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May 21, 2010

RT10/09-337646

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

Dear Mr. Uechi:

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

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

Comments on Chapter 2 of the Draft EIS: Alternatives Considered

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

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

As discussed in Chapter 2 of the Final EIS, additional alternatives, including other technologies, were evaluated during the Alternatives Analysis phase of the Project (2005 to 2006). The Alternatives Analysis phase evaluated a range of transit mode and general alignment alternatives in terms of their costs, benefits, and impacts. An initial screening process (fall of 2005 to winter of 2006) considered alternatives identified through previous transit studies, a field review of the study corridor, an analysis of current population and employment data for the study corridor, a literature review of technology modes, work completed for the Oahu Regional Transportation Plan 2030 (ORTP) prepared by the Oahu Metropolitan Planning Organization (OahuMPO) (OahuMPO 2007), and public and agency comments received during the formal Alternatives Analysis scoping process.

During the fall of 2005 and winter of 2006, the City and County of Honolulu (City) completed the alternatives screening process that is documented in the Honolulu High-Capacity Transit Corridor Project Alternatives Screening Memorandum (DTS 2006a).

Three scoping meetings were held as part of the screening process in December 2005 with the purpose of presenting alternatives to the public, interested agencies, and officials and receiving comments on the Purpose and Need, alternatives, and scope of the Alternatives Analysis:

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

with the purpose of presenting alternatives to the public, interested agencies, and officials and receiving comments on the Purpose and Need, alternatives, and scope of the Alternatives Analysis. Refinements were made to the alternatives as a result of public comments. The comments received during scoping meetings are provided in Appendix G of this Final EIS.

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

Comment [TH1]: Discuss how the alternatives developed from the P&N. This entire paragraph needs to follow a logical timeline and lists the steps in chronological order, starting with the date (month/year) the screening process began. It also needs to discuss if public meetings were held, how public comments were evaluated, and how alternatives were eliminated from further consideration, etc.

As stated in Section 2.2.3 of this Final EIS, the NEPA Notice of Intent requested input on five transit technologies. A technical review process that included the opportunity for public comment was used in parallel with the alignment analysis to select a transit technology. The process included a broad request for information that was publicized to the transit industry. Transit vehicle manufacturers submitted 12 responses covering all of the technologies listed in the Notice of Intent. Rubber tire on concrete systems, including the Phileas system, were evaluated by a five-member panel appointed by the City Council that considered the performance, cost, and reliability of the proposed technologies. The panel, comprised of transit experts and a transportation academic, accepted public comment twice as part of its review. By a four-to-one vote, the panel chose a steel wheel operating on steel rail system. The four panel members selected steel-wheel technology because it is proven, safe, reliable, economical, and non-proprietary. Proprietary technologies, meaning those technologies that would have required all future purchases of vehicles or equipment to be from a single manufacturer, were eliminated because none of the proprietary technologies offered substantial proven performance, cost, and reliability benefits compared to steel wheel operating on steel rail. Selecting a proprietary technology also would have precluded a competitive bidding process, likely resulting in increased overall project costs. The panel's findings were summarized in a report to the City Council dated February 22, 2008.

In parallel with the alignment analysis, a five-member panel appointed by the City Council and the Mayor considered the performance, cost, and reliability of the five proposed technologies for the fixed guideway system. The panel twice accepted public comment as part of this review. By a four-to-one vote, the panel selected steel wheel operating on steel rail as the technology for the Project evaluated in the Final EIS. The four panel members selected steel wheel technology because it is mature, proven, safe, reliable, economical, and non-proprietary. Proprietary technologies, such as Mag-Lev, Sky-Tran, and Phileas system, meaning those technologies that would have required all future purchases of vehicles or equipment to be from a single manufacturer, were eliminated because none of the proprietary technologies offered substantial proven performance, cost, and reliability benefits compared to steel wheel operating on steel rail. Selecting a proprietary technology also would have precluded a competitive bidding process, likely resulting in increased overall project costs.

Comment [TH2]: Please list a date when this decision was made? Was it during a City Council meeting? Please clarify.

Comment [TH3]: Please list dates. What formats were accepted? (ie., email, written, etc.)

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

Regarding construction delays, FTA and the City have developed a Programmatic Agreement in consultation with the State Historic Preservation Division and other consulting parties to address any is-working-closely-with-the-Oahu-Island-Burial-Council-and-other-stakeholders-to-develop-the-most-effective-ways-to-find-identify-protect-or-relocate-any-affected-iwi-kupuna (Hawaiian burials) or other historical or archaeological resources. The Programmatic Agreement is included in Appendix H to the Final EIS. It includes surveys to locate and well-address any iwi kupuna issues in advance of Project construction. State law specifies how-provides-procedures-and-a-timeline-to-address-inadvertent-discoveries-of-burials-during-construction, which-are-to-be-addressed-in-a-timely-manner-to-would-avoid-substantial-project-delays. Section 4.18.11 of the Final EIS provides more detail on potential for discovery of burials during construction.

Comment [TH4]: This section needs a much more substantial description of the Section 106 process and coordination with consulting parties and the SPHD. Cite regulations regarding Section 106.

The Project is a Fixed Guideway Transit system. The system will use steel-wheel-on-steel-rail technology. Current versions of this steel wheel on steel rail technology, such as Mag-Lev, Sky-Tran, and Phileas system, are quieter than a bus at the same distance. Noise and vibration effects from the Project were evaluated following FTA guidance and are detailed in Section 4.10 of the Final EIS. The Project will cause no severe noise impacts. Moderate impacts will occur at upper floors of a few high-rise buildings (as shown in Table 4-18 in the Final EIS). With the recommended committed mitigation in place (sound absorbing material and wheel skirts), the noise analysis indicates that the new noise generated by the Project will be lower than the existing noise levels in most places. The project design includes an integrated noise-blocking parapet wall at the edge of the guideway structure that extends three feet above the top of the rail. The parapet wall will substantially reduce ground-level noise.

As committed to in the Final EIS, Wheel skirts will increase the benefit from the parapet wall at locations above the elevation of the track. The use of sound-absorptive materials below the tracks in the areas that will experience moderate noise impacts will reduce the Project noise levels from the upper floors to below the impact level. Once the Project is operating, noise levels will be re-measured to confirm that there are no noise impacts from the Project.

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

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

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

Comment [TH5]: Was vibration also examined during the N&V analysis? Mention the analysis followed the FTA N&V manual.

Comment [TH6]: The FEIS needs to have committed mitigation measures in place, not simply recommendations.

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

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

Ridership forecasts are over 116,000 per day in 2030 as noted in Chapter 3 of the Final EIS, and s. The Project's financial plan described in Chapter 6 of the Final EIS includes ongoing operation and maintenance funding for the Project. One of the factors cited in the selection of steel wheel technology was standardization, so that replacement vehicles and other system elements would be available from multiple sources. Stations will accommodate an attendant to help prevent the types of vandalism and nuisances described in your comment. Section 2.5.4 of the Final EIS describes security measures that will be implemented with the Project.

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

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

The overall public information program has been continuous since the beginning of the Project in 2005 and has meet the requirements of SAFETEA-LU Section 6002. The Alternatives Analysis phase evaluated a range of transit mode and general alignment alternatives in terms of their costs, benefits, and impacts. During the fall of 2005 and winter of 2006, the City and County of Honolulu completed the alternatives screening process that is documented in the Honolulu High-Capacity Transit Corridor Project Alternatives Screening Memorandum. As detailed in Chapter 8 of the Final EIS, scoping meetings were held, which included a presentation of alternatives to the public and interested agencies and officials to receive comments on the Purpose and Need, alternatives, and scope of the analysis for the Alternatives Analysis. Refinements were made to alternatives based on the public input during scoping. In total, 75 fixed guideway alignment options were screened.

The following alternatives were studied in the Alternatives Analysis: No-Build Alternative, Transportation System Management (TSM) Alternative, Managed Lane Alternative, and the Fixed Guideway Alternative. After review of the Alternatives Analysis Report and consideration of public comments, the City Council selected a fixed guideway transit system extending from

Comment [TH7]: Refer reader back to the discussion on the alternatives analysis earlier in the document.

Comment [s8]: There is no comment on system capacity.

Comment [TH9]: A new paragraph needs to be written which includes information on ridership and capacity issues and New Starts funding. Capacity is also an issue in the original comment which is not adequately addressed. Also mention how ridership and capacity issues are integral in the alternative analysis and application for New Starts funding.

Comment [TH10]: These sentences can also be included in the New Starts paragraph, since they deal with funding.

Comment [s11]: This paragraph addresses New Starts funding issue

Comment [TH12]: Mention SAFTEA-LU Section 6002

Comment [TH13]: Were the scoping meetings held as part of the screening process or independently? How many were held and when (specific date)? What information was presented?

Comment [KMC14R13]: Text added on page 2 of the letter addressing # of meetings, specific dates and locations where they were held, what was presented, and that the comments from scoping meetings are in Appendix G of the FEIS.

Comment [TH15]: How were comments captured? Letter, email, etc.?

Comment [TH16]: Refinements were made based on what? Public comment? Please clarify process, end up with 75? Or did you have 75 options from the beginning? It's unclear as written.

Comment [TH17]: Did the refinements add to the total alignment options screened i.e., did you start with less than 75 options and through the refinement process, end up with 75? Or did you have 75 options from the beginning? It's unclear as written.

Mr. Mike Uechi
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~~Kapolei to UH Manoa with a connection to Waikiki as the Locally Preferred Alternative. The selection, which eliminated the TSM and Managed Lane Alternatives, became Ordinance 07-001 on January 6, 2007.~~

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

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

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Comment [TH18]: This paragraph should be moved to the section on Chapter 2 earlier in the document.

How do these alternatives fit in with the 75 options? Please clarify.

Mention the TSM alternative is a required of the New Starts process and cite the regulation.

Explain how the LPA was carried forward into the NEPA process.