportation Plan shows the State Project No. 52 - 2.2 mile Nimitz two-lane elevated flyover at $250 million (State DOT cost Estimate) or $113 million per mile. b) The 10 mile Tampa three-lane elevated expressway cost $420 million or $42 million per mile. c) The AA assigned cost estimate for the HOT reversible would conclude that the HOT would cost twice as much per lane mile as H-3, the most expensive highway because it had to bore two tunnels through the Koolau mountains. d) Professor Panos Prevedouros study "Transportation Alternative Analysis for Mitigating traffic Congestion between Leeward Oahu and Honolulu" March 2008, shows a cost estimate for a three-lane, 11 mile elevated Managed Lane for $900 million or $81 million per mile. The Managed Lane facility is similar in construction to the Tampa three lane elevated reversible.		2. DTS response ltr. 6/11/10	Discrepancy in per mile cost of Managed Lane alternative shown in FEIS and ORTP, Tampa Bay project, Prevedouros study.	between AA and DEIS or FEIS. It appears commenter is not comparing "apples to apples" in assumptions and comparisons.	

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		e) The city's estimate for the first rail segment which excludes rail stations, from the starting point in East Kapolei to Pearl Highlands in Pearl City, totals 6.5 miles at an estimated construction cost of $550 million to $600 million or 92 million per mile. Response: This was thoroughly responded to in the response to the Draft EIS comments including recognition of the differences between costs in Hawaii compared to other places and the much more comprehensive objectives of the fixed guideway compared to special highway projects that address only segments of the corridor. The AA used the same basis of cost estimate for the managed lane option as it did for the fixed guideway. Other Hawaii costs for the managed lane option have never been substantiated by a credible estimate. As stated in the City Council's Transit Advisory Task Force Report, a committee was charged with reviewing cost estimates for the two alternatives involving construction (the Managed Lane Alternative and Fixed Guideway Alternative) in the Alternatives Analysis. The report states that "the Task Force agrees with this committee that the Alternatives Analysis' construction cost					

Comment [eaz6]: Is this publically available. Cite where this is available (just the first time is referenced in these comment responses)

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		estimates were fairly and consistently prepared, and that they may be used for both planning and cost comparisons."					
9	7/5/10 Email #3	2. Reference (b), paragraph a) continues to insist that the cost for the Managed Lane Alternative is still $327 million to $427 million per mile. Ref. (b) also ignores the fact that a three-lane elevated reversible highway is normally funded 80 percent by the FHWA while the Rail is funded only 20 percent with the rest being paid by the Oahu Taxpayer. Response: See previous response. While there is a possibility, there is no guarantee that federal funding would be available for the Nimitz flyover or, if it is, what percentage it might cover. Funding is subject to a competitive process.	**Ben Ramelb**	1. Ramelb ltr. to DTS 12/29/08 2. DTS response ltr. 6/11/10	1. Cost of Managed Lane Alternative 2. Feds cost share differs between highway and rail projects	Yes	No
10	7/5/10 Email #3	3. It is concluded that the AA-assigned capital cost estimate for the HOT reversible at $327 Million to $427 million per mile is grossly incorrect and that a three-lane reversible MLA is estimated to cost not more than $80 million per mile or $880 million for 11 miles from the H-1/H-2 merge to downtown Hotel Street. Response: This was thoroughly responded to in the response to the Draft	**Ben Ramelb**	1. Ramelb ltr. to DTS 12/29/08 2. DTS response ltr. 6/11/10	HOT and Managed Lane capital cost is incorrect in AA.	Yes	No

Comment [eaz7]: Provide specific number.

Comment [eaz8]: Is this true for FHWA funding? Or are you talking about the local decision-making process for determining how FHWA formula money is spent.

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		EIS comments including recognition of the differences between costs in Hawaii compared to other places and the much more comprehensive objectives of the fixed guideway compared to special highway projects that address only segments of the corridor. The AA used the same basis of cost estimate for the managed lane option as it did for the fixed guideway. Other Hawaii costs for the managed lane option have never been substantiated by a credible estimate.					
11	7/5/10 Email #3	1..It is recommended that the DEIS be revised to show a lower cost for the Managed Lane Alternative (Elevated three-Lane reversible), including Table 2-1, as depicted in www.eng.hawaii.edu/~panos/UHCS.pdf. and that the MLA be reinstated into the DEIS for consideration as a viable Mass Transit Alternative. Response: This was thoroughly responded to in the response to the Draft EIS comments including recognition of the differences between costs in Hawaii compared to other places and the much more comprehensive objectives of the fixed guideway compared to special highway projects that address only segments of the corridor. The AA used the same basis of cost estimate for the	**Ben Ramelb**		Show lower cost for Managed Lanes alternative and consider as viable alternative.	Yes	No

Comment [eaz9]: Provide page numbers or comment numbers or repeat the responses.

Comment [eaz10]: Such as?

Field Code Changed

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		managed lane option as it did for the fixed guideway. Other Hawaii costs for the managed lane option have never been substantiated by a credible estimate.					
12	7/7/10 Email #4	1. Attachment (1) stated that the City's Alternative Analysis and DEIS failed to provide "… an assessment of a wide range of public transportation alternatives …" and/or "… sufficient information to enable the Secretary to make the findings of project justification …" as required by statute. Four alternatives should be assessed and be included in the DEIS as mentioned in Attachment (1): a) BRT transit system as proposed by the Harris Administration. The BRT route downtown should be limited to King and Beretania Streets (a couplet) and exclude Dillingham Blvd and Kapiolani Blvd which do not have sufficient lanes to accommodate BRT. b) Managed Lane (reversible three lanes) as proposed by Professor Panos Prevedouros Study, "Transportation Alternatives Analysis for Mitigating Traffic Congestion between Leeward Oahu and Honolulu" which shows the 11 mile three-lane cost estimate to be $900	**Ben Ramelb**	1. Ramelb ltr. to DTS 12/29/08. 2. Description of Kamehameha HOV Flyover & Nimitz Flyover 3. DTS response ltr. 6/11/10	Adequacy of AA alternatives studied; unacceptable response to comment	Yes	No

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		million which is in line with the $320 million Tampa three-lane reversible transit way. c) Former mayoral candidate Ann Kobayashi's proposal for a 15 mile EzWay. d) Build two elevated highway bypasses around the H-1 bottlenecks at H-1/H-2 merge and at Middle St. merge. The bypasses include: (a) "Kamehameha HOV Flyover", a four-mile, three-lane reversible elevated hwy over the Kamehameha Hwy median between the H-1/H-2 merge and the H-1 Viaduct east of Aloha Stadium and (b) "Nimitz Flyover", a three- mile, three-lane reversible elevated hwy over the Nimitz Hwy median between the H-1 Viaduct at Keehi Lagoon Drive and Hotel St/Alakea St./ Halekauwila St/Ala Moana Blvd. An on/off ramp to Waikamilo Rd from the Nimitz bypass would reduce the number of lanes from three to two between Waikamilo Rd and Iwilei Response: Chapter 2 of the Final EIS addresses the alternatives evaluated at various stages of the project and why the alternatives addressed in the EIS were selected. Other alternatives had already					

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		been studied or were substantially the same as those already studied, as noted in Chapter 2.					
13	7/7/10 Email #4	1..The City's reply to alternatives listed on Attachment (1) is unresponsive as the reply does not cite reasons why each of the alternatives are unacceptable for inclusion in the DEIS. Accordingly, the DEIS/FEIS should be revised to include the four alternatives cited on Attachment (1). Response: Chapter 2 of the Final EIS addresses the alternatives evaluated at various stages of the project and why the alternatives addressed in the EIS were selected. Other alternatives had already been studied or were substantially the same as those already studied, as noted in Chapter 2.	**Ben Ramelb**	1. Ramelb ltr. to DTS 12/29/08. 2. Description of Kamehameha HOV Flyover & Nimitz Flyover 3. DTS response ltr. 6/11/10	Unresponsive reply to why commenter's alternatives shouldn't be included in DEIS.	Yes.	No
14	7/12/10	1..Why are there 3 stations between Aloha Tower and Ala Moana Center? Response: There are four stations between Aloha Tower and Ala Moana Center. They are located on Nimitz Highway at Alakea Street, on Halekauwila Street at South Street, at Halekauwila Street at Ward Avenue and on Kona Street at Kona Iki Street. Based on the analysis of travel demand, these locations have high ridership and serve	**Raymond A. Apana**		Question on the number of stations.	Yes	No

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		significant existing and future activity centers.					
15	7/7/10	2..I thought federal security didn't want the rail to pass the Federal Bldg. on Ala Moana Blvd Response: The City has worked with GSA, DOE and the US Marshals to identify security improvements that address the concerns noted at the time of the Draft EIS.	**Raymond A. Apana**		Security issue at federal bldg.	Yes	No
16		3. Why does the rail have to go all the way to Ala Moana Shopping Center when it already passes Pearl Ridge Shopping area? Response: Ala Moana is not only a shopping destination, but a major employment and residential destination as well. It is the most heavily used station in the system as shown in Chapter 3 of the Final EIS.	**Raymond A. Apana**		Non-relevant	No	No
17	7/7/10	4. Is it going to upset traffic going to Kakaako and Ala Moana Beach Park area? Response: The rail system will be elevated along Halekauwila, Queen and Kona Streets and should have minimal effect on street traffic to and from the Kakaako and Ala Moana Beach Park	**Raymond A. Apana**		Traffic impact in Segment 4	Yes	No

Comment [eaz11]: Page or section number?

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		areas.					
18	7/7/10	5. Governor Lingle wants it (guideway) on the ground and wants a flyover from Nimitz (Keehi Interchange) to Iwilei. I think it's a good idea, only keep 2-story freeway all the way to Aloha Tower and turn Hawn Electric terminal into main rail terminal and where the freeway ends and the down ramp fees straight into Ala Moana Blvd. helping people working the Ala Moana and Waikiki Area. Response: The reasons for the elevated guideway option and why it works better than the at-grade option are discussed in the Final EIS in Section 8.6.13. The Nimitz Flyover is included in the assumptions that led to the selection of the fixed guideway as the preferred alternative in the EIS. Other roadway concepts indicated in the comment do not address the purpose and need of the project and provide limited benefit with the 20-mile corridor.	**Raymond A. Apana**		Suggested modification to proposed Project	Yes	No
19	7/7/10	6. If the two story freeway connects from Keehi to Aloha Tower, the rail tracks can run along side from Kapolei on the H 1 all the way to the Aloha Tower cantilevered or supported next to it. The track running from Kapolei to Aloha Tower on the makai side of the freeway and the Aloha Tower track to Kapolei on	**Raymond A. Apana**		Suggested design modification to proposed Project	No	No

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		the Mauka side. This would be good to help with traffic at the stadium doing the football season with a stop at the mauka side to the stadium. Response: While this alternative was not specifically studied as described and was not proposed during EIS scoping period in 2007, the components of it were part of the Alternatives Analysis, though rail and highway options were evaluated separately. This combined alternative would have major impacts within the corridor and would be cost-prohibitive given the major structures required to carry both roadways and rail. The alternatives for individual modes face funding challenges that would be exacerbated by combining them.					
20	7/7/10	7..With the tracks following the freeway, the businesses at Aolele and Ualena don't have to not to mention businesses and private to be condemned at a lot of cost, not to mention moving runway #4 at the airport. Of course part of Nimitz would be involved and an off ramp at Waiakamilo for the Young Bros shippers, Costco, Home Depot, Best Buy and pretty soon Loews. Sand Island off ramp helps H1 to continue, Sand Island, and Dillingham. Nothing is more ugly and	**Raymond A. Apana**		Avoidance of ROW and airport impacts and costs using flyover from Nimitz (Keehi Interchange) to Iwilei instead of proposed Project design.	No	No

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		costly than a free standing. Response: Access is very difficult along the freeway. Both buses and people have difficulty getting into and out of the stations as well as to and from their destinations if the rail line is within the freeway corridor. The rail line and transit in general works best when it can be readily accessed from adjacent land uses or bus service.					
21	7/7/10	8..Talk about cost, why must the stations be so elaborate? Response: Stations, which are subject to a public workshop design process to help define the critical elements that will tie them to the local neighborhoods, are being reviewed to ensure they are well designed and cost-effective.	**Raymond A. Apana** 1246 Mona St.		High cost of stations	No	No
22	7/7/10	9..Why not platforms with railing same height of the tracks? Response: The platforms and vehicle doors are being designed to be at one level to permit easy access to all, including wheel chair-bound riders.	**Raymond A. Apana**		Height of platforms and tracks (comment is unclear)	No	No
23	7/7/10	10..The stairs or escalator or elevators could go to a waiting room below the platform to shield from the wind, rain and sun. When the rail is coming that is	**Raymond A. Apana**		Design modification suggested to reduce costs	No	No

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		showing on the tv below, just go up to the platform. Response: Some stations will have a concourse below the boarding platforms. All stations will have a cover at the platform level that provides shade and protects riders from precipitation. They will also have walls to protect from the wind yet still be open for natural ventilation. Allowing natural ventilation will help keep station costs down.					
24	7/7/10	11..The displaced Hawn Electric facility should be moved to the back end of Kalihi Valley to generate enough power for East Oahu to Waikik to Kaimuki to Manoa to downtown to airport. Let Waiau and Kahei take care of the windward, northshore, Waianae coast, and West Oahu. Response: Comment noted. The energy production plan for Oahu is beyond the scope of this FEIS.	**Raymond A. Apana**		Suggestion to reduce energy cost and increase energy production	Issue not relevant to Project	No
25	7/14/10	Why doesn't the Final EIS address the Ho'opili residential rezoning that was denied by the state and federal government? Response: The EIS was complete by the time the decision by the Land Use	**Anthony Scarpelli**		Rezoning of Ho'opili development proposal	Issue not relevant to FEIS	No

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		Commission was made. The denial so far is about how the project should be phased and could be presented again in the future. The project assumes there will be development in the Ho'opili area.					
26	7/14/10	Why wasn't the O'ahu Railway & Land (OR&L) Co route discussed in the draft and final EIS? Response: It was evaluated early in the Alternatives Analysis phase and found to be inadequate for the Purpose and Need of the project. Much of the alignment is along the water which only allows single side access and the right-of-way is very narrow and even non-existent in places. Part of the OR&L route from is on the National Register of Historic Places. As a result, this right-of-way could not be used for the transit system until it is removed from the list, which is a lengthy and potentially costly process. Additionally, the OR&L route travels through the Ewa historic district, which has many restrictions about what can be built or developed there. Section 4(f) also protects historic sites of National, State, or Local significance located on public or private land. These are commonly referred to as Section 4(f) properties. Federal regulations that	**Anthony Scarpelli**		Use of OR&L alignment instead of Project alignment	Yes	No

Comment [eaz12]: This is an incorrect statement. There are federal projects located on railroad corridors eligible for the national register of historic places all over the country. It does not take removing a corridor from the National Register of Historic Places to use that property for a transportation project.

Section 106 and Section 4(f) give specific consideration and protection to these resources. However, if undergoing an analysis of all feasible and prudent alternatives and all possible planning measures to minimize harm, FTA can determine to have a use of a 4(f) historic property for a transportation project. In the Honolulu project, there are feasible and prudent transportation alternatives (i.e. the proposed action)

Alternatively, the project could be designed in such a way that there would be a no adverse effect determination to the transportation project. Or the alternative could be considered in a least harm analysis.

Also, the proposed Honolulu transit project adversely affects two other historic districts in Honolulu. It is not a sufficient response to say that the alternative could not be considered because it adversely affects the Ewa historic district.

Need to develop a revised response for this comment.

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		implement Section 4(f) are found in 23 CFR 774. FTA may not approve the use of a Section 4(f) property, as defined in 23 CFR 774.17, unless it determines the following: • There is no feasible and prudent avoidance alternative, as defined in Section 774.17, to the use of land from the property. • The action includes all possible planning, as defined in Section 774.17, to minimize harm to the property resulting from such use.					
27	7/14/10	What is the real cost of the rail? Response: $5.5 billion to build in year of expenditure dollars. The project will cost $77 million a year to operate and maintain in 2009 dollars.	**Anthony Scarpelli**		Inadequacy of Chapter 6; project costs; use of bus federal funds; source of funds	Yes	No
28	7/14/10	Where Is the main terminal building going to be located so when future rail segments are added to the current route, passengers will be able to transfer seamlessly from one train to the next? Response: The termini of the current project are at Ala Moana Center and at	**Anthony Scarpelli**		What is the location of the main terminal building?	No	No

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		East Kapolei on Kualaka'i Parkway near the future UH West Oahu campus and across from the proposed Kroc Community Center.					
29	7/14/10	There is no discussion about using the rail system as an alternative for moving Items from the Kalaeloa Harbor to downtown. If a terminal building was built downtown or at Ala Moana Shopping Center, this would allow the rail system to serve a dual purpose. During the day as a passenger mover, and between 9 PM to 12PM, the rail could serve as a mover of goods to and from downtown to Kalaeloa Harbor. This would provide another source of income to reduce the cost of the rail system. Response: This is an option that can be studied. A future project, subject to additional funding, but approved as part of the locally preferred alternative extends into Kalaeloa near the harbor. But it is not part of the current project.	**Anthony Scarpelli**		Use of guideway to transport freight goods from Kalaeola Harbor to downtown.	No	No
30	7/14/10	The EIS does not address how many jobs will be created because of the rail during construction, operational, and maintenance phases of the rail project. Therefore there is no way to properly set the budget for the rail project. The EIS should state how many personnel will be required to support the different phases of	**Anthony Scarpelli**		Wants information on number of jobs to appropriately establish budget for rail project.	Yes	No

Comment [eaz13]: This did not respond to the comment/question. The question, I believe, is getting at whether there would be multiple intersecting transit lines.

Comment [eaz14]: Is using the rail system for freight transport part of the purpose and need of the project? That would be another explanation on why that alternative was not considered.

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		the rail project. Mayor Mufi Hanneman states the rail will generate17,000 jobs. UH- Manoa states the highest number of jobs will be 4,000. Response: The analysis completed for the EIS shows that the project will generate about 10,000 jobs a year on average. This is discussed in the Final EIS in Chapter 4, Section 4.18.1. This is consistent with the experience on similar projects on the Mainland.					
31	7/14/10	The city did not get an objective and unbiased budget. The city outsourced the rail budget process to Parsons Brinkerhoff. For the last 20 years, Parsons Brinckerhoff has done all of the rail studies in Honolulu. This time around Parsons Brinckerhoff helps Mayor Hannemann misrepresent the system by calling it Light Rail' when in reality they are designing a fully elevated Heavy Rail system. Another correct term for it is Rapid Transit. Light Rail is a modem tramway that operates at grade or on street lanes. None of this is true for the Mayor Hannemann rail. Cheryl Soon, director of the city's Department of Transportation Services during Mayor Harris's administration said the following in 2000 based on Parsons	**Anthony Scarpelli**		Terms used to describe technology is inappropriate	No	No

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		Brinckerhoff study recommendations on the same corridor that Mayor Hannemann proposes rail today: The light rail transit altemative was dropped because subsequent analyses revealed that Bus Rapid Transit could accomplish virtually all of the objectives of light rail transit at substantially less cost. Response: The City awards projects on a competitive basis following a request for qualifications or proposals. The name of the type of system being built is not a critical consideration. There is no clear definition of heavy vs. light rail and for purposes of this project, we have used the term "light metro". It is, as the comment suggests, a third rail system which is typical of "heavy rail" in other places, but it will use smaller vehicles more consistent with a "light rail" description. The comment made by Ms. Soon was for a different project that was designed to be at-grade because of limited funding.					
32	7/14/10	I am reprinting excerpts from an April 23 letter to Honolulu Councilmember Ann Kobayashi from Honolulu Attorney John C. Mclaren who wrote 'on behalf of former Governor Ben Cayetano and other unidentified people "according to the May 6 Advertiser as Attachment (1) to this letter. Kobayashi and Cayetano are	**Anthony Scarpelli**		Why should the project be trusted by consultant who has ties with Mayor and Council?	No	N/A

Comment [eaz15]: Expand further to say why that option would not work now or link to analysis already conducted that would show that. AA?

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		key supporters of Neil Abercrombie. This shows that Parsons Brlnckerhoff do not represent the best Interest of the O'ahu people when it comes to presenting the facts about the rail. I would like to know why the EIS should be trusted since the budget process is questionable and so are the ties of the Mayor and Honolulu City Council to Parsons Brlnckerhoff. The allegations contained in the letter have been forwarded to the State procurement office for Investigation. Response: Since the this matter has been forwarded to the Procurement Office, it will be addressed in that process.					
33	7/18/10	I am writing to comment on the two essentially identical letters sent to AIA Honolulu from the Department of Transportation Services (DTS), City and County of Honolulu, on June 11 and June 16, 2010. The responses contained in both these letters are unfortunately very inadequate in addressing the specific issues raised by our organization. We submitted both a letter and a detailed report on December 8, 2008 and February 3, 2009 in response to the Draft Environmental Impact Statement on this project and pursuant to the release of the FEIS.	**Spencer Leineweber**, FAIA President-elect **AIA Honolulu Chapter**		Inadequate response to AIA's DEIS comments	No	No

Comment [eaz16]: Need to discuss whether to have a more developed response.

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		Response: A letter was sent to the AIA as a commenter on the Draft EIS as provided for in Hawaii Revised Statutes Chapter 343 and another was sent as part of the distribution required by NEPA prior to the Notice of Availability.					
34	7/28/10	The comments we recently received in response are generalized and superficial answers that bear limited relationship to the actual concerns raised. We continue to have serious questions about urban design issues and visual impacts on the surrounding neighborhoods impacted by the proposed transit, and to the lack of adequacy in providing thorough and current analysis and review of identified alternatives. Response: The alternatives were discussed thoroughly in Chapter 2 and 8 of the Final EIS and so noted in the response to AIA.	**Spencer Leineweber**, FAIA President-elect **AIA Honolulu Chapter**		1. Inadequate response to DEIS comments. 2. Concerns on urban design issues and visual impacts. 3. Inadequate analysis of alternatives.	Yes	No
35	7/18/10	Mauka to makai views: The FEIS addresses makai and mauka views in a very general sense when in fact existing legislation protects specific mauka to makai views in the Chinatown District due to its historic character, and protects specific views in both directions along certain corridors in the Capital District. Response: Special District Regulations in	**Spencer Leineweber**, FAIA President-elect **AIA Honolulu Chapter**		Protection of views under existing legislation not followed – esp. Chinatown & Capital District.	Yes	No

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		Chapter 21 of the Revised Ordinances of Honolulu include policies that safeguard special features and characteristics of particular districts to allow for their preservation and enhancement, including Chinatown and Hawaii Capitol District. The Final EIS evaluated the visual effects of the Project on protected mauka-makai views within the corridor that are protected under City land use regulations.					
36	7/18/10	The proposed all-elevated alternative is in violation of Honolulu City & County Land Use Ordinance Chapter 21. In the Chinatown Special District, Section 21-9.60-3 protects prominent makai view corridors at Maunakea Street and Nuuanu Avenue. This visual connection between Honolulu Harbor and the heart of Chinatown reflects the historic ties between the two areas. Response: As stated in the FEIS, the Project will not substantially impair the physical connection to the waterfront. The Project will be a dominant visual element that contrasts in scale with the pedestrian environment and substantially changes makai views of Honolulu Harbor from Chinatown. The Project is consistent with the goals	**Spencer Leineweber**, FAIA President-elect **AIA Honolulu Chapter**		Elevated rail project violates City Land Use Ordinance.	No	Yes

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		and objectives of the City and County Development Plans. Chapter 21the City's land use ordinance includes the process for development approval within special districts.					
37		In the Capital Special District, Section 21-9.30-3 protects both mauka and makai views along Ala Moana Boulevard between Punchbowl Street and the Capital District boundary, along Mililani Street and Mall between Halekauwila Street and King Street, along Punchbowl Street between Beretania Street and Ala Moana Boulevard and South Street between King and Pohukaina Streets. Response: This area was analyzed for view protection as was the entire corridor.	**Spencer Leineweber**, FAIA President-elect **AIA Honolulu Chapter**		View impacts in Capital Special District	Yes	No
38		The proposed elevated rail system will cross the view planes protected by legislation. The stations, columns, and elevated rail bed will continuously block these views. Issuance of a Record of Decision (ROD) should not be made until such time as identified alternatives have been fully reviewed and analyzed. The all-elevated system proposed in the FEIS is not in compliance with existing law. Placing anything continuously in these view corridors is in violation of Honolulu	**Spencer Leineweber**, FAIA President-elect **AIA Honolulu Chapter**		Elevated rail will cross view planes protected by legislation	Yes	No

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		City & County Ordinances. Response: The interpretation of the "legislation" is inconsistent with its intent. Alternatives were evaluated that have differing levels of effect on views.					
39		AIA Honolulu strongly believes that we must implement a plan that protects the mauka-makai view corridors that are outlined by the City & County of Honolulu in its own Primary Urban Center Development Plan and its Land Use Ordinance. Response: The City and County Department of Planning and Permitting are responsible for implementing and enforcing the City's land use ordinance. DPP is also responsible for developing plans.	**Spencer Leineweber**, FAIA President-elect **AIA Honolulu Chapter**		Must protect mauka-makai views.	Yes	No
40		Section 106 and 4f: The FEIS does not include the Programmatic Agreement to resolve negative impacts to the 33 historic sites impacted by this federal action. The AIA Honolulu has spent many hours as participant in the formal Section 106 consultation process. We have had no communication concerning this agreement since the meetings ended without resolution in October 2009. This is an inadequate action and does not comply with the provisions of the	**Spencer Leineweber**, FAIA President-elect **AIA Honolulu Chapter**		No communication with AIA on status of Programmatic Agreement since October 2009	Yes. FTA sent email in April 30, 2010 providing update and PA status; update in Sept. 2010	No PA will be executed in ROD

Comment [eaz17]: Reference where these alternatives were evaluated.

Comment [eaz19]: Executed before the ROD.

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		Historic Preservation legislation. Response: The Final EIS includes the draft of the Programmatic Agreement and does indicate the approach to be taken to resolve adverse impacts on historic properties as they were discussed by the consulting parties until November 2009. The City had not been a part of discussions of the signatory parties between November and May. The approach taken by the FTA upon the release of the Final EIS recognizes that a Record of Decision will not be issued without an executed version of the Programmatic Agreement.					
41		Alternatives Study: The FEIS does not adequately address all alternatives. AIA Honolulu continues to propose a more flexible rail transit system. Light Rail is capable of running at, below or above grade to accommodate the particular conditions in each community. A complete evaluation of this flexible alternative was not undertaken. Response: The Final EIS covers the at-grade option and its limitations in any part of the corridor thoroughly in Chapter 8 and the process by which the alternatives were selected in Chapter 2.	**Spencer Leineweber**, FAIA President-elect **AIA Honolulu Chapter**		LRT alternative proposed by AIA should be re-evaluated given its flexibility.	Yes AA process completed and LRT alternative was rejected	No
42		Light Rail has been selected in 29 of the	**Spencer**		Construction energy cost	Yes	No

Comment [eaz18]: Should also mention that there were update emails from this spring, over the summer, and into the fall to the consulting parties. I am not sure that it is relevant to discuss the City's participation in the responses to comments.

Should also explain that the purpose of any changes from the consulting party meetings to May were to clarify provisions of the PA and to not make major changes. FTA met with the SHPO and ACHP to use their expertise in making these clarifying changes. Changes were made after the SHPO raised comments in the summer.

These (and others) comments should be written from the perspective of both FTA and the City.

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		last 30 American cities for very good reasons; one of these reasons is the total cost benefit of this energy efficient alternative. The FEIS discussed the benefits in energy savings by using rail rather than cars. However, one must also calculate the energy used to build the system. Our calculations indicate that the "payback" will stretch to over fifty years. Response: The conditions upon which other cities' decisions were based are not present in Honolulu. This is discussed in Chapter 8 and in the response to the AIA comments on the Draft EIS. Construction of any transportation system has required energy expenditure. The Final EIS notes there is an impact to build the system. The same is true of highway and other rail options.	**Leineweber**, FAIA President-elect **AIA Honolulu Chapter**		and payback period should be considered in overall project costs analysis.		
43		The unsubstantiated statement in the FEIS (page 2-7) that "excavation to a depth of between 4 and 5 feet would be required for the entire length of the at-grade system to construct track, support"—does not take in to account the actual conditions where at-grade is likely to occur and the experience of other cities that have minimized depth disturbance to 19-24 inches. Response: This issue has been	**Spencer Leineweber**, FAIA President-elect **AIA Honolulu Chapter**		Depth of excavation would not occur if parts of LRT are elevated.	Yes	No

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		thoroughly discussed in Chapter 8 of the Final EIS. The minimal depths alluded to are only for the slab that carries the rails. It does not include the substantial additional depth for the system electrical services and other supporting utilities or utility relocations required.					
44		On page 2-15, the FEIS confuses rail technology terms by creating a new term "Rapid-rail transit (steel wheel on steel rail)". Both Light Rail and Heavy Rail are "Rapid-rail transit (steel wheel on steel rail)" systems, yet this is not indicated in the analysis or importantly in the City and County decision making. The proposed Alternative is a Heavy Rail ("hot" third rail) system. This is a system without flexibility. Heavy Rail can only occur in an elevated or below grade system for safety reasons. Response: The third rail option to be used in Honolulu requires separation, as noted, or transition to another compatible technology that is not exposed.	**Spencer Leineweber**, FAIA President-elect **AIA Honolulu Chapter**		Questions use and application of term "rapid-rail transit" to the Project. System lacks flexibility.	No	No
45		Light Rail was not adequately considered in the FEIS because evaluation assumptions were made that limited evaluation of possible alternatives. The assumption to maintain the status quo of current traffic patterns, lane requirements, and street parking does not allow	**Spencer Leineweber**, FAIA President-elect **AIA Honolulu Chapter**		LRT not adequately considered.	Yes	No

Comment [eaz20]: This does not respond to the comment. See earlier response on terminology.

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		consideration of a full range of more environmentally beneficial systems. Response: The Alternatives Analysis and prior studies considered light rail and found it inappropriate for the Honolulu application. The need to maintain automobile traffic accessibility was not an assumption, but a response to public expectations to increase overall capacity, not just replace it.					
46		AIA Honolulu urges you to withhold a Record of Decision until the FEIS is complete and all alternatives have been adequately addressed. AIA Honolulu encourages the use of social, environment and aesthetic criteria—as well as economic efficiency—in the design of routes and supporting facilities for all transit modes. Transportation system routes and facilities should support land use objectives—including urban growth management and efficient transit mode linkages—and respect significant human, cultural and natural environments Response: The Final EIS addresses the Purpose and Need of the project.	**Spencer Leineweber**, FAIA President-elect **AIA Honolulu Chapter**		Withhold signing ROD and re-evaluate all alternatives using suggested criteria	No	No
47	7/22 Email	Please indicate where in the FEIS your replies to my comments in the DEIS are located. I could not find your responses.	**Amy Kimura**		Wants assistance in locating changes in FEIS due to comments made.	No	No

Comment [eaz21]: This is not an adequate response.

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		Response: Appendix A contains a copy of all letters received on the Draft EIS as well as the responses provided to those letters.					
48	7/22	These comments specifically relate to Servco' s Kakaako property at 609 South Street (TMK: (l) 2-1-031-030): Page 5/Item 3 of your letter states , "The current requirement is for a land area of 20 feet by 200 feet and is not expected to impact existing buildings on the Servco property, as reflected in the Final EIS." In our review of the Final EIS, specifically Figure 2-35 Civic Center Station, the required property for the Project is located behind the existing building. The distance from the property line to the back of the existing building is approximately 8 feet. Therefore, the auto repair facility 'will be affected. Further, Table 4-23 Sites Where Hazardous Materials are Used or Stored that Will be Acquired states: "Auto maintenance building and oil AST in acquisition area." For these reasons, we ask that this be clarified for us. Response: The analysis and design completed to date do not indicate an impact to the Servco operations. Should that change, the project will make the necessary accommodations to make the operations whole based on required	**Carol K. Lam, Servco Pacific Ltd.**		ROW impact to property	Yes ROW negotiations will continue.	No

Comment [eaz22]: Provide a page number.

Comment [eaz23]: More explanation. Is there a better graphic to show why not expecting an impact to servco operations?

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		compliance with the uniform Relocation Act.					
49	7/16/10 Letter	Improper transit noise studies could lead to many families suffering excessive noise inside their homes. There could be class action law suits after the mainland consultants and contractors are gone. The DEIS must address the additional noise impact caused by many homes now using natural ventilation year around with open lanai doors and windows and not the assumption that the 'typical' home has fenestration with standard mainland acoustical performance. Response: The Final EIS shows there is less likelihood of a noise concern from the proposed rail system than there is from the existing street. Section 4.10 of the Final EIS also notes that there will be a noise monitoring program to evaluate noise once the project is in operation and if noise levels are higher than anticipated, additional mitigation may be implemented if the affected owners so desire.	**Ronald Darby,** RAD Engineering, Ltd		Improper noise analysis. Class action lawsuit likely.	Yes	No
50	7/16/10 Letter	After litigation, many hundreds of homes could get the needed new windows and doors to close for reducing traffic and transit noise as well as the needed air-conditioning. Who pays for this and the extra electric bill costs? Who pays the	**Ronald Darby** RAD Engineering, Ltd		Additional noise mitigation may result in additional costs—who pays for this?	Yes	No

Comment [eaz24]: Not specific sections of the EIS.

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		attorneys fees? Response: No significant noise impacts are expected. The Final EIS shows there is less likelihood of a noise concern from the proposed rail system than there is from the existing street. Section 4.10 of the Final EIS also notes that there will be a noise monitoring program to evaluate noise once the project is in operation and if noise levels are higher than anticipated, additional mitigation may be implemented if the affected owners so desire.					
51	7/16/10 Letter	E-2 Was the quality of fenestration in buildings considered since it includes: a) open to closed sliding doors on lanais; b) open jalousies to closed jalousies with window AC units and c) open sliding glass windows to fixed glass windows with central AC.? Response Letter: No significant noise impacts are expected. The Final EIS shows there is less likelihood of a noise concern from the proposed rail system than there is from the existing street. Section 4.10 of the Final EIS also notes that there will be a noise monitoring program to evaluate noise once the project is in operation and if noise levels are higher than anticipated, additional	**Ronald Darby** RAD Engineering, Ltd		How noise analysis was conducted.	Yes	No

Comment [eaz25]: The project team conducted an analysis in accordance with FTA's Noise and Vibration Criteria. No significant noise impacts are expected....

Comment [eaz26]: Could also reference the noise technical report available on the project website.

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		mitigation may be implemented if the affected owners so desire.					
52	7/16/10 Letter	Because of Hawaii's beautiful weather, there are many housing units with "obviously substandard conditions or quality", for example always-open windows and sliding glass doors and many other units which may have leaky jalousies and window air conditioners. "*Standard acoustical performance when closed*" is assumed by FTA to be high quality window and doors with double glazing and quality seals yielding 10 to 15 dBA noise reduction. Thus the noise levels that many families will experience in their homes along the transit guideway will probably be two to three times noisier than predicted in the EIS. Response: No significant noise impacts are expected. The Final EIS shows there is less likelihood of a noise concern from the proposed rail system than there is from the existing street. Section 4.10 of the Final EIS also notes that there will be a noise monitoring program to evaluate noise once the project is in operation and if noise levels are higher than anticipated, additional mitigation may be implemented if the affected owners so desire.	**Ronald Darby** RAD Engineering, Ltd		Quality of housing and open air lifestyle would impact noise analysis results.	Yes	No

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53	7/16/10	F-l: Were any estimates calculated for noise levels inside typical homes along the guideway and, if so, what levels were found? Response: Noise levels inside homes will not change as the noise generated by the proposed rail system will be generally lower than existing street noise levels which, in general, are closer to homes than the rail guideway.	**Ronald Darby** RAD Engineering, Ltd		Conduct of interior noise levels	No	No
54	7/16/10	FTA criteria apply to outdoor human use areas: therefore indoor noise levels were not addressed. Response: (see response to comment 56) Noise levels inside homes will not change as the noise generated by the proposed rail system will be generally lower than existing street noise levels which, in general, are closer to homes than the rail guideway.	**Ronald Darby** RAD Engineering, Ltd		Indoor noise should be addressed.	No	No
55	7/16/10	The EIS ignores the noise criteria for inside residential living of other agencies including HUD, FHWA and EPA. Response: (see response to comment 56) Noise levels inside homes will not change as the noise generated by the proposed	**Ronald Darby** RAD Engineering, Ltd		Indoor noise should be addressed.	No	No

Comment [eaz27]: That is not a true statement.

FTA's Noise and Vibration criteria consider research conducted by EPA and HUD in developing noise criteria. Appendix B of FTA's Noise and Vibration Assessment goes into detail on the development of FTA's Noise impact criteria curves and how it was influenced by information from EPA and HUD.

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		rail system will be generally lower than existing street noise levels which, in general, are closer to homes than the rail guideway.					
56	7/16/10	The actual noise impact on families will be much greater than the EIS shows. Also there will be greater costs in upgrading fenestration and providing air conditioning when necessary. Response: In most locations, noise levels inside homes will not change as the noise generated by the proposed rail system will be generally lower than existing noise levels. Wheel skirts on the vehicles will reduce noise exposure levels to below the impact criteria at five of the eight locations where impacts are predicted (Final EIS Table 4-19). With wheel skirts, three of these residential sites still will experience moderate noise impacts on the fifth through eleventh floors. The moderate noise impact that will occur at the highrise buildings will only be experienced from units above track level on the fifth through ninth floors. The use of sound-absorptive materials under the tracks in these three areas will reduce the project noise exposure at upper	**Ronald Darby** RAD Engineering, Ltd		Noise impacts are greater than reported; costs to mitigate will be higher than reported.	Yes	No

Comment [eaz28]: FTA's noise and vibration analysis process is conservative and takes into account existing noise exposure

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		floors to below the moderate noise impact threshold. Once the Project is operating, field measurements for noise will be conducted at representative sites. Should the Project's noise impacts exceed the FTA noise impact levels, further mitigation may be implemented on the receivers with the authorization of the property owners.					
57	7/16/10	The EIS only consider the mandates of the Federal Transit Administration (FTA) which address only outside noise levels assuming that superior mainland-type closed windows and doors and seals will reduce the outside noise levels to acceptable inside noise levels for family living. Response: (see 56) Noise levels inside homes will not change as the noise generated by the proposed rail system will be generally lower than existing street noise levels which, in general, are closer to homes than the rail guideway.	**Ronald Darby** RAD Engineering, Ltd		Indoor noise should be addressed in applying FTA noise criteria.	No	No
58	7/18/10	Will the passengers need to pay each time they park their vehicles in the Park & Ride, then the Tram and finally the bus circulators to reach their destinations or	**Daisy Murai**		Fare collection	Yes	No

Comment [eaz29]: This is one of the reasons why FTA develops noise and vibration criteria for outside homes. Our noise impact criteria does not assume a certain reduction in noise from outside to inside the home. Though, that is a mitigation measure considered in some specific cases where noise impacts can not be reduced from measures like wheel skirts or noise barriers.

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		Will the single charge be fair to passengers finding their own way to the Transit station or center, ride the tram and get off at another station, but will not need to ride bus circulators to reach their final destination? Response: There is no plan at this time to impose a fee for park-and-ride parking. The fare for the train will be the same as TheBus with a free transfer. Monthly and annual passes will also be honored.					
59	7/18/10	The Drive time when UH Manoa is in session, is only about 10 - 20 minutes longer or 55- 70 minutes in heavy traffic. This is just 3 - 28 minutes longer than if one is to travel by the City's elevated Rail System to Ala Moana Center as mentioned in the BIS. This is the 42 minutes rail travel time only and does not account the time needed to park your vehicle in the Park & Ride Facilities, go up (30 to 80 feet –at Ala Moana Center) to the Boarding Platform to catch the Trams to your station, go down to the ground floor to catch bus circulators to your final destination. I feel this will take much longer than riding the Current City's TheBus, City & Country Express Bus services by the City, other private ExpressBus services, being dropped off or even by driving your own private	**Daisy Murai**		Not accounting for actual drive/walk time in estimation of overall travel time savings.	Yes	No

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		vehicle(s) to reach Downtown Honolulu from the West side. Response: The time of a trip will depend on the origin. From Kapolei, the time will be lower by rail than by car during the peak hour. Closer to UH, the time savings will be less, but will save on parking/gas and will obviate the need to drive. All fixed guideway stations will have escalators and elevators which will ease movement between the rail platform and the station area.					
60	7/18/10	I feel the City's High Capacity Mass Transit is not the ideal solution to Oahu's traffic congestion till 2030 as expressed in the Final EIS. Response: Of all the alternatives studied, it provides the most effective solution as noted in Chapter 2 of the Final EIS. While the figures used in the Final EIS refer to the year 2030 for forecasting purposes as required by federal guidelines, the construction of the project and the commencement of operations will occur by 2019	**Daisy Murai**		Does not support rail project.	Yes	No
61	7/18/10	The Transit Oriented Developments at the Rail Stations and Centers as well as the power stations along the route, may enhance or destroy the Communities it passes through, especially if existing	**Daisy Murai**		TOD, stations, TPSSs, transit centers may destroy or enhance communities.	No	No

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		buildings and establishments are displaced for the Rail Alignment. Response: There are relatively few buildings displaced by the project. There are 40 full acquisitions, most of them in one community, and 159 partial acquisitions. These are primarily narrow strips to allow a road to be widened once the guideway is built. The TOD program will work with the local communities to ensure the project supports the local character and enhances it into the future. Meetings have already been held in Waipahu and East Kapolei to engage the local residents and businesses.					
62	7/14/10 Council testimony	Union supports transit project and views the FEIS as a step forward. Response: N/A	**Leonard Hoshijo**		Supports Project. Provides jobs and economic stimulus	N/A	No
63	7/14/10 Council testimony	I am writing this letter in strong support of the FEIS for the Rail Transit Project. Response: N/A	**Joseph V. O'Donnell,** Ironworkers Union		Strong support for Project; provides jobs; removes vehicles from road; stimulates economy	N/A	No
64	7/14/10 Council testimony	Our goals is provide economic growth and jobs for our contractors and members of the Hawai'i Carpenters Union. Response: N/A	**Kyle Chock,** The Pacific Resource Partnership		Supports Project. Provides jobs; solves congestion; better quality of life.	N/A	No
65	7/14/10 Council	We strongly support the city's elevated rail plan because it will reduce traffic congestion in the future, make it easier to	**Jon McKenna,**		Supports Project; reduces congestion;	N/A	No

Comment [eaz30]: Not an acceptable response. Comment noted or thank you for your comment is better than N/A

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	testimony	travel between town and West Oahu and improve the business climate of our island. Response: N/A	West Oahu Economic Development Assoc.		improves; business climate.		
66	7/14/10	Opposes project: decades of debt to taxpayers; traffic congestion on Farrington Hwy and small neighborhoods, problems with structural rust; health and safety due to landfills. Response: The project has identified funding which includes that almost all debt incurred in its construction will be retired by the time the General Excise Tax surcharge sunsets in 2022. Congestion on Farrington may occur during construction and is addressed in Chapter 3 of the Final EIS. Rust is not an identified concern for the type of construction contemplated for the project. Landfills are not part of the project.	**Johnnie-Mae L. Perry**		Opposes Project; Cost issues; taxpayer debt; impacts to community	Yes	No
67	Council testimony	We are providing this written testimony in support of the acceptance of the FEIS for the HHCTCP. Response: N/A	**Wayne Kawano,** Cement and Concrete Products Industry of Hawaii		Supports Project; jobs and stimulates economy	N/A	No
68	Council testimony	We as a community support rail transit on Oahu. It's ready so let's build it. Response: N/A	**Bryan A. Mukai**, Brett Hill Construct, Inc.		Supports Project; efficient, affordable and reliable commute; clean and sustainable; jobs; economic stimulus;	N/A	No

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69	7/14/10 Council testimony	Technologies not considered. Response: Technologies and the process used to consider them are addressed in Chapter 2 of the Final EIS.	**Frank Genardio**		Technologies not considered adequately; high project costs; supplemental EIS desired	Yes	No
70	7/14/10 Council testimony	Can we assume that there will be no future engineering change proposals that increase costs? Response: The FTA imposes very strict controls over the manner in which costs are estimated. Once the project receives a Full Funding Grant Agreement from the FTA, any changes that affect costs will need to be borne by the City without federal assistance. However, approximately 30 percent of the project budget is set aside for contingency, which will go towards any costs that may arise in the future.	**Frank Genardio**		No guarantee that cost won't increase.	No	No
71	7/14/10 Council testimony	Will system suppliers' costs include the needed wheel skirts and will projected operating costs cover extra lubrication to prevent wheel squeals on curves? (The above are mentioned because none of those measures covered in the Final EIS, are required for a mag-lev system.) Response: The cost for wheel skirts is included in the projected operating	**Frank Genardio**		Cost of noise mitigation.	Yes	No

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		costs and will be included in the vehicle specifications.					
72	7/14/10 Council testimony	Does the current bid include the three-foot parapet needed along the guideway for noise mitigation and the sound-absorptive materials? Response: Yes.	**Frank Genardio**		Cost of noise mitigation.	Yes	No
73	7/14/10 Council testimony	The city has no choice but to prepare a Supplemental EIS. Response: Comment noted	**Frank Genardio**		Wants Supplemental EIS	No	No
74	7/14/10 Council testimony	I have been an ardent supporter of grade-separated transit since the early 1990s and feel strongly that the transit project must stay on course both physically and financially. Response: Comment noted.	**Taeong Kim**		None. Supports Project.	N/A	No
75	7/15/10 Council testimony	The Honolulu Chapter of the AIA (American Institute of Architects) has for the last five years urged the City to consider a light rail system. The transit system should be flexible and contain both elevated and street-level segments. Response: Both elevated and ground level alignments were examined during the AA phase. It was	**Spencer Leineweber, AIA**		Rail design flexibility needed in application of elevated and at-grade segments.	Yes	No

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		determined that an elevated system would be the most effective at meeting the Purpose and Need of the project.					
76	7/15/10 Council testimony	The people voted "yes" on rail in 2008 but there was nothing on the ballot about what kind of rail - "only steel on steel. The Department of Transportation Services (DTS) wants to use an electrified third "heavy" rail technology that can only be elevated or underground. Response: While the use of elevated rail is more effective at meeting the Purpose and Need of the project, the statement that it cannot be used in other operating environments is incorrect.	**Spencer Leineweber, AIA**		Steel on steel was not on ballot for public to vote.	Yes	No
77	7/15/10 Council testimony	We could shave billions off the project cost by putting rail on the ground in certain areas, and by doing so we will protect our precious *mauka- makai* view planes. Response: This comment has been thoroughly discussed in Chapter 8 of the Final EIS.	**Spencer Leineweber, AIA**		View protection by placing rail at-grade.	Yes	No
78	7/15/10 Council testimony	A supplemental EIS would be required to study this substantially better and cheaper light rail alternative because this combination	**Spencer Leineweber, AIA**		Supplemental EIS needed to study flexible LRT.	Yes	No

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		flexible system was not studied in the FEIS. Response: All reasonable options have been considered and the project addressed in the Final EIS is the most effective in meeting the project's purpose and need.					
79	7/15/10 Council testimony	We urge consideration of these other options before a commitment is made by the Mayor to buy heavy rail trains. Response: All reasonable options have been considered and the project addressed in the Final EIS is the most effective in meeting the project's purpose and need.	**Spencer Leineweber, AIA**		Consider other options and forestall purchase of trains	Yes	No
80	7/14/10 Council testimony	We believe that the Honolulu High-Capacity Transit Corridor Project is' the single most important project before our generation, and urge the City Council to work to begin construction on the project as expediently as possible. Response: Comment noted.	**Wesley Perry**		Supports Project	N/A	No
81	7/14/10C Council testimony	So, Say Yes to Rail Development! Response: Comment noted.	**Seanna Pieper-Jordan**		Supports Project	N/A	No
82	7/14/10 Council testimony	LOTMA supports the city's initiative to build and operate a high capacity rail transit system to serve the	**Debbie Luning**		Supports Project	N/A	No

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		growing transportation needs of our future and supports the Final Environmental Impact Statement for the Honolulu Rail Transit project (FEIS). Response: Comment noted.					
83	7/14/10 Council testimony	The City should not spend roughly $5.5 billion on a solution that will make such a minimal difference in traffic congestion, particularly given our county's and state's inability to balance the budget without raising more taxes and fees-not to mention the mounting pension costs that could very well bankrupt the state even without rail. Response: The proposed alternative is the most effective at addressing transportation needs in Honolulu and the funding for the project is mostly in place through the imposition of a ½ cent General Use and Excise Tax (GET) surcharge that can only be spent on the project. The difference in the building the project and not building it is not minimal and is much more effective than any other option evaluated. It makes less sense to spend a large amount of money on a less expensive project that offers no	**Kyle Shiroma, LOTMA**		Project cost is too high for minimal difference achieved in reducing congestion.	Yes	No

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		effective relief at all.					
84	7/14/10 Council testimony	It is likely that the proposed Rail Transit system will carry fewer passengers than predicted, thereby rendering all net cost projections incorrect. Response: ~~There is no basis for this statement.~~ The forecasts have been completed following specific direction from the FTA as indicated in Chapter 3 of the Final EIS.	**Kyle Shiroma**		Ridership predictions are optimistic.	Yes	No
85	7/14/10 Council testimony	There will most likely be no energy savings with the rail transit system. Response: There is no substantiated basis for this statement. Section 4.11 of the Final EIS shows the energy effects of the project to be beneficial.	**Kyle Shiroma**		Energy savings unlikely.	Yes	No
86	7/14/10 Council testimony	A closer look at the FEIS reveals that the proposed Rail Transit system is not only fiscally irresponsible, but will have minimal impact on traffic and energy usage. The ridership projections are unreasonable and the estimated 1.7% reduction in auto trips is low for a $5.5 billion price tag. Response: It is the most effective option evaluated when compared to managed lanes, additional bus service, at grade rail systems, etc.	**Kyle Shiroma**		High project cost does not justified for little return on reducing traffic congestion, low ridership and energy use.	Yes	No

Comment [eaz31]: Would prefer to explain why there is no basis for the statement than to just say there is no basis for the statement.

Just state why there is a difference of opinion and base that opinion to sections in the FEIS or technical reports or other studies.

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		The details of these effects are shown in Chapters 2, 3, 4 and 6 of the Final EIS. Additionally, the 1.7% reduction is island wide; traffic reduction will be substantially higher in the corridor during peak periods.					
87	7/14/10 Council testimony	AARP believes the rail project is the most viable transit proposal on the table. Response: Comment noted.	**Barbara Kim Stanton. AARP**		Supports Project	N/A	No
88	7/14/10 Council testimony	Safety is always a concern regarding our seniors. We believe that the elevated or exclusive right-of-way will prevent the kind of collisions experienced with on-grade systems. Response: Experience in other systems indicates this to be a reasonable expectation.	**Barbara Kim Stanton. AARP**		Project will improve safety.	Yes	No
89	7/14/10 Council testimony	Regarding the routing, we commend the Council for amending the route from Salt Lake to the airport as that is a more frequent destination for seniors as well as the general population. Response: The Airport alignment is the preferred alternative in the Final EIS.	**Barbara Kim Stanton. AARP**		Agrees with selection of Airport route.	Yes	No
90	Council testimony	Rail is transportation infrastructure necessary for our island's quality, growth ~ N ~prosperity. But a	**Shermon Wong**		Supports Project	Yes	No

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		significant side benefit is the economic stimulus effect it would bring to our entire state now. Response: Comment noted.					
91	7/14/10 Council testimony	Concerns about View Planes and Community Intrusion - Instead of providing concrete solutions or tangible and measurable mitigation as we believe it should, the FEIS says these negative visual effects will be mitigated through application of design guidelines, intergovernmental cooperation, consulting with communities and through landscaping and tree planting. Response; The solutions will vary from place to place. Visual mitigation includes landscaping and treatment for columns and guideway. These are concrete solutions that must be defined at the time of design.	**Bob Loy, Outdoor Circle**		Visual impacts not mitigated as proposed by Project.	Yes	No
92		Street Trees – The FEIS does not specify locations for transplants or new trees. Instead that will be decided later based upon need. There is no mention of how the City will deal with unsuccessful transplants, which likely will be	**Bob Loy, Outdoor Circle**		Survival of street trees that are removed.	Yes	No

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		significant. Response: The preference is to replant transplanted trees as close to their original location as possible. An allowance will be provided to cover loss of trees that do not survive transplantation.					
93		The City claims additional trees will be added during final landscaping, but the lack of detail in the FEIS makes it impossible to determine whether these measures will be adequate. Response: The Final EIS is based on preliminary design and therefore, specific detail regarding final landscaping cannot be developed. Landscaping plan, that will include planting new trees will be developed during final design when there is the detail available to determine which trees will need to be moved. Landscaping plans will be prepared by a landscape architect and will comply with City ordinances.	**Bob Loy, Outdoor Circle**		Inadequate information provided on number of tree replacement.	Yes	No
94		Landscape Plans: - With literally no specific information upon which to base a conclusion, it is virtually impossible to determine what the effectiveness of the (landscaping plans) mitigation might be.	**Bob Loy, Outdoor Circle**		No detail provided on Project landscape plans.	Yes	No

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		Response; Landscaping is a function of the design process and only preliminary design is completed for the Final EIS. This typically does not include landscaping plans.					
95	7/14/10C Council testimony	It should be clear to most residents that the Honolulu transit system will be a permanent, physical and visual barrier that separates hundreds of thousands of people from the oceanfront It will create huge, monolithic structures that will forever change the character and livability of many communities through which it will pass. Whatever good it might bring to the city and its people will be at the expense of the beauty of this island and the degradation of the communities and neighborhoods it is supposed to serve. Response: In most areas, the guideway will be minimally visible through existing development. In other locations, the project can spur improvements that will make the communities better than they are now. But Chapter 4 of the Final EIS recognizes there are locations where the effect could be detrimental to the visual quality of the area.	**Bob Loy, Outdoor Circle**		Permanent visual impact of Project	Yes	No

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96	7/14/10 Council testimony	The rail transit will greatly improve access by walkers, cyclists, and transit riders to "jobs, shopping, services, and recreation," by cutting some travel times over 65%. Response: Comment noted.	**Hannah Miyamoto Sierra Club**		Improvement in access.	N/A	No
97	7/14/10 City Council testimony	The proposed elevated rail transit system will encourage land use patterns that minimize travel requirements, while strengthening local communities. Response: Comment noted.	**Hannah Miyamoto, Sierra Club**		Rail will support good land use.	N/A	No
98	7/14/10 City Council testimony	An at-grade rail line would attract few additional riders than the existing bus service; it would have no effect on traffic congestion (and actually causing quite a bit) or pollution reduction. Consequently, an at-grade rail line is very unlikely to receive significant federal funds, making it less economically feasible than the elevated rail system under consideration now. Response: The discussion of the at-grade option is in Chapter 8 of the Final EIS.	**Hannah Miyamoto, Sierra Club**		Disapproves of an at-grade LRT.	Yes	No
99	7/14/10 City Council testimony	Any careful environmental analysis must conclude that the visual impact from the proposed elevated rail transit line is	**Hannah Miyamoto Sierra Club**		Visual impact is outweighed by the comparative advantages of the Project.	Yes	No

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		outweighed by the many comparative advantages of choosing the elevated rail line over doing nothing or stopping the planning process and beginning a new process of designing an at-grade rail line. Response: Comment noted.					
100	7/14/10 City Council testimony	Rail will provide this fast, reliable service and improve mobility for commuters. Response: Comment noted.	**Karen Nakamura, BIA-Hawaii**		Project will improve reliability and mobility.	N/A	No
101	7/14/10 City Council	Rail will put thousands of construction workers back on the job, not only during rail construction, but for the long term as TOD addresses infrastructure replacement and capacity building near rail stations and along the rail line. Response: Comment noted.	**Karen Nakamura, BIA-Hawaii**		Rail will provide jobs.	N/A	No
102	7/14/10 City Council	More important to Hawaii's economy is the infusion of development dollars from outside investors through transit oriented development (TOD). Response: Comment noted.	**Karen Nakamura, BIA-Hawaii**		Project will improve economy.	N/A	No
103	8/4/10	Having been present at the time that	**Frank**		Recognized that	No	No

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	letter	you, in effect, advised the City Council of the City and County of Honolulu High-Capacity Transit Project Final Environmental Impact Statement (EIS) would be received but not acted upon; I am sending my comments to you only to meet the requirement. Similar comments (with a different lead paragraph) are being sent to Region IX. Response: Comment noted.	Genadio		comments to FEIS will not be responded to.		
104	8/4/10 Letter	In testimony to the City Council, I called the EIS a "self-fulfilling prophesy" based on false premises and an incomplete analysis. As written, it should be rejected by both the Federal Transit Administration and the Governor of the State of Hawaii. Response: Comment noted. The Final EIS was approved for release by the Federal Transit Administration.	Frank Genadio		Reiterated that FEIS is deficient and should be rejected.	No	No
105	8/4/10 Letter	The city's justification for a steel wheel on steel rail (SWSR) system is based on the findings of its (so-called) expert panel in February 2008. Everything else in the Final EIS flows from that finding, with the city using it to justify why NO environmental analysis was done for	Frank Genadio		No analysis was done for non-steel-wheel on steel technology.	Yes	No

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		non-SWSR technologies. Response: As explained in comment letters and Chapter 2 of the Final EIS, other technologies for the transit system were eliminated because they were proprietary technologies and they did not offer the proven performance, cost, and reliability offered by the steel wheel on steel rail technology.					
106	8/4/10 Letter	This is a flagrant disregard of the Notice of Intent for this EIS, as filed in the Federal Register of March 15,2007, which states that "The draft EIS would consider five distinct transit technologies: Light rail transit, rapid rail transit, rubber-tired guided vehicles, a magnetic levitation system, and a monorail system." Neither the Draft nor the Final EIS comes close to anything resembling a consideration of technologies other than SWSR. Response: As explained in comment letters and Section 2.2.3 of the Final EIS, the NEPA Notice of Intent requested input on five transit technologies. A technical review process occurred, which allowed opportunity for public comment. The	**Frank Genadio**		Not analyzing other technologies does not comply with NOI description.	Yes	Yes Describe in ROD

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		panel selected steel wheel on steel rail technology by a 4 to 1 vote.					
107	8/4/10 Letter	Those of us who attended-and testified at-both public meetings of the technology panel, whose members were (supposedly) not permitted to discuss the project with each other during the week between meetings, quickly realized that its findings were decided well in advance (as substantiated by its lone dissenting member, University of Hawaii Professor Panos Prevedouros in an article for the April 17, 2008 Honolulu Star-Bulletin titled "Transit panel selection was case study in manipulation". Even the panel members stated (at the time) that they were lacking cost information but still made their (poorly considered) recommendation. Response: Comment noted. The panel's findings were summarized in a report to the City Council dated February 22, 2008.	Frank Genadio		Feels decision on steel on steel was decided before hand and prior to technology panel.	Yes	No
108	8/4/10 Letter	The Final EIS, despite the supposed intent to cover all rail technologies, rejects rubber tire on concrete, monorail, and magnetic levitation systems as "proprietary" and falsely claims that	Frank Genadio		False claims against non SWSR technologies (e.g., proprietary, prohibited competitive bidding) and therefore were not adequately	Yes	No

Comment [eaz32]: Check with legal.

Be more specific on the technical review process. Provide information on specific reports and links to those reports in the NEPA documents and other supporting technical documents.

Comment [eaz33]: Was this comment responded to?

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		" ...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." In fact, in 2008 briefings, the Honolulu City Council's transportation committee received more detailed cost and performance information from the magnetic levitation (mag-lev) system supplier than it did from any SWSR system supplier. There also was no need to select a technology in advance of issuing a Request for Proposals; the more bidders, the better the chance for valid cost and performance comparisons (i.e., a more competitive bidding process than what the city will obtain from the three remaining SWSR suppliers.) Response: Comment noted.			considered.		
109	8/4/10 Letter	The city, which went ahead with contracting despite lack of federal approval for its project, has been "talking up" the money "saved" with a low bid for the first segment of the	**Frank Genadio**		Premature of contract award without federal approval to do so.	No	No

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		guideway, and the likelihood of continued low bids. Response: FTA has been involved with project decisions, including contracting. The contracts were not done prematurely.					
110	8/4/10 Letter	Can we assume that there will be no future engineering change proposals that increase costs? Response: There is $1 billion in contingency included in the project budget.	**Frank Genadio**		Will project continue to realize cost savings from future contracts?	Yes	No
111	8/4/10 Letter	Does the current bid include the three-foot parapet needed along the guideway for noise mitigation and the sound-absorptive materials? Will system suppliers' costs include the needed wheel skirts and will projected operating costs cover extra lubrication to prevent wheel squeals on curves? (The above are mentioned because none of those measures, covered in the Final BIS, are required for a mag-lev system.) Response: The parapet wall is included in the cost of the project. As	**Frank Genadio**		Do project costs include cost for noise-related design and mitigation?	Yes	No

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		stated in Section 4.10.3, wheel skirts are included in the vehicle specifications.					
112	8/4/10 Letter	The Final EIS also mentions potential system extensions of 14 miles and 12 stations (or more). Perhaps rail opponents who claim the $5+billion for the currently planned system are thinking about that when they mention a $10 billion final price. Response: Comment noted.	**Frank Genadio**		Cost of future extensions.	No	No
113	8/4/10 Letter	Mag-lev proponents claim at least 20 percent savings on guideway construction and 20-30 percent savings on operations and maintenance (O&M) costs-but a supplier cannot even make a bid. Obviously, savings for 34 miles of mag-lev guideway construction and 30 years of operations would be substantial. Response: As stated in comment response letters, no comparative mag lev system has been built within the US, therefore there is no data to support cost estimates.	**Frank Genadio**		Cost savings can be realized with Mag-lev but suppliers can't bid.	No	No

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114	8/4/10 Letter	Because the Final EIS does not contain a full evaluation for each of the qualified rail technologies, it must be rejected because of its failure to meet the Record of Intent. Response: Not all alternatives specified in the Notice of Intent must be carried forward into the Final EIS if an alternative is found to be superior to the others.	**Frank Genadio**		FEIS should be rejected since all technologies not fully evaluated.	No	Yes
115	8/4/10 Letter	The city has no choice but to prepare a Supplemental EIS. Response: According to 23 CFR § 771.130, a Supplemental EIS is prepared when the Administration determines that: (1) Changes to the proposed action would result in significant environmental impacts that were not evaluated in the EIS; or (2) New information or circumstances relevant to environmental concerns and bearing on the proposed action or its impacts would result in significant environmental impacts not	**Frank Genadio**		Prepare Supplemental EIS.	No	No

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		evaluated in the EIS. Neither of these instances is applicable.					
116	8/4/10 Letter	Would the incurred delay hurt or benefit the rail project? I believe that an EIS that covers all technologies, followed by an open competition among those technologies, will bring O'ahu a more operationally effective system at a lower cost. Response: Comment noted. The EIS covers steel wheel on steel rail, which is the technology supported by the technology panel.	**Frank Genadio**		Possible lower cost for project if all technologies studied in a Supplemental EIS.	No	No
117	8/4/10 Letter	I have briefed (to the City Council) and written about 20-mile guideway construction and O&M savings of $1.5 billion-and not one person in the city administration, its Department of Transportation Services, or the City Council ever disputed those numbers (i.e., Because they are realistic). Response: As stated in comment response letters, no comparative mag lev system has been built within the US, therefore there is no data to support cost estimates.	**Frank Genadio**		No response received on potential cost savings given to City Council.	No	No

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118	8/4/10 Letter	As the Japanese Linimo (or HSSl) urban mag-lev in Nagoya completed five years of reliable, safe, and quiet operations earlier this year, ground is broken for guideway construction o f the Korean Rotem mag-lev in Incheon and the Chinese continue plans for a Beijing system, federal officials in the United States show little interest in an emerging-but proven-technology. Response: comment noted.	**Frank Genadio**		Promotion of Japanese Linimo Mag-lev and future Korean Rotem.	No	No
119	8/4/10 Letter	Arguments can be made about staying with SWSR where existing infrastructure impacts new development. On O'ahu-with no existing rail track or guideway that might be used for SWSR we have the ideal situation for implementing a fast, safe, reliable, quiet, and less costly mag-lev system that also would reduce physical and visual impacts along its alignment. Response: The project will use steel wheel on steel rail technology as selected by the technology panel because it is considered safe, reliable, economical, and non proprietary.	**Frank Genadio**		Support and less impacts of Mag-lev instead of SWSR.	No	No

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120	8/4/10 Letter	There is no need for me to repeat everything detailed in my previous comments of the Draft EIS, since your "lead-in" provides the city's (unsubstantiated) rationale for not bothering to provide real answers. Response: Comment noted.	**Frank Genadio**		Insufficient response to comment.	Yes	No
121	8/4/10 Letter	I must, however, point out that the city just ignored my request for overhead views of the guideway along its alignment while, instead, showing very misleading renderings of the guideway from ground level. It is quite obvious that the SWSR 32-foot wide "bridge" would suffer in comparison to the twin beams of a mag-lev guideway (21 feet across, with open space between the beams). Response: Comment noted. Visuals were provided for steel wheel on steel rail as that is the technology explored in the Final EIS.	**Frank Genadio**		Request for additional overhead simulations was ignored.	Yes	No
122	8/4/10 Letter	Those of us who have been following the efforts of mag-lev proponents to develop both high speed and urban systems on the United States	**Frank Genadio**		Mag-lev proponents are seeing more support for considering it in the U.S.	Yes	No

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		mainland are well aware of the obstacles they have faced in recent years. FTA acceptance of this city's Final EIS would contradict its (supposed) intent to introduce mag-lev technology, as summarized in the Colorado Maglev Project (CMP) report in 2004: "The CMP brings to the United States renewed competition in the urban/suburban/rural transit market with the potential to lower the costs of future transit deployments in the country." The vehicle mentioned in the report, the CHSST, is a larger train car version of the Nagoya HSST, described as "a mature maglev technology with over 30 years of development and deployment experience. The technology is deployable now in the United States. Response: Comment noted.					
123	8/4/10 Letter	It will be an affront to O'ahu taxpayers and commuters to deny them the opportunity of seeing a fair and open competition for the island's transit system.	**Frank Genadio**		Open competition on non-SWSR should be done.	Yes	No

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		Response: Competitors had the opportunity to provide information during the technology panel's review. 12 responses were submitted, covering all of the technologies in the Notice of Intent.					
124	8/12/10 Letter	PGC continues to support the concept of steel-on-steel rail transit for the City and County of Honolulu. Response: Comment noted.	**H. Brian Moore**, Asset Mgr., Pacific Guardian Center		Supports steel on steel technology	Yes	No
125	8/12/10 Letter	Disagrees with a number of assertions in the response letter regarding the project's impacts to the Dillingham Transportation Building and the Plaza within the PGC complex. Based on a review of the FEIS, concerns remain on the location, size, and bulk of the proposed elevated guideway and Downtown Station as well as the high foot traffic to and from the station will have significant and detrimental impacts to the PGC and its tenants. Response: The Project elements, including the guideway and stations,	**H. Brian Moore**, Asset Mgr., Pacific Guardian Center		Disagrees with assertions in response to comment letter re: Dillingham Transportation Building (DTB)	Yes	No

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		are being designed to minimize their effect on historic resources, existing buildings, roadways and businesses. As indicated in both the Draft and Final EIS, the mauka entrance of the downtown station will be designed to fit carefully within the existing environment, minimizing the effect on the plaza and the Dillingham Transportation Building.					
126	8/12/10 Letter	The Dillingham Transportation Building (DTB) is a National Historic Site. Any project receiving federal funding which impacts the DTB must comply with Federal Standards for Historic Buildings as administered by the Secretary of the Interior. The FEIS does not contain the signed Programmatic Agreement between the City and local consulting parties to resolve negative impacts to the DTB and other historic sites. For this reason we would urge the FTA to not accept the FEIS at this time. Response: A signed PA is not needed for release of the Final EIS.	**H. Brian Moore**, Asset Mgr., Pacific Guardian Center		Since Section 106/PA is incomplete do not accept FEIS.	Yes	No
127	8/12/10 Letter	We are concerned that the close	**H. Brian Moore**, Asset		Station will block makai/Diamond Head	Yes	No

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		proximity (40 feet) of the elevated guideway structure to the makai facade of the building and the equally close proximity (30-40 feet) of the Downtown Station entrance structure to the makai-Diamond Head corner of the building will block DTB tenants' makai views and significantly iminish the economic value of these spaces. Response: The view referenced in the comment is of the wall of the HECO electric station. Though it is a matter of personal preference, it unlikely that the Project would affect the economic value of the building related to the view.	Mgr., Pacific Guardian Center		views.		
128	8/12/10 Letter	We also remain concerned that noise impacts, particularly on the upper floors of the building, have not been adequately addressed by either the DEIS or the FEIS. Low parapet walls along the edges of the guideway proposed for noise mitigation will direct noise upward and away from ground level but we are concerned that the redirected noise will disturb and interrupt upper floor businesses and make it further difficult to attract	**H. Brian Moore**, Asset Mgr., Pacific Guardian Center		Noise impacts on upper floors of Dillingham Building.	Yes	No

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		and retain tenants in the affected spaces. Response: Wheel skirts will be included on all vehicles and parapet walls will be part of the guideway design, which will help decrease noise impacts on floors above the guideway.					
129	8/12/10 Letter	The June 11 letter indicated that the latest station entry design has been changed to direct "pedestrians approaching the entrance primarily through the Dillingham Transportation Building arcade". This represents a change from the scheme detailed in the DEIS (pedestrians walking the length of the plaza) and in our opinion creates a significant impact on the DTB. According to the FEIS (Figure 3-9), 4,690 riders are projected to enter and exit the Downtown station during the 2-hour peak period weekday mornings. We are very concerned about the impact of foot traffic of this magnitude on the arcade. Many of the ground floor tenants cater to Downtown workers for breakfast and lunch and	**H. Brian Moore**, Asset Mgr., Pacific Guardian Center		Impact to Dillingham Building due to station riders passing through.	Yes	No

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		utilize portions of the arcade for customer to sit and talk in a relatively secluded area. We are concerned that the increased foot traffic through the arcade created by the transit project will lead to a loss of tenants and rental income. Response: The mauka station entrance location was selected in part to avoid placing pedestrians in conflict with automobile traffic. However, it does not affect the arcade of the Dillingham Building. Potential station entrance locations on Alakea Street were examined and rejected due to the potential for conflict between pedestrians and vehicles entering and exiting buildings including the Pacific Guardian Center. Approximately 45% of the daily traffic to and from the mauka station entrance will occur during the early morning and late afternoon peak commute periods. Many of the rail patrons will be those who use the services offered in the park-like area.					
130	8/12/10 Letter	According to the FEIS, the area of the plaza which would be appropriated	**H. Brian Moore**, Asset Mgr., Pacific		Dillingham Transportation Building: Use of plaza may change	Yes	No

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		for the mauka Downtown Station entrance has been increased from 2,400 sf to 3,000 sf. We have continuing concern with the DTS's assertion that the Downtown Station entrance "would not eliminate the open space or alter its use." The projected foot traffic to and from the Downtown station has been revised from 2,500 (DEIS Figure 3-10) in the 2-hour morning peak periods to 4,690 (FEIS Figure 3-9). Response: The Project elements, including the guideway and stations, are being designed to minimize their effect on historic resources, existing buildings, roadways and businesses. As indicated in both the Draft and Final EIS, the mauka entrance of the downtown station will be designed to fit carefully within the existing environment, minimizing the effect on the plaza and the Dillingham Transportation Building.	Guardian Center		due to significant transit patron traffic through plaza.		
131	8/12/10 Letter	As noted in the January 2009 letter, the vast majority of transit riders will use the mauka station entrance due to its direct access to the Central	**H. Brian Moore**, Asset Mgr., Pacific Guardian Center		Dillingham Transportation Building: Security concerns to keep plaza safe	No	No

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		Business District. With the transit system operating daily from 4 a.m. to midnight (trains arriving every 3 - 10 minutes) we are concerned that PGC will require a significant increase in security personnel as well as maintenance staff to keep the plaza area safe and attractive for the use of our tenants. Response: All transit stations and facilities, including entrance plazas, will have security cameras and will be patrolled by security guards.					
132	8/12/10 Letter	We are also concerned that with limited conveniences within the station (only one restroom, for example) transit riders will turn to PGC facilities (restrooms, drinking fountains and benches) for their needs, particularly during the afternoon rush hour when foot traffic will "bottleneck" on the plaza due to the limited capacity of the station entrance Response: All station access	**H. Brian Moore**, Asset Mgr., Pacific Guardian Center		Dillingham Building: Station bathroom is inadequate.	Yes	No

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		elements, including escalators, elevators and stairs will be designed to serve the peak level of pedestrian traffic. An adequate number of restrooms will be included at each station to meet the anticipated need.					
133	8/12/10 Letter	We are concerned that the open space of the plaza will be significantly reduced by the 3,000 sf station entrance and support buildings and that the use of the plaza will be changed from a private tenant amenity to a public thoroughfare. Response: The mauka entrance of the downtown station will be designed to fit carefully within the existing environment, minimizing the effect on the plaza and the Dillingham Transportation Building. The City will work with the Pacific Guardian Center to create a logical pathway for station users that minimizes the effect on the plaza and arcade.	**H. Brian Moore**, Asset Mgr., Pacific Guardian Center		Dillingham Building: Use of plaza will change due to public thoroughfare by Project.	No	No
134	8/12/10 Letter	The water feature at the makai end of the plaza currently houses the DTB's only common trash enclosure. There is no available alternative location for a trash enclosure that is convenient to	**H. Brian Moore**, Asset Mgr., Pacific Guardian Center		Dillingham Transportation Building: Impact to water feature and trash enclosure.	No	No

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		both the DTB and the 2 office towers. The water feature also screens off views of the roadway and masks traffic noise. Removal of this water feature and the landscaping behind it will open the plaza to the street noise of Nimitz Highway and significantly degrade the quality of the plaza. Response: The mauka station entrance will be designed to accommodate the trash enclosure in approximately the same location. The station entrance will mask traffic noise and screen views of Nimitz Highway in a similar manner as the current water feature.					
135	8/12/10 Letter	We would not have the concerns mentioned above if the project was changed to light rail transit. We strongly urge the City to consider changing the project technology from "hot" third rail to overhead or underground power wire technology. Response: As discussed in the Final EIS, the project will be elevated. An	**H. Brian Moore**, Asset Mgr., Pacific Guardian Center		Change technology to light rail transit.	Yes	No Note: comments #s 124 – 135 would change if LRT replaced project.

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		at-grade system would remove traffic lanes downtown which would increase traffic in an already congested corridor.					
136	8/12/10 Letter	This would give the City much greater flexibility in locating stations and routes, minimizing negative impacts associated with transit in urban areas. While an at-grade route on Nimitz Highway may not be advisable, locating an at-grade light rail system closer to the center of the Downtown on either King or Hotel streets, offers greater convenience to riders and avoids the negative impacts to the PGC detailed above. Response: An at-grade system on King or Hotel Streets would impact many historic and cultural landmarks, including Iolani Palace.	**H. Brian Moore**, Asset Mgr., Pacific Guardian Center		Dillingham Building: minimize negative impacts of elevated rail.	No	No
137	8/12/10 Letter	If the mauka entrance to an elevated Downtown Station must be located within the PGC property, we strongly urge the City to shift the entrance from the makai-Diamond Head corner	**H. Brian Moore**, Asset Mgr., Pacific Guardian Center		Dillingham Building: Shift station entrance to Eawa side of Alakea St.	Yes	No

Comment [eaz34]: An elevated system would also affects historic properties. Is there more information on why these route alternatives were not considered further?

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		of the plaza (as shown in FEIS Appendix S, Drawing RP023) to the Ewa side of Alakea Street. Response: This option has been investigated and does not work as effectively because of limited space and excessive conflicts between vehicles and pedestrians along Alakea.					
138	8/12/10 Letter	The accessory structures needed to bring transit riders from station level to the street could be incorporated into the lower floors of the makai office tower which are used mainly for parking. Concealing these accessory facilities within the makai tower would result in significantly less visual impact to the area and allow more flexibility in the capacity of stairways and escalators. The Ewa lane of Alakea Street (used for parking) could be used for a widened pedestrian walkway and the PGC parking entrance could be reconfigured to minimize pedestrian-vehicular conflicts. Response: The station will offer	**H. Brian Moore**, Asset Mgr., Pacific Guardian Center		Concealing accessory facilities within the makai tower would result in significantly less visual impact to the area and allow more flexibility in the capacity of stairways and escalators.	No	No

Comment [eaz35]: See this explained further in XXX analysis.

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		opportunities for design input during the design process. If this option works better and can be accommodated and remain effective in handling the needs of the station and adjacent locations, it can be considered.					
139	7/20/10 email	The City did not give a direct response to each of our comments or questions but instead sent paragraphs that should "address your comments regarding the above-referenced submittal." This response makes it exceedingly difficult for use to cross check our questions and comments with the City's answers which is critical in ensuring that all our concerns have been addressed in this disclosure document. Response: The City responded to every comment raised in the letter. Headings were used in the response letter to help with cross referencing.	**Hawaii's Thousand Friends,** Donna Wong		Difficulty in tracking DTS' response to their comments and that all comments were responded to.	Yes	No
140	7/20/10 email	Hawaii's Thousand Friends have read hundreds of EAs and EISs and this is the first one that has not directly answered our comments or questions. Response: FTA reviewed the City's	**Hawaii's Thousand Friends,** Donna Wong		Response to comments is inadequate.	Yes	No

Comment [eaz36]: Will need to double check to see if there can be some clarifications.

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		response letter to your comments and found it adequately addressed all comments raised.					
141	7/20/10 email	The City's vague responses such as "Air passengers are expected to be a very small percentage of overall travel on the fixed guideway" to HTF's question about why the route was changed from Salt Lake, where thousands of people would live in close proximity to a rail system, to the airport route are perplexing and make it extremely difficult for us to ensure that our concerns and answers have been satisfactorily responded too. Response: The first paragraph of the response letter stated the alignment was shifted to the Airport based on benefits of each alternative, public and agency comments, and City Council action.	**Hawaii's Thousand Friends,** Donna Wong		Inadequacy of response on why Salt Lake alternative was changed.	Yes	No
142	7/20/10 email	The lack of specificity and thousands of pages including appendices and technical reports is making it extremely difficult and frustrating to review the FEIS to ensure that our concerns regarding the protection of natural and cultural resources have been adequately addressed by the City and County of Honolulu Response: The response letter	**Hawaii's Thousand Friends,** Donna Wong		Lack of specificity in FEIS and appendices.	Yes	No

Comment [eaz37]: The responses to comments on the DEIS are FTA's responses to comments as well as the Citys. Therefore the way this is phrased does not make sense. Instead, the response in this document should be expanded and the response to the DEIS comment should be double checked for clarity. If needed, additional clarification should be added in this document.

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		addresses all concerns raised in your comment letter and includes references to relevant sections from the Final EIS.					
143	7/20/10 email	We are reviewing the City's response and FEIS to ensure that the City has met its obligation with regard to Environmental and Social Justice since hundreds of individuals and businesses will be negatively impacted by the rails system Response: Comment noted.	**Hawaii's Thousand Friends,** Donna Wong		Assurance that environmental and social justice issues have been addressed.	Yes	No
144	7/20/10 email	While we struggle to comprehensively and thoroughly review the FEIS it is difficult for us to understand how the FTA can agree that the DEIS and the City have met all NEPA requirements. Response: Comment noted.	**Hawaii's Thousand Friends,** Donna Wong		NEPA requirements have not been met.	No	No
145	7/20/10 email	This is especially perplexing since City Transportation Director Wayne Yoshioka has publicly stated that the FEIS "isn't 100 percent complete" and "further work" needs to be done on the programmatic agreement with the federal government, State Historic Preservation Division, and the State Department of Land and Natural Resources on the issue of Hawaiian `iwi being found along the route. Response: A final, signed PA is not needed for release of the Final EIS.	**Hawaii's Thousand Friends,** Donna Wong		How can FEIS be completed when PA not signed?	Yes	No

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		The PA is still being reviewed by necessary parties and will be signed before issuance of a Record of Decision by FTA.					
146	7/20/10 email	Could you please explain how the FTA was able to approve the FEIS before the above agreements and documents were completed and included in the FEIS? Could you also explain how citizens are supposed to comprehensively respond to this disclosure document when the above agreements and documents are neither completed nor included in the FEIS? Response: A signed PA is not needed for release of the Final EIS. It will be prior to a Record of Decision	**Hawaii's Thousand Friends,** Donna Wong		How can FEIS be completed when PA not signed?	No	Describe in ROD
147	7/20/10 email	Could you also explain how citizens are supposed to comprehensively respond to this disclosure document when the above agreements and documents are neither completed nor included in the FEIS? Response: This is not an official public comment period under NEPA though it is interpreted that way by many. Nonetheless, the FEIS	**Hawaii's Thousand Friends,** Donna Wong		How can FEIS be completed when PA is not signed?	No	Describe in ROD

Comment [eaz38]: The transportation director mispoke. The NEPA process for Environmental Impact Statements is not completed until FTA makes a final agency determination in the form of a record of decision. Before FTA issues a record of decision, FTA will consider the entire record of the project include comments received on the FEIS and completion of a PA for conclusion of the National Historic Preservation Act Section 106 process.

Comment [eaz39]: Rather than say it is not an official comment period… Although not required for the NEPA process, because there were minor changes in the proposed action since the publication of the Draft Environmental Impact Statement, FTA chose to invite public comment on these specific changes. A draft version of the programmatic agreement was included in the Final EIS and a draft version was sent to consulting parties on November 17th for a two-week review period.

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		includes a draft of the PA, so it is available for review.					
148	7/20/10 email	We are aware that the deadline to respond to the FEIS is July 26 but we are finding that deadline impossible to meet thus we are requesting a 30 - 60 day extension in which to respond. Response: The comment period was extended to August 26.	**Hawaii's Thousand Friends,** Donna Wong		Requested extension of wait period.	No	No Extension was granted
149	7/20/10 email	We look forward to your answers to our questions and very much appreciate any assistance you can give us on extending our response time. If you have any questions please contact me at 808-262-0682 or via this email address. Response: Comment noted.	**Hawaii's Thousand Friends,** Donna Wong		Request response to comment letter and granting of extension of wait period.	Yes	No
150	7/20/10 letter	The EIS mentions, since one traffic lane is not wide enough to accommodate the support columns of the elevated rail tracks, the neighboring traffic lanes will need to be narrowed to 10 feet wide. This criteria applies only to areas that have existing buildings, not to the open land areas in East Kapolei and other properties the City will acquire.	**Daisy Murai**		Narrowing of traffic lane to accommodate columns.	Yes	No

Comment [eaz40]: This isn't as much of a comment on the FEIS as the closing of a letter.

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		Response: Your comment about narrower traffic lanes is noted. Lanes were narrowed in order to minimize right of way acquisitions and only where the width remains consistent with acceptable standards.					
151	7/20/10	The EIS has a simulation of various passengers boarding the RailTrams in a matter of 30 seconds with no difficulty - even a wheelchair individual, but the 6-8 passengers shown boarding, is typical during NON-RUSH HOURS. The true test is during RUSH HOUR when 20 or more passengers, including bicycle riders, other handicapped individuals, parents with children & baby strollers and when more than I wheelchair bound passenger boards the same tram in the 30 seconds or so allotted to board while other passengers disembark at the same time for each tram. Response: 30 second dwell times are common for rail systems across the country. Doors will have sensors that will prevent them from closing on a person.	**Daisy Murai**		Time it takes for passenger boardings is questioned.	Yes	No

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152	7/20/10 letter	Will passengers need to pay each time they park their vehicles in the Park & Ride, then the Tram and finally the bus circulators to reach their destinations or will there be a single charge? Will the single charge be fair to passengers finding their own way to the Transit station or center, ride the tram and get off at another station, but will not need to ride bus circulators to reach their final destination Response: At this time, the City does not plan to charge for parking at park-and-ride facilities. All monthly passes for the bus will also be accepted on the train. Those paying a cash fare on the bus or train will receive 1 transfer.	**Daisy Murai**		Will patrons be charged for park and ride and bus service in addition to rail service?	Yes	No
153	7/20/10 letter	The Drive time when UH Manoa is in session, is only about 10- 20 minutes longer or 55 -70 minutes in heavy traffic. This is just 3 - 28 minutes longer than if one is to travel by the City's elevated Rail System to Ala Moana Center as mentioned in the EIS. This is the 42 minutes RAIL	**Daisy Murai**		Travel time to destinations may be longer.	Yes	No

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		TRAVEL TIME ONLY and does not account the time needed to Park your vehicle in the Park & Ride Facilities, go up (30 to 80 feet –at Ala Moana Center) to the Boarding Platform to catch the Trams to your station, go down to the ground floor to catch bus circulators to your final destination. Response: Figure 3-7 in the Final EIS shows travel times door to door. As shown, travel times will be much shorter in 2030 with the project versus without. Elevators and escalators will be provided at stations.					
154	7/20/10 letter	I feel this will take much longer than riding the Current City's TheBus, City & Country Express Bus services by the City, other private Express Bus services, being dropped off or even by driving our own private vehicle(s) to reach Downtown Honolulu from the Westside. Response: Buses and cars are stuck in roadway congestion, which will get worse between today and 2030. Currently many buses do not arrive on time as a result of this congestion.	**Daisy Murai**		Travel time will take much longer.	Yes	No

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		However, the rail system will be elevated. As a result, congestion will not impact the train schedule. This means a trip from East Kapolei to Ala Moana Center will always take 42 minutes, regardless of what occurs on the surrounding roadways.					
155	7/20/10 letter	I notice that during Rush Hours both in the morning & afternoon, the buses do have standing room only on their routes, but not all buses in circulation are packed to capacity. If the first bus is crowded, I know there will be other buses following and heading towards Kahala Mall, University of Hawaii, Waikiki, Salt Lake, Ala Moana Center, Liliha, Kailua, Kaneohe, and other destinations. I just wait a few more minutes for the following bus or two at the bus stop, thus avoiding standing and being crushed like sardines in the very first bus on that route. I also notice the number of passengers significantly decrease after or before Rush Hour. The City's Mass Transit System is one of the Best world-wide, as I have heard passengers from other States and Country mention how fortunate Oahu	**Daisy Murai**		Bus service is adequate now (without rail).	Yes	No

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		is to have 365 days of bus service - even on Sundays and Major Holidays. Response: Comment noted.					
156	7/20/10 letter	These are the reasons I feel the City's High Capacity Mass Transit is not the ideal solution to Oahu's traffic Congestion till 2030 as expressed in Final EIS. In 2030, there will be thousands of the Baby Boomers retired and not needing an elevated Rail Transit. Response: Those baby boomers will need a way to travel to reach doctor appointments, shopping destinations, and conduct other errands. Many of these retirees will be unable to drive. This transit system provides an alternative.	**Daisy Murai**		Rail project not right for Oahu.	No	No
157	7/20/10 letter	The Transit Oriented Developments at the Rail Stations and Centers as well as the power stations along the route, may enhance or destroy the Communities it passes through, especially if existing buildings and establishments are displaced for the Rail Alignment. The State will have several traffic congestion projects in place, as well as the City's Traffic	**Daisy Murai**		Community impacts due to TOD possible.	No	No

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		Management Center will be in full operation to detangle traffic gridlock. Response: The Draft and Final EIS included many state and city transportation projects. As shown traffic congestion will be much worse without the system. Additionally, this project only acquires 40 full properties and since the system is elevated it will have a smaller impact on communities.					
158	8/25/10 Letter	We reiterate that the Final Environmental Impact Statement must include an archaeological inventory survey, including subsurface testing, of all areas where (1) stations could be located (b) support pillars could be located and (c) existing underground infrastructure will be moved. Response: The statement is an inaccurate interpretation of the Hawaii Chapter 343 law, the City will conduct ~~but in fact,~~ an AIS ~~will be conducted~~ before construction begins in each segment of the project in accordance with the Programmatic	**Native Hawaiian Legal Corp.,** David Frankel		FEIS must include results of Archaeological Inventory Survey and subsurface testing.	Yes- During 106 consultation	No

Comment [eaz41]: Could we say that we have a different interpretation of Hawaii law?

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		Agreement.					
159	8/25/10 Letter	Not only is the City flirting with disaster in not performing these necessary studies, but it also risks violating HRS § 6E-8 and 6E-42. These provisions require that prior to commencement of a project, DLNR through SHPD shall give its written concurrence and that prior to approval of a project, SHPD be given an opportunity to review and comment. Response: There is a difference of opinion in the interpretation of the HRS reference in the comment.	**Native Hawaiian Legal Corp.,** David Frankel		Not conducting AIS is in violation of HRS § 6E-8 and 6E-42.	Yes – during 106 consultation	No
160	8/25/10 Letter	The rules that implement these statutory provisions require that an archaeological inventory survey be prepared and accepted before the completion of the historic review process. In other words, an agency cannot expect SHPD to give its written concurrence or to have reviewed and commented on a project until an AIS is completed where there is strong evidence that historic sites exist subsurface - as is this case along	**Native Hawaiian Legal Corp.,** David Frankel		Statutory provisions require that AIS be prepared and accepted before the completion of the historic review process.	Yes – during 106 consultation	No

Comment [eaz42]: As stated in X section of the FEIS, AIS plans have been completed for X phases.

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		the transit corridor in Kaka' ako. There are no provisions in any of SHPD's rules allowing for a "phased approach." Response: There is a difference of opinion in the interpretation of the application of an AIS to a project.					
161	8/25/10 Letter	Some officials appear to believe that compliance with section 106 of the National Historic Preservation Act allows the city to ignore the provisions of HRS §§ 6E-8 and 6E-42. The National Historic Preservation Act does not preempt state historic preservation laws. The city and SHPD must comply with these statutory requirements. Response: No State laws have been ignored in the preparation of this EIS. There is a difference of opinion in the interpretation of the HRS reference in the comment.	**Native Hawaiian Legal Corp.,** David Frankel		Section 106 doesn't allow ignoring requirements of HRS 6E.	Yes	Yes – describe in ROD
162	8/25/10 Letter	Nor should SHPD sit back and wait for the City to come to it for a review pursuant to HRS §§ 6E-8 and 6E-42 - knowing that the City plans to move forward on this project aggressively.	**Native Hawaiian Legal Corp.,** David Frankel		Section 106 doesn't allow ignoring requirements of HRS 6E.	Yes	No

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		SHPD should advise the City of its responsibilities immediately. After all, HRS 6E-l provides that it "shall be the public policy of this State to provide leadership in preserving, restoring and maintaining historic and cultural property." SHPD is required to provide technical assistance to the counties, develop an inventory of burial sites, and regulate archaeological activities. HRS § 6E-3. Because the city appears to be proceeding with its high-capacity transit system without complying with HRS Chapter 6E, this letter is sent pursuant to HRS § 607-25(e)(2)(A). Response: There is a difference of opinion in the interpretation of the HRS reference in the comment.					
163	7/20/10 Letter	It became clearer to me and many taxpayers in my community and throughout the whole region, that the mayor from the onset of his election, had no intention of ever providing an open, fair, transparent,	**Glenn Oamilda**		Value of public participation questioned.	Yes	No

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		up-front and equitable public forum, nor a suitable, acceptable public process for input, discourse, dialogue and discussion on the project. Response: Numerous public meetings have been held since 2005 which ample opportunity for the public to comment on the transit system, including on the technology and alignment.					
164	7/20/10 Letter	Throughout the nearly six (6) years of selling this massive heavy-elevated-rail, the city and the area elected officials had made a formal rail presentation to the 'Ewa Beach community, nor were the citizen taxpayers given the opportunity to openly discuss and dialogue: 1) the up-front estimated of a 6-billion-dollal' price tag, and the after perpetual maintenance cost; 2) universal available technologies, i.e., meg lev, rubber-on-concrete, toll-ways, etc.; 3) the rail transit mode - elevated or surface; 4) the route alignment; and, 5) available local existing infrastructure(s) along	**Glenn Oamilda**		Open dialog to discuss rail project with Ewa Beach community was not made available.	No	No

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		the twenty-two-mile route. Response: There were many meetings held in the Ewa Beach and Kapolei Areas available to all. The DEIS was an opportunity for all to comment on its contents as provided for in NEPA.					
165	7/20/10 Letter	Even in recent years, the Hannemann administration made no gestures or made concerted efforts to reached to all the players in the region to come together in partnership and engage in the planning process with serious and continuous ongoing dialogues, discussions and discourses. Response: The comment is incorrect as evidenced by the number of meetings and public outreach held to gather and share information about this project.	**Glenn Oamilda**		Disappointment in Mayor's lack of outreach in community.	N/A	No
166	7/20/10 Letter	This passive inaction and insensitive display had only heightened and increased public tensions with deepening negative feelings. With on-going psychological pressures, financial and physical stresses, many living in the region had lost sight of that vision, and more so, could not	**Glenn Oamilda**		Disappointment in Mayor's lack of outreach in community.	N/A	No

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		continue to remain positive and hopeful that the initial planned goals of building a second city could ever come to fruition; while others, continue to speak out with confidence for more planning and remain hopeful the 'Ewa plains will sooner than later become the second city, Response: Comment noted					
167	7/20/10 Letter	In reference to the question I asked the mayor about the funding choices between rail and the island's two sewage plants and the transmission lines, it seemed the repairs and upgrades were no big concerns for him. However, just recently, in June, 2010, the Hannemann administration, after spending over 10 million dollars of taxpayers money defying and evading the EPA over waivers and fighting legal battles, settled a contested law suit with federal government that will now cost the already burdened and strapped taxpayers and homeowners over 4 billion dollars. I truly believe that the mayor's financial priorities were then	**Glenn Oamilda**		Disappointment in Mayor's lack of outreach in community and not addressing EDP commitments. Competing cost of rail and sewage issues.	Yes	No

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		and still are simply skewed and misguided. Response: The funds allocated for the rail project cannot be spent on sewers. The sewer improvements will be funded by a different source.					
168	7/20/10 Letter	For the most part, the residents in 'Ewa Beach and the 'Ewa region regard and believe this heavy-elevate rail transit is not and will not be the area's primary form of transportation, but clearly just another alternative mode of moving people around. In my opinion, rail will be just another choice, another alternative offered to the general public, and in all likelihood, people on this O'ahu island, will still choose the automobiles. Response: The comment is inconsistent with public votes on the subject.	**Glenn Oamilda**		When all said and done, people will still choose auto over rail for mobility.	Yes	No
169	7/20/10 Letter	I cannot fully accept the Hannemann administration's decision, motive, nor feel	**Glenn Oamilda**		Rail is not the answer.	Yes	No

Comment [eaz43]: I do not like the way this response is phrased and I am not sure that it is relevant. It implies that there has not been public input on the development of the project.

The project is not necessarily a popularity contest. Can say that the City has been listening and communicating with residents and plans to continue that in the future. For a number of reasons, the City has developed a proposed project that will perform well and improve mobility. Or something along those lines.

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		comfortable and optimistic that rail is the answer; but this administration with a "lone ranger" attitude, has moved full speed ahead, hopeful and confident this proposed heavy-elevated-massive rail project will gain traction and literally get working people out of their automobile. Response: The comment is inconsistent with public votes and evidence from other areas on the subject.					
170	7/20/10 Letter	There is no doubt in 2005, when the incoming mayor Hannemann made a serious pitch for mass transit, it became a top priority on his political agenda; and he aggressively challenged anyone who dare to oppose or even question his motive on how to solve the leeward traffic congestion problems, After his first term in office, the mayor, had shown no interest, gave no indication of redirecting, or further advancing the already approved 'Ewa Development Plan for the second city - the entire 'Ewa region.	**Glenn Oamilda**		Mayor not interested in advancing EDP; his focus is only on rail.	N/A	No

Comment [eaz44]: Revise comment.

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		Response: Comment noted					
171	7/20/10 Letter	Clearly, the Ewa Development Plan (EDP) underscores two (2) important points: 1) In provision 5.1.2 that says .... "the city must take an active role in the planning and coordinating construction of needed infrastructure .... And the development of the regional transportation system ...." and, 2) In provision 2,2,10 .... "as a condition for zoning approval to insure that development does not outpace infrastructure development .... " The EDP specifically contains no language, provision addressing or referring to the heavy-elevated-mass-rail, but only mention an intramodal transportation system circulating within the second city. Response: The EDP is not evaluated in the EIS	**Glenn Oamilda**		EDP does not specify heavy rail project.	N/A	No
172	7/20/10 Letter	If the Hawai'i state government designated the 'Ewa region as the second city, why would the city government transport people via a	**Glenn Oamilda**		Questions logic of project when intent is to build "second city" and have people work/live there.	Yes	No

Comment [eaz45]: Explain further. Was this considered in a landuse review?

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		massive heavy-elevated-rail transit, a 6 billion dollar system, back and forth daily into an already overly crowded Honolulu district? Is this a rational argument for a need to have rail? Even the city's own Traffic Alternative Analysis data makes no strong convincing argument justifying the real need for a pricy rail system. Response: Even with the second city, there will continue to be significant travel between downtown and the second city.					
173	7/20/10 Letter	I reiterate again, as the mayor aggressively pushed his massive heavy-elevated rail project, I personally feel less and less optimistic that rail is the answer, and it will work. This rail project is clearly a unilateral, a one-sided approach, based entirely on assumptions, inferences and suppositions with no hard facts. Response: The EIS and earlier studies present the information on which the decisions for the Project have been	**Glenn Oamilda**		Not optimistic that rail is the answer.	Yes	No

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		based.					
174	7/20/10 Letter	We sometimes, on an occasion or two, like to use jargons, descriptive languages, like "a dog and pony road show," or "a country revival meeting." Honestly, all those meetings I attended were exactly that. They were all just totally controlled exercises – no input on universal alternative available technologies, i.e., meg lev, rubber-on-concrete, toll-ways, etc.; no opportunity to openly discuss the up-front estimated 6-billion-dollar price tag, and the after perpetual maintenance cost; and No consideration on the different rail transit modes - elevated or surface, and mention of any available local existing infrastructure along the twenty-two-mile route. Response: The comment is inconsistent with the experience at the many meetings.	**Glenn Oamilda**		Public involvement meetings are totally controlled exercises and not serious about getting public input on issues.	Yes	No
175	7/20/10 Letter	The mayor cites from its own Traffic Alternative Analysis study that by the year 2030 build out (from start to finish), the public will see an eleven percent (11%) to	**Glenn Oamilda**		Benefits of project are too low to justify project cost.	Yes	No

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		about twenty-three (23%) reduction in traffic. In my opinion, these are sorry and somewhat depressingly dismal numbers, and not totally convinced that public dollars will be wisely spent. All the data contained in the study are not backed up with real facts but rather put together by city engineers and rail experts just as a counter to rail opponents, not a clear-cut justifiable argument for pushing rail. Response: No other option produced the results that the elevated guideway produced. The data are supported by studies and the experience in other communities.					
176	7/20/10 Letter	In my opinion, enforcing provisions of the 'Ewa Development Plan, will drastically lessen the $6 billion dollars estimated projected cost by: 1) consider using the old OR&L existing sugar cane street-level train tracks. The route is being used today as a tour attraction goes westward from 'Ewa's Varona Village station to the Ko'olina Resort, soon to be home for the new Disneyland attractions.	**Glenn Oamilda**		Consider OR&L alignment.	N/A	No

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		The old train tracks runs parallel in the same direction as the city's proposed rail alignment, going in an eastward direction through 'Ewa and meanders along the West Loch shoreline into Waipahu; and, 2) create progressive financial strategies, i.e., tax incentives, tax credits as inducements to business employers to relocate to 'Ewa, and by promoting or persuading to bring with them workers back to the area, greatly reducing traffic congestion and the amount of cars from 'Ewa going to and from town every morning and every evening. Response: The OR&L row is largely unavailable, only serves one side as it exists along the shore for much of its length so it is inefficient and would impact more sensitive resources.					
177	7/20/10 Letter	The ballot referendum approved by O'ahu voters only reaffirmed	**Glenn Oamilda**		Will the rail project be the primary alternate mode	No	No

Comment [eaz46]: Explain further how it is unavailable. This is not consistent with earlier response regarding OR&L.

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		the dire need for another mode of transportation, There are many, many more questions that have not been answered: With the hefty price tag, will this heavy, massive rail system be the primary or an alternate form of transportation? …My sense is that the city is selling heavy rail as the primary mode to replace the automobile, it will never happen. Response: The vote affirmed the use of steel wheel on steel rail technology for Honolulu.			of transportation on Oahu? At expense of auto use?		
178	7/20/10 Letter	Let's consider that a light rail, street-level system will be at least half costly to the taxpayers, flexible enough to be built anywhere, and still compliment the automobile. Furthermore, the elevated rail will be cement columns and piers rising like towers in the sky, permanently built and structures to support concrete platform bays. There will be nineteen (19) of them each	**Glenn Oamilda**		LRT half as costly as rail project and more flexible.	N/A	No

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		with a maximum heights of eighty (80) feet (comparable to a six or seven story building), and a minimum of thirty (30) feet (similar to a two story building), running twenty-three miles, starting at the eastern end of the 'Ewa plains and terminating at the University of Hawai'i in east Honolulu. Response: The EIS explains the limitations of at-grade options.					
179	7/20/10 Letter	Building there permanent elevated concrete structures will destroy the natural scenic view and pristine beauty of the 'Ewa plains; there will be sizable lost of prime agricultural lands; private property will condemned; older people, businesses and communities will be displaced; ancient Hawaiian burial sites and archeological features will be destroyed, and not to mention other environmental, psychological and economic risks that will occur if this heavy rail is	**Glenn Oamilda**		Project will destroy views; loss of prime agricultural land; condemnation and displacements; destruction of cultural resources.	Yes	No

Comment [eaz47]: Provide specific sections and page numbers.

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		built. Response: The EIS addresses the effect on visual resources and views.					
180	7/20/10 Letter	0'ahu homeowners were strapped with a huge 4 billion dollar sewer bill because the city did not comply with the federal EPA; and now, this 6 billion dollar rail bill! Gee wheez, we'll be paying off these two bills until the cows come home! Furthermore, in this terrible economic recession when state and federal revenue projections are at their lowest, it is grossly irresponsible and completely heartless for the Hannemann administration to ask the O'ahu taxpayers to fund this project. I believe the taxpayers in Hawai'i cannot afford this heavy, massive and costly rail system; it's an ill-conceived proposal to just throw hard earned tax dollars at a bad	**Glenn Oamilda**		High cost of rail project to taxpayers on top of EPA mandated sewage treatment costs is a huge tax burden.	No	No

Comment [eaz48]: This comment was about more than loss of views. Expand to address other reseources mentioned.

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		project, with hopes of getting the greatest bang for the buck. Response: The sewer needs of the community are not related to this EIS. Funding for the Project will not come from the same source as will be used for sewer enhancements.					
181	7/20/10 Letter	Lastly, as a resident living on the 'Ewa plains, I cannot for a second sacrifice smart comprehensive planning for a costly, elevated rail that mayor may not work Either we plan for rail, or the second city, or both at once. I'm inclined to do both simultaneously, providing process is an open and a transparent one. Response: The EDP was included as a basis for the analysis that led to selection of rail as the preferred transportation solution.	**Glenn Oamilda**		Cost of rail project too high; need to plan rail with EDP.	Yes	No
182	8/11/10 Letter	I was dissatisfied with the response and found it lacked substantive statements in my opinion. If this	**Kathryn Kupukaa**		Dissatisfied with response to comment.	Yes	No

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		came from professionals and it was thoroughly studied, I would have expected better. Response: Comment noted.					
183	8/11/10 letter	Regarding HOT lanes, their response was there would be improved traffic flow but would increase overall system congestion. It has worked in other large cities like in Tampa,' Sail Diego, and Denver to name a few so why wouldn't it work on Oahu. Even though as stated this alternative was fully evaluated I beg to differ. This alternative was rejected from the very beginning without meaningful reasons. Response: The use of HOT lanes in other communities was for very different reasons. Honolulu does not have any options to the few roadways in existence. The places listed in the comment have choices.	**Kathryn Kupukaa**		Disputes points made on HOT lanes.	Yes	No
184	8/11/10 letter	Also stated was travel lanes along Kamehameha Highway between Aiea and Pearl City in each	**Kathryn Kupukaa**		Questions adequacy of ROW along Kamehameha Highway	Yes	No

Comment [eaz49]: Expand and reference other studies if needed.

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		direction will remain the same. I travel along this corridor, like the several hundreds or thousands of drivers and it's hard to believe there is enough land space to build a huge transit station by Pearlridge Shopping Center…If by building the rail traffic, congestion would be eased, I believe the people would use this corridor on a daily basis and would be more likely to agree to build this. Travel lanes on Dillingham Boulevard as stated will not be taken away. This corridor is busy throughout the day. The engineers must not be aware of the situation and have not sat in traffic on this corridor. Response: There will be congestion during construction, but once built, the Project will give people a choice to take the train while maintaining the existing number of automobile travel lanes. That cannot be done with additional road improvements.			near Pearlridge and Dillingham Blvd.		

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185	8/11/10 letter	In my humble opinion and personal experience, anyone who has lived in the City and County of Honolulu for at least for the last 30 years would have knowledge that we need our automobiles to get around and conduct business. Whether doing multiple errands going to work or school it is by far more efficient. Public transportation cannot compare. Why do you think that 67%'of our citizens use their automobiles to commute into Honolulu. You are in denial if you believe people are going to give up their automobiles. We have express buses and they are utilized during peak traffic hours, however during the rest of the day they are underutilized. It will be the same thing with the rail, it may be utilized 1/3 of the time of operation during peak traffic hours while 2/3 of the time it will be of no use. Response: In fact, people develop	**Kathryn Kupukaa**		Public transportation cannot compare with auto's mobility.	Yes	No

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		their habits relying on their cars because they have no alternative. The existence of an alternative will allow many to change their travel behavior as has been done in many cities that have introduced rail to a previously car-dependent community.					
186	8/11/10 letter	The rail will not ease congestion. The only viable way to ease congestion is to build HOT lanes. We need more highway lanes to ease congestion. Once the citizens know the truth about what HOT lanes could do for our city, I believe they would buy into this alternative and reject the rail. Response: HOT lanes did not improve conditions compared to the fixed guideway.	**Kathryn Kupukaa**		Project won't ease traffic congestion.	Yes	No
187	8/14/10 letter	I am writing to express the concerns and comments Residents A*long the Rail* about the FEIS deficiencies expressed in our October 29,2009 and December 21, 2009 letters to the FTA about the DEIS. The response we received stated that we	**Residents Along the Rail**, James Schlosser, Chairperson	Residents Along the Rail position paper; 10/29/09 ltr to Ted Matley; 12/31/09 ltr to Leslie Rogers	Inadequate response to comments made.	Yes	No

Comment [eaz50]: Reference specific sections in the EIS.

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		did not provide written testimony within the window of time provided by the City and County of Honolulu for public comment, but the issues we stated would be addressed in the FEIS. Our major concerns have not been adequately addressed in the FEIS. We would like to know why. Response: The issues raised were covered in the FEIS based on the applicable information which has been shared with your organization.					
188	8/14/10 letter	Comment #1: The DEIS and now the FEIS are not compliant with the National Environmental Protection Act. The FEIS does not adequately address alternative technologies required in the Notice of Intent (NOI). The FEIS should provide the public with equal evaluations of alternate technologies. Both do not. Response: As explained in Section 2.2.3 of the Final EIS, the NEPA Notice of Intent requested input on five transit technologies. A technical	**Residents Along the Rail**, James Schlosser, Chairperson		Technologies not adequately addressed.	Yes	Describe in ROD

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		review process occurred, which allowed opportunity for public comment. The panel selected steel wheel on steel rail technology by a 4 to 1 vote. Not all alternatives specified in the Notice of Intent must be carried forward into the Final EIS if an alternative is found to be superior to the others.					
189	8/14/10 letter	Why, for example, have 29 of the 30 cities most recently adopting rail selected the light rail alternative? Light rail is a more cost and energy-efficient alternative. We assert the City & County of Honolulu must complete and satisfy all requirements of the Environmental Protection Act in making decisions to address long-term traffic problems and solutions. Response: As discussed in Sections 2.2 and 8.16.3 of the Final EIS, at-grade options were examined during the Alternatives Analysis phase of this project. They were rejected for numerous reasons, including cost,	**Residents Along the Rail**, James Schlosser, Chairperson	Residents Along the Rail position paper; 10/29/09 ltr to Ted Matley; 12/31/09 ltr to Leslie Rogers	LRT chosen in 29 cities.	N/A	No

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		traffic impacts, and greater impacts to properties and burials.					
190	8/14/10 letter	Our concern about the FEIS' failure to comply with the law extends beyond the FEIS' failure to consider alternative technologies. Violations include the City & County Land Use Ordinance Chapter 21-9.60.3 protecting prominent makai view corridors at Maunakea Street and Nuuanu Avenue. Section 21-9.30.3 protects mauka and makai views along Ala Moana Blvd. The elevated rail system proposed by the City & County of Honolulu will cross view planes protected by City & County Ordinance. We believe the mauka-makai view corridors should continue to be protected, as they are now, by law. Response: The EIS covers five technologies. The analysis was completed by a group of experts whose findings were made available for public comment with the DEIS. The mauka-makai views are protected but not to the degree they	**Residents Along the Rail**, James Schlosser, Chairperson	Residents Along the Rail position paper; 10/29/09 ltr to Ted Matley; 12/31/09 ltr to Leslie Rogers	Visual impact not compliant with CCH Land Use Ordinance.	Yes	No

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		prohibit any change. Under any circumstances, the Project will minimize the impact on the view corridors, but will not be able to eliminate all effects.					
191	8/14/10 letter	Comment #2: The DEIS and now the FEIS fail to accurately characterize our Kaka'ako community. The EIS continues to grossly misrepresent our community and the number of residential units between the proposed Kaka'ako and Ala Moana stations as predominantly commercial and industrial (Category 3), with two residential high-rises: 1133 Waimanu and Uraku Tower" (Addendum 01 to the Noise and Vibration Technical Report, June 1, 2010, section 4,27, page 12). In fact there are five residential high-rises adjacent to the guideway in this area: Uraku, Ko'olani, Hawai'ki Tower, 1133 Waimanu and Kamake'e Vista. There are also at least four other high-rise residential buildings in	**Residents Along the Rail**, James Schlosser, Chairperson	Residents Along the Rail position paper; 10/29/09 ltr to Ted Matley; 12/31/09 ltr to Leslie Rogers	FEIS doesn't adequately characterize Kaka'ako community—especially concerning surrounding new developments and related noise implications.	Yes	No

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		close proximity to the guideway: Moana Pacific, 1350 Ala Moana, Nauru Tower and Hokua. A new development between Ko'olani and Hawai'ki Tower will be constructed within the next two years with the 404 Piikoi development to follow. Response: If there are definable inaccuracies in the way the neighborhood is characterized in those can be restated as an appendix to the ROD if the FTA believes it is necessary to properly complete the document. The description of Kaka'ako in the EIS in Section 4.6, Neighborhoods, seems to be accurate. The description of the community is admittedly stated in broad terms and refers to the effect the project will have on it or vice-versa. Any changes of the type mentioned in the comment would not affect the findings in the EIS.					
192	8/14/10 letter	If a technical report cannot accurately count residential buildings and households in a neighborhood, how can it accurately	**Residents Along the Rail**, James Schlosser, Chairperson	Residents Along the Rail position paper; 10/29/09 ltr to	Quality of life impacts are not well addressed regarding noise and vibration.	N/A	No

Comment [eaz51]: Do not understand this response to comments. Again, these responses should be written from the perspective of FTA. This comment does not make sense in that comment.

It also does not answer the question on how we feel about the way

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		assess the impact on our quality of life issues such as noise and vibration? The FEIS does not accurately account for the number of residential units adjacent to the proposed guideway between the proposed Kaka'ako and Ala Moana stations. The FEIS proposes noise mitigation measures for one building, 1133 Waimanu. Beyond that the FEIS does not include a discussion of noise impact or noise mitigation measures for other buildings adjacent to the proposed guideway. We expect decisions about Oahu's traffic problems and solutions based on complete, accurate and current information. Response: Specifications for transit vehicles include wheel skirts, which will reduce noise impacts to high rise buildings along the project alignment. As shown in Figure 4-56, noise measurements were taken at 6 locations between the Civic Center and Ala Moana Center		Ted Matley; 12/31/09 ltr to Leslie Rogers			

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		stations. There were 2 locations that would experience "moderate" impacts and sound absorptive materials will be used near both of those locations. ~~FTA has reviewed the noise analysis.~~					
193	8/14/10 letter	The FEIS is noncompliant in the selected zoning of the Kaka'ako neighborhood and therefore noncompliant with noise reading limitations. We are reminding you of this violation and hold you accountable for your decision. Response: This comment is not clear with regard to exactly what "non compliant in the selected zoning of the Kakaako neighborhood" means. The "violation" cannot be responded to without more information about the concern. If the issue is the description of the neighborhood in the EIS, it was stated in the context of the noise analysis in the Noise Technical Report based on properties affected by the	**Residents Along the Rail**, James Schlosser, Chairperson	Residents Along the Rail position paper; 10/29/09 ltr to Ted Matley; 12/31/09 ltr to Leslie Rogers	Based on land use (zoning), noise analysis results not valid.	Yes	No
194	8/14/10	State Transportation Director Dr.	**Residents**	Residents	Violation of FAA airspace	Yes	No

Comment [eaz52]: Check.

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	letter	Brennon Morioka held the City & County accountable to this rule with the selection of the guideway that violated FAA airspace requirements at the Honolulu Airport and community noise standards under HAR46-11-4. Response: It is not clear which rule is referred to in this comment. The FAA, not the Hawaii DOT caused a shift in the alignment to avoid designated airspace safety restrictions.	**Along the Rail**, James Schlosser, Chairperson	Along the Rail position paper; 10/29/09 ltr to Ted Matley; 12/31/09 ltr to Leslie Rogers	and noise concerns at airport.		
195	8/14/10 letter	Comment #3: Our concerns about long-term solutions to Oahu's traffic problems are based on the principle that good governance demands transparency and up-to-date information with a professional analysis of that information. At a minimum this professional review should include a detailed conclusion of benefits versus costs for each alternative technology and a rationale for the proposed technology solution of choice. Currently the citizens of Honolulu	**Residents Along the Rail**, James Schlosser, Chairperson	Residents Along the Rail position paper; 10/29/09 ltr to Ted Matley; 12/31/09 ltr to Leslie Rogers	Request detailed cost/benefit of alternative technologies studied.	Yes	No

Comment [eaz53]: I do not think this is a correct statement that FAA caused a shift in alignment.

FAA presented information to the City and FTA on what changes would need to be made at the airport to accommodate the required clearance distance at the end of the runways. It was the City's decision, when fronted with the cost and potential environmental impacts of making these changes to shift the alignment over a street.

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		have a proposed rail system that is not based on accurate information, but is based on inappropriate political considerations. Response: As explained in Section 2.2.3 of the Final EIS, the NEPA Notice of Intent requested input on five transit technologies. A technical review process occurred, which allowed opportunity for public comment. The panel selected steel wheel on steel rail technology by a 4 to 1 vote. Not all alternatives specified in the Notice of Intent must be carried forward into the Final EIS if an alternative is found to be superior to the others. FTA has found that the Final EIS fulfills all requirements.					
196	8/14/10 letter	Comment #4: *Residents Along the Rail* urges you to withhold a Record of Decision until (1) the FEIS accurately characterizes our Kaka'ako community and its zoning is corrected, (2) the elevated rail's impact on our community regarding traffic, visual, and noise	**Residents Along the Rail**, James Schlosser, Chairperson	Residents Along the Rail position paper; 10/29/09 ltr to Ted Matley; 12/31/09 ltr to Leslie Rogers	Withhold ROD until issues discussed are included in revised FEIS.	Yes	No

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		intrusions be based on accurate information, (3) the FEIS seriously reviews and publishes its conclusions for alternative technologies as required in the NOI, (4) financial comparisons are prepared and published for the leading technology choices, and (5) all solutions be compliant with Federal and State laws and City & County Ordinances. Response: (1) The EIS correctly describes the Kaka'ako area in Section 4.6, Neighborhoods. (2) The traffic, visual, and noise analysis was based on accurate information. (3) as stated previously, not all alternatives listed in the NOI must be carried forward if an alternative is found to be superior. (4) as a result, financial comparisons did not have to be prepared for the other technologies. The Technology panel requested financial information from those					

Comment [eaz54]: Information on why the alternative does not need the purpose and need of the project would need to be presented in Chapter 2 of the EIS.

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		companies that submitted information during the tech panel process. (5) FTA and the City have found that the Final EIS meets legal requirements.					
197	8/14/10 letter	The Noise and Vibration Technical Report, dated October 1, 2008, section 4.27 states, "Land uses between the Kaka'ako Station and three Ala Moana Center Station are predominantly commercial and industrial (Category 3), with one residential highrise, Uraku Tower." This report is inaccurate. (Uraku is actually in the Ala Moana area, not the Kaka'ako area.). Why does the report fail to identify the other residential high-rise buildings in between these two stations? Response: The information in the technical report is to support the EIS and focuses only on the locations	**Residents Along the Rail**, James Schlosser, Chairperson	Residents Along the Rail position paper; 10/29/09 ltr to Ted Matley; 12/31/09 ltr to Leslie Rogers	Noise analysis based on wrong assumptions and conclusions.	No	No

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		subject to noise levels considered to exceed certain levels. The EIS makes an accurate representation of the Kaka'ako area under Neighborhoods in Section 4.6.					
198	8/14/10 letter	The Notice of Intent filed by the city administration in the federal register identified "five distinct technologies" that would be considered in the DEIS. Yet the DEIS did not provide the public with detailed comparisons of criteria issues as required by the National Environmental Protection Act. Because detailed comparisons of the five technologies were omitted, the following questions remain unanswered: 1. Why were detailed comparisons of the five technologies omitted from the OEIS? 2. How much traffic congestion would be relieved by each technology? 3. The DEIS has a vibration projection for the rapid rail transit system. What are the vibration	**Residents Along the Rail**, James Schlosser, Chairperson	Residents Along the Rail position paper; 10/29/09 ltr to Ted Matley; 12/31/09 ltr to Leslie Rogers	Technologies not properly studied per NOI.	Yes	Yes Describe in ROD

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		impacts for the other four transit systems listed in the March 15, 2007 Federal Register Notice of Intent. 4. What is the cost to build and maintain each technology? 5. How affordable is each technology? 6. Will the ridership cover the operating costs? 7. For each technology, will tax increases be required to supplement the operations and maintenance costs or will these systems be self-sustaining? 8. The rail planned and designed in Puerto Rico by the same company advising the City is reported to be a major disaster. How will the same or similar mistakes of overestimated ridership and under-estimated costs be prevented from reoccurring? Response: As explained in Section 2.2.3 of the Final EIS, the NEPA					

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		Notice of Intent requested input on five transit technologies. A technical review process occurred, which allowed opportunity for public comment. The panel selected steel wheel on steel rail technology by a 4 to 1 vote. Not all alternatives specified in the Notice of Intent must be carried forward into the Final EIS if an alternative is found to be superior to the others. FTA has found that the Final EIS fulfills all requirements.					
199	8/15/10 Letter	Recent reports by FTA and correspondence between FTA and the City clearly indicate FTA's concerns about the robustness of the last-published financial plan for the Project (i.e., Financial Plan for Entry into Preliminary Engineering Submittal, August 2009). The FEIS does not reflect these concerns, and the City continues to contend that the "the rail project is on solid financial footing". Response: The FEIS reflects the	**Richard W. Ubersax**		FEIS doesn't address FTA's concerns about the robustness of finance plan.	Yes	No

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		information submitted as part of the application to enter Preliminary Engineering as is appropriate. FTA does not require an updated financial plan until the project enters final design. The City has provided all the financial information required at this time.					
200	8/15/10 Letter	The Financial Feasibility section (Chapter 7.5) of the FEIS contains substantive changes from the DEIS. Response: The only change was the higher ridership and the associated generation of larger user benefits based on adherence to the FTA's process. There are no other major changes made to this section between the Draft and Final EIS.	**Richard W. Ubersax**		Finance section of FEIS is a significant departure from discussion in DEIS.	No	No
201	8/15/10 letter	Using Section 5307 funds to finance the project represents a significant departure from the DEIS… The downturn in the economy has resulted in a	**Richard W. Ubersax**		Reallocation of Sec. 5307 bus funds to rail project due to GET shortage. Violates spirit of City Ord. 07-001	No	Yes Describe in ROD

Comment [eaz55]: FTA does not permit project sponsors to enter final design until after FTA issues a ROD, FONSI or CE.

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		downward revision in projected GET surcharge revenues by about $300 million. The City now plans to offset the GET deficit ("as necessary") by reallocation of $301 million of federal Section 5307 formula funds from the bus ongoing capital revenues program to the rail program. Although this reallocation may fall within the purview of Section 5307 guidelines and City Ordinance 07-001 [which states that capital cost and interest for the Project "shall be paid entirely from general excise and use tax surcharge revenues, interest earned on the revenues, and any federal, state, or private revenues."], at a minimum this would violate the intent and spirit of the ordinance and would certainly be contrary to what the people of Honolulu have been led to believe concerning funding of the Project. The City has assured that the bus					

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		program will not suffer from this reallocation, but it has not been forthright in disclosing that the resulting shortfall in the bus program will be made up by redirecting funds from other local revenue sources such as property and/or use taxes, or by floating additional GO bonds (which are ultimately paid off with local revenue sources). In essence, use of local funds to replace the 5307 funds that have been shifted from the bus program to the Project is equivalent to spending local-source funds on the Project directly. Response: As stated in Chapter 6, TheBus service will be expanded with the project and capital and O&M costs for enhanced bus service are included in the project budget. Additionally, Section 5307 funds will actually increase as a result of implementation of the Project, which makes it a					

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		reasonable project funding option. Under any circumstances, the City will try to minimize the use of 5307 funds if they are needed, but it is an allowable source and consistent with the intended funding program. Bus service will not suffer in the program as presented.					
202	8/15/10 letter	The City's measure of financial feasibility as stated in the DEIS and FEIS is whether GET revenues and New Starts funding are sufficient to fund the Project. In section 7.5.1 of the FEIS it is stated: "The amount of other revenues required over and above GET Surcharge and New Starts revenues provide a measure of the relative financial feasibility of the Project. Operating costs for the transit system as a whole represent an average of 13.8 percent of the City's annual operating budget between 2019 and 2030 (Table 7-	**Richard W. Ubersax**		Financial feasibility of project is questioned.	Yes	No

Comment [eaz56]: Double checking responses with New Starts.

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		6). The Project represents approximately 25 percent of that amount." The Project is financially feasible based on this measure because it would not require additional funding sources beyond the GET surcharge revenues and Federal Funds." However, according to the Table 6.4 of the FEIS and the August 2009 Financial Plan, $301 million of FTA Section 5307 funds (i.e., "additional funds") will be used to fund the project. By the City's own criteria, a more accurate statement would be: The Project is not financially feasible based on this measure because it would require additional funding through reallocation of FTA Section 5307 formula funds from bus ongoing capital expenditures to fund the Project. Response: The Section 5307 funds are allowable under the financial					

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		plan structure and consistent with the federal and GET surcharge. The funding program meets the criterion of financial feasibility.					
208	8/15/10 letter	Financial Feasibility by FTA's broader criteria: The plan to reallocate 5307 funds to the Project seems to be an expedient solution to balance the financial plan, but in so doing, funds from other public programs will have to be funneled into the bus program to maintain the existing level of bus service. This will undoubtedly affect the level and quality of these other programs. The financial feasibility of the Project needs to be judged against FTA's broader criteria of the City's capacity to provide funding resources "without impacting other necessary City services," (Ref 1, p.17). The City acknowledges that other revenue sources are hard to find: "any capital funding shortfalls ……	**Richard W. Ubersax**		Due to use of 5307 bus funds to pay for rail project, funds from other programs will be needed to fund existing level of bus service.	No	Yes Describe in ROD

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		would need to be covered using additional revenues from other as-yet-unidentified sources" (FEIS 7.5.1). Although the August 2009 Financial Plan outlines several potential sources (summarized in Section 6.3.3 of FEIS), the FTA Financial Management Oversight Consultant has said that "none of these concepts have been developed to the point that would allow their reasonableness to be established." (Ref 1, p. 11) In the absence of any additional funding sources that do not impact other City programs, the City's financial plan must be judged as unsound. Response: There is no expectation that other city funds will need to be used to offset Section 5307 funds. The bus system remains whole and is actually expanded under the rail plan. All the costs					

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		of the transit system (buses, rail, etc.) are included in the cost analysis.					
204	8/15/10 letter	FTA's assessment of Financial Feasibility: While the City contends that the Financial Plan is sound, public reports and correspondence disclosed by FTA indicates that approval to continue beyond PE is tenuous unless the financial plan is bolstered. In FTA's letter to the City granting approval to enter Preliminary Engineering (October 16, 2009)3, FTA alerts the City (p.2) that "Some elements of the current financial plan may not fare well in the stress tests that FTA will apply to evaluate robustness [for entry into final design]. These elements include the projected revenue stream from the General Excise Tax, the diversion of FTA Section 5307 funds from ongoing capital needs of the bus system, and the increasing share of the	**Richard W. Ubersax**		Robustness of current finance plan is not sound and will not allow project to enter Final Design.	Yes	No

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		City's annual budget that is required to fund the transit system. Were this plan submitted today in support of a request of advance the project into final design, its weakness would likely cause FTA to deny the request". Response: This is the process for New Starts projects. As the project moves through the various stages of the work, the requirements become more stringent and the information about the project becomes better defined. While the financial plan used for Preliminary Engineering might not fare well when applying for Final Design, the revenue plan and project costs will be more refined, contingencies reduced a better understanding of how they relate will be developed. The comments by the FTA do not mean the project won't meet the FTA requirements. It only points out the areas that require					

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		additional refinement as the project moves forward.					
205	8/15/10 letter	In FTA's "FY 2011 New Starts Financial Assessment", the Project is assigned a Medium rating for the overall "Project Capital Financial Plan" category. But it is extremely concerning that a Low rating is assigned to the sub-category "Capital Cost Estimates, Assumptions and Financial Capacity" (which comprises 50% of overall rating). This low rating reflects FTA's "concerns about revenues, debt capacity, and the City's capacity to absorb potentially large revenue risks"(p.2). It is further elaborated (p.11): "The major factors contributing to this rating are: (i) material downside risks to the GET surcharge revenue forecast, and consequently the inability to cover all debt service cost; (ii) no net debt capacity; and (iii) lack of information to substantiate the City's capacity to absorb a	**Richard W. Ubersax**		Low New Starts rating for Capital Costs are for good reasons.	Yes	No

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		material amount (up to $535 million) of cost risk. In addition to these concerns, bus capital funding – clearly needed as evidenced by the relatively old age of the bus fleet – depends on a much higher level of Federal funding than has previously been the case." Response: The concern about this factor is recognized, but it is because it is a commentary on the risk potential for a financial plan. The next version of the plan will address the risk element in more detail with more accurate cost estimates and better revenue forecasting. It will satisfy this concern. That is the way the New Starts process works.					
206	8/15/10 Le4tter	These concerns are not reflected in the FEIS. To maintain objectivity, transparency, and credibility of the FEIS, they should be discussed in detail. Response: The FEIS is not a	**Richard W. Ubersax**		Financial plan risks are not adequately addressed in FEIS.	Yes	No

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		financial plan and a financial plan is, in fact, not a requirement of NEPA. Chapter 6 is included to provide information only. The level of detail in the FEIS is, as a result, abridged. For the detail, it is best to review the financial plan.					
207	8/15/10 letter	Competition with other projects for capital funding: With respect to the City's overall capacity to sufficiently fund this project, FTA has appropriately considered other capital needs of the City. FTA should be aware of a pending Consent Decree among the City, the United States EPA, the State of Hawaii, and several environmental groups. The Consent Decree mandates that the City make major upgrades to its wastewater collection and treatment facilities at significant cost. The Consent Decree was approved by City Council on July 14, 2010, and now requires approval by the United States	**Richard W. Ubersax**		City's ability to deal with cost implications of EPA Consent decree on sewer/wastewater treatment and funding rail project called into question.	No	No

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		Department of Justice, the State of Hawaii, and the environmental groups. The City estimates that upgrades of the wastewater collection system will be $3.5 billion (in 2010 $) to be completed in 10 years, and upgrades of the wastewater treatment facilities will be $1.155 billion to be completed in two stages by 2024 and 2035, for a total of $4.655 billion (2010$). The City estimates that the upgrades will be funded by increases in sewer usage fees over the next 25 years by 3-5% annually. The total cost of the projects in inflated YOE dollars is expected to be over $5.6 billion (2% annual inflation rate), and interest expense is estimated to be $1.6 billion (3.96% interest rate). The City administration contends that its constituents can pay for both the rail transit and wastewater projects with minimal financial impact on their families.					

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		Response: The source of funding for the rail project is dedicated to rail and rail only. It cannot be used for sewers. The sewers will most likely be funded by a long term rate adjustment consistent with its enterprise fund provisions.					
208	8/15/10 letter	The financial implications of the wastewater projects on the rail-transit project and on the residents of Oahu should be disclosed in the FEIS. Response: The sewer issues are not related to the rail project in any way.	**Richard W. Ubersax**		Financial implications of costs of both sewer/wastewater and rail projects should be disclosed in FEIS.	No	No
209	8/15/10 letter	It is clear that the City has had to stretch to make the financial plan for the rail-transit project balance. Without additional "as-yet-unidentified" financial resources and the added burden of the sewer and wastewater treatment projects, the City's debt capacity will be overextended, it's bond rating will drop, and an undue financial burden will be put on its residents.	**Richard W. Ubersax**		Additional funding sources need to be identified to avoid drop in bond rating.	Yes	No

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		Response: The sewer issue is unrelated to the rail project. There is no evidence that the city's bond rating will drop because of the concerns you mention.					
210	8/15/10	It is also clear that the planned extensions to Kapolei, UH Manoa, and Waikiki are now unaffordable and in jeopardy. Response: The extensions were never planned to be funded by the current GET surcharge. They will require a new source of funding or an extension on the GET surcharge.	**Richard W. Ubersax**		Guideway extensions are in jeopardy due to no funding sources.	N/A	No
211	8/16/10 letter	The Outdoor Circle (TOC) believes the City and County of Honolulu has failed to provide substantive responses or failed to explain mitigation measures to numerous issues raised in our comments on the Draft Environmental Impact Statement (DEIS) for this project. Response: We cannot respond without specific comments. The	**The Outdoor Circle,** Bob Loy, Director		Insufficient response to comments.	Yes	No

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		intent of the FEIS ~~was~~ is to address the comments received on the Draft EIS.					
212	8/16/10 letter	Concerns for View Planes and Community Intrusion: The FEIS acknowledges most of our concerns over blockage of view planes- that "some view obstruction and changes to views will be unavoidable and substantial." But the FEIS claims these issues will be "most noticeable where the guideway and stations are nearby or in the foreground of views." In the FEIS section 4.8.3 the city explains the nearby visual intrusiveness will be mitigated by community sensitive architectural designs and then softened by a variety of landscaping schemes, tree plantings, etc. The FEIS states that much of the details of this work will be developed in concert with the communities as the project moves forward. Response: These statements are accurate reflections of the content of the FEIS.	**The Outdoor Circle,** Bob Loy, Director			Yes	No

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213	8/16/10 letter	While TOC concurs that some level of mitigation will be achieved through these efforts it will only superficially negate the substantial negative influence of the fixed guideway, transit stations and associated infrastructure on the neighborhoods through which the system will be constructed. Yes, landscaping and architectural detail will help soften the hardscape but it will do nothing to lessen the intrusiveness of the massive guideway and huge stations. Response: The FEIS notes that the guideway will create an adverse effect on some viewscapes. The mitigation proposed is designed to reduce those effects. Not all effects will be mitigated.	**The Outdoor Circle,** Bob Loy, Director		Mitigation will only superficially negate the substantial negative influence of the fixed guideway,	Yes	No
214	8/16/10 letter	The landscape and architectural efforts will not mitigate or in any way lessen the impacts on view planes-many of them protected by existing law. No level of design or landscape can erase the physical, visual barricade being created to mauka-makai views for the entire	**The Outdoor Circle,** Bob Loy, Director		Protection of view planes won't be mitigated by architectural treatments or landscaping.	Yes	No

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		length of the project. Response: The FEIS notes that the guideway will create an adverse effect on some viewscapes. The mitigation proposed is designed to reduce those effects.					
215	8/16/10 letter	In this regard the FEIS fails to offer relief of any kind. And while the most ominous and destructive influences of the transit system will be felt, as the FEIS acknowledges, by those who live and work closest. to the guideway and stations, the obstruction of view planes will impact far more people who are not near the system but whose mauka-makai views-many "protected" by law-will be interrupted for as long as the system remains in existence. Response: The FEIS notes that the guideway will create an adverse effect on some viewscapes. The mitigation proposed is designed to	**The Outdoor Circle,** Bob Loy, Director		View planes protected by law will be interrupted. Mitigation inadequate.	Yes	No

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		reduce those effects. Extensive coverage with appropriate simulations was completed to ensure the effects were fully understood.					
216	8/16/10 letter	The FEIS fails to acknowledge, much less offer adequate mitigation for this damage. These issues must be adequately addressed and true mitigation offered before a Record of Decision can be issued. Response: The FEIS notes that the guideway will create an unmitigable adverse effect on some viewscapes. The mitigation proposed is designed to reduce those effects.	**The Outdoor Circle,** Bob Loy, Director		ROD should not be issued until appropriate mitigation provided to protect views.	No	No
217	8/16/10 letter	Without committing to where plantings will take place or details of landscape designs it is virtually impossible to determine whether the proposed tree planting will mitigate the damage to communities along the route inflicted by tree removals.	**The Outdoor Circle,** Bob Loy, Director		Current mitigation of street trees is inadequate and needs to be more explicit before ROD is issued.	Yes	No

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		In its June 11, 2010 letter to TOC the City acknowledges that it doesn't know whether the Street Trees plans will properly mitigate the impacts on street trees during construction. "If new plantings will not offer equitable mitigation, additional younger trees could be planted that will, in time, develop similar benefits." This statement implies that the city already is aware that its Street Trees mitigation measures are inadequate. Yet it does not state that it will take additional measure, only that additional younger trees could be planted. Only in guaranteeing that additional trees will be planted will the city be offering equitable mitigation. This information should be publicly presented prior to the completion of a Record of Decision. Response: This effort will make					

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		every effort to minimize the impact of the guideway. The comment referenced is as much about the ability to successfully relocate mature trees in some places as it is to the quality of the mitigation provided.					
218	8/16/10 letter	Landscaping Plans: The city has presented limited broad information about how it intends to use landscaping to mitigate the destructive visual elements of the Transit system. However, the more important details of how landscaping will be used to soften the system's visual impacts on neighborhoods will not be known until the "Final Design" after further consultation with local communities. In failing to provide specific details about landscape designs the City has made it impossible to determine the extent of mitigation that will be achieved by landscaping. These details must be publicly presented and their value weighed before a	**The Outdoor Circle,** Bob Loy, Director		Lack of specific details about landscape designs makes it impossible to determine whether mitigation is adequate. Details are needed before ROD is issued	Yes	No

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		Record of Decision is issued. Response: The FEIS notes that the guideway will create an adverse effect on some viewscapes. The mitigation proposed is designed to reduce those effects. The FEIS is developed when there is enough detail to understand the appropriate mitigation though not the exact design specifics. This is consistent with the intent of the NEPA process.					
219	8/16/10 letter	Signs and Advertising: The FEIS states that commercial advertising on the system will be in compliance with State and County laws. However there is no mention of standards or regulations for non-commercial signage, which could be substantial. These issues must be addressed prior to the issuing of a Record of Decision. Response: The general policy of the City is that advertising cannot	**The Outdoor Circle,** Bob Loy, Director		What are standards for non-commercial signage? Standards should be specified before ROD is issued.	No	No

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		be visible outside the vehicles. It could also allow for advertising within the interior of stations.					
220	8/16/10 letter	Utility Lines: The FEIS does not address questions raised in TOC's DEIS comments regarding the relocation of high voltage transmission lines along Kamehameha Highway in Aiea as mitigation for the disastrous loss of scenic mauka-makai view planes for residents mauka of the Transit line. Instead, no specific mitigation for the view plane loss is offered. This shortcoming must be corrected before a Record of Decision is issued. Response: The high voltage lines are already in place and are not a part of the rail project. Relocation would be by HECO and a betterment not fundable by rail money.	**The Outdoor Circle,** Bob Loy, Director		No response to whether high voltage transmission lines along Kamehameha in Aiea will be done as mitigation.	Yes	No
221	8/25/10	DBEDT issued a new Oahu	**The League**		Newest population	Yes	No

Comment [eaz57]: This is not a correct statement. If it is deemed that relocating these high voltage lines was to mitigate adverse impacts of the project, FTA funding could be used.

To what extent did the City look into relocating the high voltage transmission lines?

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	letter	population projection in January, 2008 (attachment # 2). Its revised projection for 2030 is 1,080,700 which is 36,500 less people than the 2004 projection forecast. DBEDT in 2009 (attachment # 3) again revised its population projections. They project the 2030 population to be 1,017,200 which is 99,635 less than their 2004 projection for 2030. This decrease in the 2030 projected population might have some negative effect on the City's ridership and revenue figures. It is something that Oahu taxpayers should know before the start of the rail construction. Response: The forecasts will change continually, but the changes are small compared to the overall City character and composition. While the population goes down, the employment in the corridor goes	**of Women Voters,** Charles Carole		figures should be used to determine potential change in ridership and revenues.		

Comment [eaz58]: What was the new starts information based on? What forecasts?

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		up. There could be a small loss of ridership. It is small because the two demographic changes offset each other.					
222	8/15/10 letter	Next, look at the annual growth rate (%) for Honolulu in the three sets of DBEDT population projections taken from attachments # 1 to 3. You notice that the annual growth rate decreases when you go from the 2004 to the 2009 projections. The annual growth rates from 2010 to 2030 in the 2009 population projections is higher than 2005 - 2010 annual growth rate of 0.3%. We question the higher annual growth rates for 2010 to 2030 in the 2009 projection series. Response: The island population continues to grow even if more slowly. Projected ~~R~~ridership is still very high and the project offers the same benefits.	**The League of Women Voters,** Charles Carole		Annual population growth rate decreases in DBEDT's recent projections compared to Project's assumption.	In comment response letter.	No
223	8/15/10 letter	The U.S. Census Bureau annual population estimates from 2000 to	**The League of Women**		DBEDT changed its growth projections based	In comment response letter	No

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		2009 for Honolulu County (attachment # 4) caused DBEDT to change Its population projections in Jan. 2008 and July 2009. Estimates are Usually better than projections. Since the Census figures were much Lower for 2000 to 2009 than DBEDT projections, DBEDT lowered its 2005 to 2010 projections in line with the Census estimates. The growth rate of the Census population estimates from April 2000 to July 2009 was 3.6% as indicated in attachment # 4. As a worst-case Scenario, if population growth to 2030 were to continue at the same Rate of 3.6%, then the 2030 population would be 978,667 which is 136,533 less than the FEIS population for 2030. Response: The island population continues to grow even if slightly more slowly. Ridership is still very high and the project offers the	**Voters,** Charles Carole		on U.S. Census data—why doesn't Project do same?		

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		same benefits.					
224	8/15/10 letter	The City DTS is using the Aug. 2004 Projections and the City Department of Planning and Permitting (DPP) Page 3 August 25,2010 Honolulu Rail FEIS is using the July 2009 projections as shown in their 2008 Annual Report published in December 2009 (attachment # 5). Now, we have a situation that DTS is not consistent with DPP, DBEDT and the Census Bureau. Response: The model was developed with the latest information at the time. The changes made since then do not change the conclusions.	**The League of Women Voters,** Charles Carole		DTS' population numbers are inconsistent with DPP, DBEDT and Census.	In comment response letter	No
225	8/15/10\III letter	How much trust can you have in the DTS projections? Can this trust or mistrust extend to their ridership and revenue projections? Response: DTS prepares the detailed forecast by traffic analysis	**The League of Women Voters,** Charles Carole		No trust in DTS's projections.	In comment response letter	No

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		zone. Those are not available from DBEDT. Only a few of the zones change with the revised forecast.					
226	8/15/10 letter	Now, consider the DBEDT breakdown of total resident population by 5-year age group, 2005-2030, as shown in attachment # 6.You notice under the last column of the attachment, Age Group Change, the greatest increase between 2005 to 2030 occurs in the 65+ group, with a smaller increase in the 0-19 group. However, in the 20-64 group, there was a decrease of 3,316 persons. Not a good omen for DTS ridership and revenue projections for 2030. Response: The older age group is more likely to ride transit than any other.	**The League of Women Voters,** Charles Carole		Ridership projections in question due to age-group projections.	No	No
227		Since this FEIS is the last chance for Oahu taxpayers to comment on			A better ridership and revenue projections should	Yes	No

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		this project, a better ridership and revenue projections should be given in this FEIS. Maybe, these figures could be given in a supplemental EIS. Response: The EIS was prepared consistent with the requirements of the FTA and NEPA as well as Hawaii Chapter 343. The changes alluded to do not materially affect the results or conclusions. The project is still the most realistic option for Honolulu compared to the alternatives.			be given in this FEIS.		
228	8/26/10 Email	We support completing the rail project ASAP, as approved by the Honolulu City Council. This EIS and numerous previous studies confirm the obvious. Response: Comment noted	**Daniel Walker**		Supports project	N/A	No
229	8/26/10 email	We do not support the other options studied for many, many years, including bus, TSM, managed lanes, mag lev, monorail, or no-build alternatives.	**Daniel Walker**		No more studies needed on other alternatives and technologies.	N/A	No

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		The time for re-studying alternatives has ended; now, it is time to build this project. Response: ~~The most immediate decision is now in the hands of the Hawaii Governor's Office~~Comment noted.					
230	8/26/10 email	The Federal and State EIS document do not meet federal and Hawaii State requirements and standards for accepting a Final EIS. 1) The final EIS was not responsive to my comments and comments made by others, providing boilerplate information already available and not directly responding to comments. Response: The comment responses for any particular subject were prepared to be consistent with each other. If there was not a substantive difference in a letter, it was given the same treatment, as is	**A. Lono Lyman**		Response to comments not adequately responsive.	Yes	No

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		appropriate.					
231	8/26/10 letter	The Final EIS did not respond to comments in the final paragraph of my comment letter. Response: The Draft EIS was prepared in accordance with HAR 11-200-17. It was determined to be acceptable by the accepting authority. Additional detail was added to the Final EIS to address cumulative and indirect impacts, and the indirect effect of the project on growth. The list of permits and approvals was updated and an appendix was added to document the previous study of the relationship of the project to existing land use plans, policies and approvals.	**A. Lono Lyman**		No response to comment in DEIS.	Yes	No
232	8/26/10 letter	Accepting the Final EIS as it has been prepared will lower the standard for how comments are responded to in Final EIS documents; with the new standard being that a response was made	**A. Lono Lyman**		Poor response to comments will lower standards.	No	No

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		and not that a response was adequate. Response: All responses were prepared to address the comments as well as could be given the information provided in the comment and the information developed on that particular subject for the EIS. The responses were considered adequate and responsive.					
233		Blank					
234	8/26/10 letter	The Final EIS contains information, data, and analysis not made available through the draft EIS, and by doing so it thwarts public and public agencies reviewing and commenting on EIS information, data, and analysis, as listed below. Response: The intent of the DEIS is to generate such new or additional information so that it can be added when appropriate to the FEIS in response to public or	**A. Lono Lyman**		New information and analysis found in FEIS thwarts public and agencies ability to review and comment appropriately.	Yes	No

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		agency comments.					
235	8/26/10 letter	Example 1: After the draft was published, the consultants realized they needed to do a 4(f) review for two parks. Response: Those comments were made during the DEIS review period and properly responded to in the FEIS.	**A. Lono Lyman**		New information found in FEIS should have been included in DEIS.	Yes	No
236	8/26/10 letter	Example 2: After the Draft EIS was published it was revealed that the alignment in the draft conflicted with the Honolulu International Airport runway and the alignment was changed. Response: The requirement for the clearance at the airport was inconsistent with the adopted Airport ALP on which the rail alignment was developed. The FAA required that the alignment provide additional clearance leading to a slight modification in the alignment. This was reviewed by both FTA and FAA and found	**A. Lono Lyman**		New information found in FEIS should have been included in DEIS.	Yes	No

Comment [eaz59]: See earlier comment on FAA language regarding the alignment shift at the airport.

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		to be an appropriate change not requiring a supplemental document given the circumstances.					
237	8/26/10 Letter	Example 3: The planning consultants for the project increased the ridership projections in the Final EIS document. Response: The ridership changed in response to FTA process. No additional impacts resulted from the change.	**A. Lono Lyman**		New information found in FEIS should have been included in DEIS.	Yes	No
238	8/26/10 letter	These examples, and there are others, of information, data, and analysis that should have been available in the draft EIS document. Response: Comment noted.	**A. Lono Lyman**		New information found in FEIS should have been included in DEIS.	No	No
239	8/26/10 letter	Accepting the Final EIS, as it has been prepared will lower the standard for adding new information in the Final EIS and avoiding public review of relevant information, data, and analysis. Response: The process is designed to allow the Federal agency and	**A. Lono Lyman**		Avoidance of pubic review of relevant information.	No	No

Comment [eaz60]: Explain. I am not sure what this means.

Comment [eaz61]: The comment response should be expanded. FTA evaluated the shift in the alignment and determined that there would be no new significant impacts. Because there was a changed, FTA invited public comment on the FEIS on those changes.

Information on the shift in the alignments and reasons for the shift are fully discussed in the FEIS on X pages/Sections.

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		project proponent to update and refine information as it becomes available during and after the DEIS review period.					
240		The consultants who prepared the EIS do not understand the Hawaii State EIS requirements set forth in HRS 343, applicable agency administrative rules, and applicable administrative and judicial rulings. The State of Hawaii has rejected final EIS for minor shortcomings. If this EIS is accepted, I expect that the Courts will overturn the acceptance of the Final EIS. Response: HRS Chapter 343 is properly addressed in the document as well as NEPA.			Requirements of HRS 343 not understood. Likely Courts will overrule FEIS acceptance.	No	No
241	8/26/10 email	The steel on steel rail technology chosen will create a huge amount of noise. To mitigate this noise the city is planning to build a 3 foot barrier on each side of the track all along the length of the track. This mitigation plan will only shoot the	**Robert Rodman**		Noise impact due to steel on steel technology. Mitigation of 3' foot barrier won't mitigate.	Yes	No

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		sound upwards and impact thousands of residences in towers which line the track and the barrier will add to the visual curtain created by the track. This is unacceptable. Response: This comment is inconsistent with the analysis of noise from the proposed system					
242	8/26/10 email	Other technologies such a magnetic levitation systems, one of which is in operation in China and being extended by 125 miles, and others which are now being planned for the Washington, D.C. / Baltimore Corridor, and the corridor from L.A. to Las Vegas show that this technology is ripe. This technology would eliminate the majority of noise from a planned Honolulu Mass Transit System. Response: MAGLEV was evaluated prior to and as part of	**Robert Rodman**		Other technologies would be quieter than steel on steel.	Yes	No

Comment [eaz62]: Need to go through and explain why it is inconsistent rather than just say that it is inconsistent. Cite specific pages in the EIS and technical reports.

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		the DEIS and was found to be incompatible with the needs and financing ability of Honolulu.					
243	8/26/10 email	The Plan also terminates at the Ala Moana Shopping Center and all the studies show that the ridership will only lessen traffic on the Freeway if the system goes to the University of Hawaii Manoa and to Waikiki. Response: Ridership forecasts of 116,000 a day are based on a line ending at Ala Moana Center. The decreases in traffic congestion shown in Chapter 3 of the Final EIS reflect the rail system from East Kapolei to Ala Moana Center.	**Robert Rodman**		Rail line should extend to UH-Manoa and Waikiki to ensure ridership.	No	No
244	8/26/10 email	This is just a waste of money and a horrible environmental scar on the Island of Oahu if the system does not go to these two major destinations; 50,000+ students attend the UH and 20,000+ workers travel to and from Waikiki daily.	**Robert Rodman**		Rail line should extend to UH-Manoa and Waikiki to ensure ridership.	No	No

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		Response: It will go to these locations when funding becomes available. Until that time, bus service will be expanded to these destinations.					
245	8/26/10 email	The huge stations proposed in the existing plan will just be magnets for the homeless without needed bathroom facilities for them or for the transit users. Response: Stations are planned to have security and bathrooms (though an attendant will provide access to the bathrooms.)	**Robert Rodman**		Large stations will encourage homeless.	No	No
246	8/26/10 email	These many huge stations (there are 2.3 times as many stations planned for this heavy rail system in Honolulu as is typically found on heavy rail systems in other American Cities) will create visual blight throughout our community. Response: The number of stations is similar to other systems throughout the country and the	**Robert Rodman**		Stations will create visual blight.	Yes	No

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		world. Typical urban rail systems normally accommodate stations at about a one-mile separation. The EIS addresses the visual impacts of the project and recognizes there is an impact that cannot be completely mitigated.					
247	8/26/10 email	A station plan such as exists in Portland, Oregon where all the stations are at ground level would eliminate the environmental visual blight of all these huge stations – and eliminate approximately 2 billion dollars of cost from the project – giving funds to extend the line to the UH and Waikiki. Response: The reasons for not building an at-grade rail line have been thoroughly discussed in the EIS (Chapters 2 and 8).	**Robert Rodman**		At-grade stations would eliminate visual blight and cost will be lower.	Yes	No
248	8/26/10 email	The three stations planned for downtown Honolulu are located less than 2 blocks apart. This is environmentally unexceptionable as they visually block views of the harbor.	**Robert Rodman**		Views of harbor blocked due to closely spaced stations downtown.	Yes	No

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		Response: The separation of the stations in the downtown is about a half mile. This is also typical of systems in the most built-up portions of the urban area. The EIS addresses the visual impacts of the project and recognizes there is an impact that cannot be completely mitigated.					
249	8/26/10 email	The 8 to 12 escalators required for each of the planned 30 in the sky stations is too much maintenance for the city to pay for when they now can't afford to keep the simple bus stops clean all around the city – many are constantly filthy with spilled soda and nasty as are the fleet's bus windows and many many of the bus seats. Response: There are 21 stations and no station will have 8 to 10 escalators. At most, the number will be limited to one or two in addition to elevators (required by	**Robert Rodman**		Maintenance cost too high.	No	No

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		ADA) and stairways. The costs of operation of the system include the cleaning and maintenance of the vehicles and stations.					
250	8/27/10 email	I will ride the rail system, and many current car Commuters will do the same. Response: Comment noted. ~~and is consistent with forecasts.~~	**Dale Moyen**		Will ride rail if built.	N/A	No
251	8/27/10 email	We need to have a rail option to the commute from West Oahu to Honolulu, and WE NEED IT NOW! The reverse commute from Honolulu to West Oahu is just as bad. Every year the commute times get worse and longer. The H1 commute is NOT sustainable even if multiple lanes are added, or an Express Viaduct. The cars still have to go onto city streets at the end of the Viaduct. Buses just add to the problem and have to sit in the same traffic. Response: Comment noted.	**Dale Moyen**		Need rail now.	Supports Project	No
252	8/27/10	To address the concerns about	**Dale Moyen**		As an alternative, build	Yes	No

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	email	aesthetics / blockage of view planes and steel wheel noise, why don't we implement a Monorail system like Las Vegas and Disney? The single rail and rubber wheels would solve those 2 concerns and would attract ridership like a ride at Disneyland. Plus, with Disney building their Resort at Ko'Olina, maybe they would cost share to bring the Monorail all the way to Ko'Olina! And what a promotional opportunity that would be for their new Disney Resort. Response: The monorail was one of the technologies considered during the preparation of the draft EIS and was rejected based on its performance characteristics (reliability and cost) and history.			monorail to deal with view blockage and aesthetics.		
253	8/27/10 email	The Stations MUST have Park & Ride lots with large enough parking capacity for people like me to drive to the lot and ride the train. The bus does not come into	**Dale Moyen**		Stations must have park and ride.	Yes	No

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		my neighborhood. I would have to walk a mile, catch the small HandiVan type bus to Kapolei, and then transfer to another bus to the Kapolei station if there is no Park & Ride there. Without large Park & Ride lots, rail will not attract daily H1 commuters like me. Convenience is key to success. Response: Four stations on the line, most at the west end of the project will have park and ride facilities. Park-and-ride facilities will be located at the East Kapolei and UH West Oahu Stations.					
254	8/26/10 letter	We detailed our objections to the biased way that the City and Parsons Brinckerhoff evaluated the Managed Lane Alternative (MLA) in Part I of our Draft EIS comments to the FTA on February 6, 2009. These comments remain valid for the Final EIS since the City has yet to "rigorously	**HonoluluTraffic.com,** Cliff Slater		Managed lanes analysis was biased.	Yes	No

Comment [eaz63]: Another reviewer taking a second look at these responses.

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		analyze" the issues we raised in our comments. Response: This has been thoroughly addressed in the AA and the FEIS.					
255	8/26/10 letter	The MLA was not "fully evaluated" since the City failed to consider the improvements suggested by the City Transit Task Force in 2006. In particular, it ignored the suggestions of the Task Force regarding the zipper lane. The Task Force Final Report made it clear that there was inadequate study of the Managed Lane Alternative, Response: That is not consistent with the findings of the task force.	**HonoluluTraffic.com,** Cliff Slater		Managed lanes alternative not fully evaluated.	Yes	No
256	8/26/10 letter	The Report's Appendix 3, "Suggestions for further development of the Managed Lane Alternative," written by the former Chief Counsel of the USDOT's Volpe Center, David Glater, acting as the Transportation Analyst for	**HonoluluTraffic.com,** Cliff Slater		Task Force expected suggestions concerning managed lanes would be adopted in Draft EIS process but wasn't.	No	No

Comment [eaz64]: Expand.

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		the Task Force, concurs in finding an under-engineering of the Managed Lane Alternative since it produced the list of suggested modifications attached to the report as Appendix 3. From this it is obvious that Mr. Glater expected these modifications to be adopted in the Draft EIS process. Response: The Managed Lane has been studied repeatedly in the AA and the EIS.					
257	8/26/10 letter	The City and Parsons Brinckerhoff ignored these and all other the recommendations of the Task Force regarding the Managed Lane Alternative and omitted from the Draft EIS and the Final EIS any mention of the Task Force, or its Final Report, or the highly relevant questions it posed. We believe this violates the rule that, The Council on Environmental Quality (CEQ) requires the data and analyses in an EIS are commensurate with the importance	**HonoluluTraffic.com,** Cliff Slater		City and its consultants ignored Taskforce recommendations.	Yes	No

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		of the impact. Response: The Managed Lane has been studied repeatedly in the AA and the EIS.					
258	8/26/10 letter	First, the City Response gave no reasonable explanation as to why the City removed the zipper lane in the Managed Lane Alternative (MLA). They wrote, *Zipper lane: As discussed in the Chapter 5, Alternative 3b of the Detailed Definition of Alternatives Report (2006), the reversible lane Managed Lane Alternative provides three managed/HOV lanes in the peak direction, which is sufficient to satisfy the demand for restricted lanes. Eliminating the zipper lane frees up two off-peak direction lanes, one HOV and one general purpose lane. In other words, it was not needed to accommodate the demand in the eastbound direction. (City Response, p. 9).* The City's contention that, "… three managed/HOV lanes in the	**HonoluluTraffic.com,** Cliff Slater		No discussion on why zipper lanes were removed from Managed Lane Alternative.	Yes	No

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		peak direction is sufficient to satisfy the demand for restricted lanes" is nonsense since demand is a function of price, and Managed Lane toll prices were to be varied to control demand. Response: The Managed Lane has been studied repeatedly in the AA and the EIS. The statement quoted shows that the explanation for zipper lane removal was documented.					
259	8/26/10	If demand threatened to decline, the toll price was to be dynamically reduced, to zero if necessary, to maintain demand. It is ridiculous to posit that, at the height of the rush hour, there could be insufficient demand on the H-1 with a zero toll price. Response: The Managed Lane has been studied repeatedly in the AA and the EIS. The comments above are inconsistent with the findings of the study regarding tolls.	**HonoluluTraffic.com,** Cliff Slater		Demand for HOT would not drop due to toll price	Yes	No

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260	8/26/10 letter	The City Response to our concerns about their MLA cost projections, especially when compared to H-3, was as follows, *If construction of the H-3 Freeway had begun in 2006, that project would have cost approximately $2.6 billion.* (City Response, p. 10.) We agree; that amount is the same as the projected cost of the Managed Lanes Alternative. Response: The Managed Lane has been studied repeatedly in the AA and the EIS. The proponents have suggested the cost would be under $1 million.	**HonoluluTraffic.com,** Cliff Slater		Managed lanes cost projections.	Yes	No
261	8/26/10 letter	However, H-3 consists of four lanes while the MLA is only two lanes wide. Therefore, the cost per lane mile is twice as much for the MLA as the H-3. The City Response added, *In addition, both the H-3 Freeway and the Managed Lane Alternative face unique situations that affect cost estimates. Construction of the Managed Lane Alternative would*	**HonoluluTraffic.com** Cliff Slater		Disagrees with assumed cost per lane mile of Managed Lanes Alternative and assumptions on utility and traffic disruptions of this alternative.	Yes	No

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		have occurred in a heavily developed corridor. As a result, there would be substantial disruptions to traffic and utilities, both of which add to the time, and thus cost, of a project. The H-3 Freeway was built in an undeveloped part of the island and while it had its own challenges, expensive traffic and utility disruptions were minimal. This is not necessarily so. The Tampa Expressway is remarkably similar to the MLA in that much of the route was planned to use the median of Nimitz and Kamehameha Highways. The Tampa Expressway was built with a minimum disruption because of the construction methodology employed. Response: The Managed Lane has been studied repeatedly in the AA and the EIS. The Tampa project has been shown to bear little comparison to the MLA in Honolulu.					

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262	8/26/10 letter	The City has not made a credible scientific argument as to how their $2.6 billion estimate for the Managed Lanes construction cost squares with that amount being twice as much per lane mile as the H-3 freeway, currently the nation's most expensive highway. The real cost should be less than $1 billion, which would still be more than twice as much as current costs in Florida. Response: The Managed Lane has been studied repeatedly in the AA and the EIS. Costs for the MLA were developed using the same assumptions used for the fixed guideway. If the MLA is lower, then so too should the fixed guideway be.	**HonoluluTraffic.com** Cliff Slater		Cost estimate used for Managed Lane Alternative not well made.	Yes	No
263	8/26/10 letter	The City Response did not address our concerns of their inflated operating costs caused by projecting a 50 percent increase in buses over those projected for the No-Build Alternative while only	**HonoluluTraffic.com** Cliff Slater		Assumptions not explained on use of inflation cost.	Yes	No

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		projecting a 5 percent increase in riders over the No-Build. They made no attempt to justify that 5,400 park-and-ride stalls for the Managed Lane Alternative, with their attendant costs, was at all necessary. They did not attempt to provide facilities to reduce traffic congestion at the downtown terminus of the Managed Lane Alternative. Response: The Managed Lane has been studied repeatedly in the AA and the EIS. The MLA did not attract significant additional ridership despite better service being provided. The park-and-ride spaces would actually improve the likelihood of transit being used. The costs of those factors are small compared to the overall project cost, but they did not help.					
264	8/26/10 letter	Had the City used reasonable cost estimates and reinstated the zipper	**HonoluluTraffic.com** Cliff		Managed lanes would have been favorable if	Yes	No

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		lane it is quite clear that the MLA would have outperformed the heavy rail line. Response: The Managed Lane has been studied repeatedly in the AA and the EIS. Based on a common foundation of project definition, the fixed guideway results were far superior to the MLA.	Slater		reasonable cost estimates were used.		
265	8/26/10 letter	In evaluating alternatives one of the more important legal requirements is the avoidance of historic properties, including burial grounds. The Section 4(f) statute requires transportation projects to be evaluated at the alternatives analysis stage with an injunction to avoid historical properties if at all possible. Section 106 calls for alternatives to be studied for their effects on historic properties in the early stages of planning before the alignment is chosen (See Section 106, § 800.1(c) above). Yet the alignment chosen by the City and	**HonoluluTraffic.com** Cliff Slater		Legal requirements on analyzing and avoidance of historic resources per Section 4(f) must be done in Alternatives Analysis phase.	Yes	Yes Describe in ROD

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		FTA was evaluated in the Alternatives Screening Memo as, "… this elevated alignment would have sev*ere visual impacts for Aloha Tower and should be avoided if there are other viable alternatives."* And the Alternatives Analysis (p. S-3) stated that, "Compared to the other alternatives [No-Build and MLA], the Fixed Guideway Alternative would require more acquisitions and *affect more potentially historic structures …"* Response: The AA does not require a 4(f) analysis. The AA did, however, address potentially affected historic, archeological, park and cultural resources and the alignment preferences were selected based in part on that information. The 4(f) section was developed based on that and further information in the DEIS and FEIS.					
266	8/26/10 letter	Since recommendations for significant improvements to the Managed Lane Alternative had	**HonoluluTraffic.com** Cliff Slater		A new Scoping process initiated without including Managed Lane	Yes	No

Comment [eaz65]: Section 4(f) analysis considers all feasible and prudent alternatives to avoid a use of 4(f) properties regardless of whether they were previously dismissed in AA.

Could say realizing that the project would eventually have to go through a Section 4(f) analysis influences project design from the very beginning of planning.

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		been made by the City Council's Transit Advisory Task Force (Task Force) one would think that such improvements would have been developed, evaluated and then compared with other alternatives both as to transportation outcomes and impacts on historic properties during this Alternatives Analysis phase. Instead, the City dismissed the Managed Lane Alternative without testing the improvements suggested by the Task Force and then called for a new Scoping without including the Managed Lane Alternative or giving any reason for its dismissal. And this occurred despite the Scoping being complete and the requirement that, *Draft environmental impact statements shall be prepared in accordance with the scope decided upon in the scoping process. [§1502.9 (a)* Response: The Managed Lane has been studied in the AA and the			Alternative or giving any reason for its dismissal.		

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		EIS. The proposed changes were not substantially different from the alternatives already tested.					
267	8/26/10 letter	As the EPA commented in February 2009 in its letter to the FTA, "… we have remaining questions about why light rail or bus rapid transit in an exclusive right-of-way were not considered as reasonable alternatives in the DEIS." Source: Draft EIS comments. We need an honest answer as to why the Managed Lane Alternative was not developed further and then studied in the Draft EIS. Response: The EPA is satisfied that their concerns have been addressed.	**HonoluluTraffic.com** Cliff Slater		EPA's comments on why dismissed alternatives not included in DEIS.	Yes	No
268	8/26/10 letter	The 4(f) process appears to have been completed with little or no input from the "officials with jurisdiction." For example, the potential use of land from Section 4(f) properties was not evaluated during the Alternatives Analysis	**HonoluluTraffic.com** Cliff Slater		No input from officials with jurisdiction in Section 4(f) process	No	No

Comment [eaz66]: Cite the specific letter.

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		stage. The closest evaluation of historic properties was the Alternatives Screening Memo issued at the time of the Alternatives Analysis. The Memo does not mention section 4(f) or its requirements to avoid 4(f) properties. Had the Section 4(f) process been followed as required by statute, then a different alternative might well have been chosen that would have avoided the historic downtown area altogether. Response: The 4(f) process was an extensive effort that included "officials with jurisdiction" throughout its development. It is not applicable to the AA.					
269	8/26/10 letter	Why did the FTA official not coordinate the section 106 process with the reviews required by section 4(f) and thus avoid impacting historic properties? Response: The FTA did coordinate	**HonoluluTraffic.com** Cliff Slater		Why weren't Section 4(f) and Section 106 processes coordinated to avoid impacts to historic resources?	Yes	No

Comment [eaz67]: Again, see comment above on Section 4(f)

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		the Section 106 process according to the NHPA requirements. Section 106 only informs 4(f). 4(f) only applies in specific cases which are addressed in the EIS.					
270	8/26/10 letter	The City and PB have tried everything in an attempt to prove that the reason for the second Notice of Intent and second Scoping was legitimate and not merely a subterfuge to eliminate the Managed Lane Alternative. Response: The NOI and scoping were conducted as provided for in NEPA.	**HonoluluTraffic.com,** Cliff Slater		Second Scoping process was subterfuge for eliminating MLA.	Yes	No
271	8/26/10 letter	The City Response to our comments on the DEIS, page 4, discusses the legitimacy of a second scoping process, citing both an FTA 2006 Guidance and the 2006 SAFETEA-LU Environmental Review Process Final Guidance. We can find no discussion in these documents about a second Scoping, let alone a justification for dismissing a	**HonoluluTraffic.com** Cliff Slater		Reasons for second Scoping process questioned.	No	No

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		previously successfully scoped alternative. Further, the Final EIS states that, *"The City Council eliminated the Managed Lane Alternative from consideration when it selected the Locally Preferred Alternative on December 22, 2006." http://www.honolulutraffic.com/Bill79 Final.pdf* This is not correct. At the time of the LPA vote, the City Council understood that, according to the then current Notice of Intent, Scoping Notice and Scoping Report, the Managed Lane Alternative would be studied in the Draft EIS. Only later, with the unexpected issuance of a second Notice of Intent and Scoping Notice was anyone aware that the MLA had been eliminated. Response: Scoping for the DEIS was done in accordance with the requirements of NEPA and did not result in an MLA option different					

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		from that eliminated in the AA. The scoping completed for the AA was conducted to define the alternatives to be studied in the AA and the alternatives that did not perform well were indeed officially eliminated when the City Council adopted the LPA.					
272	8/26/10 letter	In any case the choice of a Locally Preferred Alternative by itself does not eliminate other worthy alternatives from continuing to be studied. The statute is clear that, "until an agency issues a record of decision … no action concerning the proposal shall be taken which would … limit the choice of reasonable alternatives." (§1506.1(a). Response: The statement is correct. The AA is designed to reduce the number of viable alternatives to a manageable number for consideration in the	**HonoluluTraffic.com** Cliff Slater		Selection of LPA should not eliminate other worthy alternatives from being studied.	Yes	No

Comment [eaz68]: First mention whether an alternative meets the purpose and need of a project.

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		EIS by identifying flaws and limitations to meeting the purpose and need. MLA was eliminated on that basis from further consideration.					
273	8/26/10 letter	*Proposals or parts of proposals which are related to each other closely enough to be, in effect, a single course of action shall be evaluated in a single impact statement.* 40CFR1502.4[a] Response: Comment noted.	**HonoluluTraffic.com** Cliff Slater		Segmentation	Yes	Yes Describe in ROD
274	8/26/10 letter	*A problem of "segmentation" may also occur where a transportation need extends throughout an entire corridor but environmental issues and transportation need are inappropriately discussed for only a segment of the corridor.* As stated in Bill 79 (2006)sand Ordinance 07-001: *The locally preferred alternative for the Honolulu High-Capacity Transit Corridor Project shall be a fixed guideway system between Kapolei and the University of Hawaii at Manoa ... with the Waikiki branch ... The city administration is authorized to proceed with preparation of an*	**HonoluluTraffic.com** Cliff Slater		Segmentation since only 20-mile segment of LPA was studied.	Yes	Yes Describe in ROD

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		environmental impact statement for the locally preferred alternative (LPA). Resolution 07-039 defines a shortened minimum operable segment between East Kapolei at the University of Hawaii-West Oahu, near the future Kroc Center, and Ala Moana Center. The second and last Scoping Report, p. 5-3, states clearly that: *Both UH Mānoa and Waikīkī service are included in all fixed guideway alternatives that will be evaluated in the EIS.* However, in the Final EIS, the detailed environmental analysis and documentation applies only to the core 20-mile alignment between East Kapolei and Ala Moana Center. The additions from East Kapolei to West Kapolei and from Ala Moana Center to UH Mānoa and to Waikīkī are described as "future planned					

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		extensions." Response: The UH Manoa, Waikiki and other extensions are addressed in the EIS in the cumulative effects. The project has never had funding for the extensions, so their coverage in the EIS would be premature as long as the project is defined by logical termini, which it is.					
275	8/26/10 letter	The Locally Preferred Alternative should be examined in the EIS in its entirety as was intended by both Notices of Intent and authorized by the City Council. The three "planned extensions" should not have been segmented from the Locally Preferred Alternative in this Draft EIS. As the Corps of Engineers commented for the second Scoping Report, A-10, *The Corps believes the environmental consequences resulting from construction of the "Minimal Operable Segment" and all planned*	**HonoluluTraffic.com** Cliff Slater		Full LPA should have been studied.	Yes	Yes Describe in ROD

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		extensions must be considered in the project-level EIS, particularly if the Project [meaning the LPA] benefits, wholly or partially, are derived from one or more of these future extensions and station locations.[6] We believe that segmentation of what was formerly the Locally Preferred Alternative into a newly designated "Project" (formerly the Minimum Operable Segment and later the First Project) and "planned extensions" was surreptitiously undertaken to avoid the following FTA policy. *... the Federal 'undertaking' in a Fully Funded Grant Agreement (FFGA) will no longer be segmented into Project and Local Activities. All activities related to a Federal undertaking will be identified as the Federal Project. The Federal funds will be distributed among all the activities in the project at a level funding ratio equal to the percentage of Federal financial participation in the entire project. Thus, all the elements and*					

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		activities of the project, as described in the FFGA will be funded, in part, with Federal funds; and, the requirements attached to the use of Federal funds will apply to each such task, unless otherwise exempted as provided in the applicable laws, regulations and policies. Response: The UH Manoa, Waikiki and other extensions are addressed in the EIS in the cumulative effects. The project has never had funding for the extensions, so their coverage in the EIS would be premature as long as the project is defined by logical termini, which it is.					
276	8/26/10 letter	Not segmenting the original Locally Preferred Alternative would mean that the City would get far less federal funds for the Minimum Operable Segment and make the MOS even more financially untenable than it is already.	**HonoluluTraffic.com** Cliff Slater		Analyzing LPA would have resulted in less federal funding.	No	No

Comment [eaz69]: Add that project benefits related to New Starts are only evaluated for the proposed project.

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		Response: The full LPA is not financially feasible with the funding available, so the federal component of the project has always been the 20-mile East Kapolei to Ala Moana portion of the LPA. The federal funds are similarly not contingent on nor have they ever been tied to the implementation of the full LPA.					
277	8/26/10 letter	The lack of any credible rationale in the Final EIS for the City's segmentation of the "planned extensions" from the LPA intimates that the segmentation was done to facilitate funding and acceptance of the Draft EIS since cost and environment issues for the extensions to UH Manoa and Waikiki are proportionally greater than for the Minimum Operable Segment. These combined segments of the project are intended to provide approximately 30 miles of unified rail transit line. The cost and environmental	**HonoluluTraffic.com** Cliff Slater		Rail project is being segmented since extensions were not evaluated.	Yes	Yes Describe in ROD

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		impacts of the integrated project will be significantly greater than the isolated Minimum Operable Segment or "Project" that is specified. Response: The full LPA is not financially feasible with the funding available, so the federal component of the project has always been the 20-mile East Kapolei to Ala Moana portion of the LPA. The federal funds are similarly not contingent on nor have they ever been tied to the implementation of the full LPA.					
278	8/26/10 letter	The UH Manoa and Waikiki extensions will traverse the core urban center of Honolulu creating significant cumulative environmental impacts including prolonged lifestyle disruption due to construction difficulties, excavation of culturally sensitive areas, severe noise impacts through close-quartered residential neighborhoods resulting in great	**HonoluluTraffic.com** Cliff Slater		Impacts of extensions should have been evaluated in EIS.	Yes	Yes Describe in ROD

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		emotional distress, impossible to mitigate visual impacts, and negative impacts on property values within close proximity to the rail line. When several foreseeable similar projects in a geographic region have a cumulative impact, they should be evaluated in a single EIS. Response: The effects of the Project are presented in the EIS.					
279	8/26/10 letter	In 2000, 63 percent of O'ahu's population of 876,200 and 80 percent of its 501,100 jobs were located within the study corridor. By 2030, these distributions will increase to 69 percent of the population and 83 percent of the employment as development continues to be concentrated into the PUC and 'Ewa Development Plan areas. These trends are shown in Figures 1-5 and 1-6, which illustrate existing and year 2030 projected population of 1,117,200 and employment of 632,700,	**HonoluluTraffic.com** Cliff Slater		Use of outdated population & job forecast data.	Yes	No

Comment [eaz70]: Expand.

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		respectively, by transportation analysis area. (FEIS, 1-6.) However, while the state reduced its population forecast in August, 2008, for Honolulu in 2030 to be 1,017,565, a reduction of ten percent from its earlier forecast, the City continues to use the state's earlier forecast. Response: The population and employment will change continually. The latest information available at the time of the analysis was used in preparing the EIS. As far as the changes, the population forecast is lower, but the employment forecast is higher. The two have offsetting effects on the use of the Project and would not affect the conclusions of the analysis.					
280	8/26/10 letter	In addition, we find no reference in the Final EIS to the dramatic change in the composition of Age Groups. The Age Groups of 20 through 64, that constitute those of the working ages, are showing	**HonoluluTraffic.com** Cliff Slater		Need to reconcile that age group data has changed (decreased).	Yes	No

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		a decline. The Final EIS should reconcile these data with those showing significant increases in the working population through 2030 in the Final EIS, Table 4-3. Response: As future travel forecasts are prepared as part of the New Starts process, the data will be updated to reflect more recent information.					
281	8/26/10 letter	Above all what most puzzles us is how a noisy elevated rail line, 40 feet high and 30 feet wide, traversing the most historically sensitive part of Honolulu's waterfront area, and thus opposed by every one of Hawaii's environmental organizations, can be approved as "the alternative or alternatives which were considered to be environmentally preferable." How this can happen? Response: The proposed Project is not noisy compared to existing bus or car noise on the roadways on	**HonoluluTraffic.com** Cliff Slater		Questions how project can be selected as environmentally preferable?	No	No

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		which the rail travels. It is not opposed by all environmental organizations and historic considerations are but one of many considerations on which the decision about the alignment was made.					
282	8/26/10 letter	The following two statements in the Final EIS, taken together make a mockery of the NEPA process. The first statement is that, *While the Project will be environmentally preferable regarding effects on air quality, energy use, and water quality, the No Build Alternative is the environmentally preferable alternative based on overall consideration of the criteria listed in 40 CFR 1505.2(b). The No Build Alternative would affect fewer historic and cultural resources and waters of the U.S., have no visual impact, and cause no displacements. However, the No Build Alternative does not meet the Purpose and Need for the Project. [FEIS, 4-3.]* The second statement is that,	**HonoluluTraffic.com** Cliff Slater		Comparison made between alternatives to determine environmentally preferable alternative.	No	No

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		The purpose of the Honolulu High-Capacity Transit Corridor Project is to provide high capacity rapid transit in the highly congested east-west transportation corridor between Kapolei and UH Mānoa, as specified in the ORTP (O'ahuMPO 2007). [FEIS, 1-21]. In short, although the No-Build Alternative (and, by inference, the Managed Lane Alternative) are "environmentally preferable" they are not eligible as they are not "rapid transit," which FTA defines as heavy rail. So no matter how environmentally preferable a project, if it is not "rapid transit" it will not be preferable? However, that is not consistent with NEPA. To be, *"Consistent with NEPA, the purpose and need statement should be a statement of a transportation problem, not a specific solution. However, the purpose and need statement should be specific enough to generate alternatives that may potentially yield real solutions to the*					

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		problem at-hand. A purpose and need statement that yields only one alternative may indicate a purpose and need that is too narrowly defined.'[23 CFR § 450.336]. Response: The interpretation of the EIS wording does not recognize the Purpose and Need of the project.					
283	8/26/10 letter	The City selectively takes results from official surveys in an attempt to show that O'ahu residents overwhelmingly prefer rail transit to highway improvements. Here is an excerpt from the Final EIS, As part of its work to update the Regional Transportation Plan to the O'ahu Regional Transportation Plan 2030 (ORTP), the O'ahu Metropolitan Planning Organization (O'ahuMPO) surveyed O'ahu residents about transportation issues in 2004. The survey results identified traffic congestion during the commute period in the study corridor	**HonoluluTraffic.com** Cliff Slater		Use of ORTP 2004 survey results not fairly used.	No	No

Comment [eaz71]: Do not understand. Expand.

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		extending from 'Ewa and Central O'ahu to Downtown Honolulu as the biggest concern. By nearly a two-to-one margin, residents responded that improving transit was more important than building more roadways. Seventy percent of the respondents believed that rail rapid transit should be constructed as a long-term transportation solution, and 55 percent supported raising taxes to provide local funding for the system. (FEIS, p. 1-3.) The reader would never guess that the Final EIS excerpt above was describing the same 2004 OMPO survey results (see table in letter, pg. 11) Response: The rail project was the subject of the public referendum in November 2008 and received a 50.6 to 45.7 favorable vote. ~~These results are more important than a survey.~~					
284	8/26/10	While the rail transit line is	HonoluluTra		2004 survey showed	No	No

Comment [eaz72]: This does not seem relevant to information presented in the FEIS or the impacts.

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	letter	supposedly to benefit Central and Leeward O'ahu, these folks clearly preferred road related solutions. The Final EIS does not mention the later 2006 OMPO survey, an excerpt from which is shown below, and this is not surprising since it revealed a highly favorable attitude on the part of the public to HOT lanes. Response: The rail project was the subject of the public referendum in November 2008 and received a 50.6 to 45.7 favorable vote. ~~These results are more compelling and legally binding than a survey.~~	**ffic.com** Cliff Slater		road improvements were favored by Central and Leeward O'hau.		
285	8/26/10 letter	Reaction to the HOT lanes was very positive overall. From responses, two-thirds of island-wide would reportedly back construction of HOT lanes along parts of Kamehameha Highway and the H-1. Response: Even a positive	**HonoluluTraffic.com** Cliff Slater		Survey showed 2/3 of public would support HOT lanes.	No	No

Comment [eaz73]: See comment above.

Comment [eaz74]: This is not a comment on the FEIS.

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		response to another option does not obviate a preference for the Rail Project.					
286	8/26/10 letter	There is nothing shown in the Final EIS to justify the statement that, "The Project will reduce daily transportation energy demand by 3 percent." (FEIS, Table 4-1). Since the typical rail transit line shows no energy savings over the average automobile, according to the U.S. Department of Energy, and the Honolulu rail project will be highly directional, it is unlikely that the Honolulu rail project will show energy savings over automobile use. Response: The EIS shows how that figure is arrived at based on forecasts of use. This calculation is based on the decrease in VMT that will occur as a result of the project.	**HonoluluTraffic.com** Cliff Slater		No justification on reduction of energy use by Project.	Yes	No
287	8/26/10 letter	As to construction energy use, one has only to use the City's own data	**HonoluluTraffic.com** Cliff		Project will result in little energy savings.	Yes	No

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		to confirm that there will be little energy savings from this rail project. Table 4-21 of the FEIS projects daily savings of 2,440 million British thermal units (MBTUs) of energy each day for the rail project over the No-Build. However, page 4-206 says the project construction will have energy costs of 7,480,000 MBTUs. This means that it will take ten years of operation to pay back the energy used in rail's construction. And this will only happen if the City is able to show, which it has not done so far, that these savings will actually result from operation. Response: The EIS shows all these figures and their benefit to the City. Construction of any project, including MLA, would require energy use.	Slater				
288	8/26/10 letter	The Final EIS does not show, in anything like the level of detail required by statute, a rationale for	**HonoluluTraffic.com** Cliff Slater		Managed lane alternative was dismissed without good rationale.	Yes	No

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		dismissing the Managed Lane Alternative from the Alternatives Analysis. Response: The Final EIS addresses the MLA at a level more detailed than is required since it was not an option chosen for further analysis in the AA based on poor performance compared to the fixed guideway.					
289	8/26/10 letter	A more reasonable construction cost projection, a reduction in the number of buses forecast, elimination of most park and ride spaces and, most importantly, the restoration of the zipper lane, would show that the MLA outperforms the fixed guideway rail system both operationally and in its ability to avoid historic properties and native Hawaiian burial places. Response: This comment is not consistent with the findings of the			Managed Lane Alternative out performs the fixed guideway in a number of ways.	Yes	No

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		analysis and no compelling information has been presented to suggest it would change the outcome. Nor was it presented at the time when the opportunity was afforded during the scoping process for the DEIS.					