U.S Department
of Transportation

**Federal Aviation
Administration**

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Honolulu Airports District Office

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May 10, 2010

Mr. Wayne Y. Yoshioka
Director, Department of Transportation Services
City and County of Honolulu
650 South King Street, 3RD Floor
Honolulu, HI 96813

Dear Mr. Yoshioka:

Honolulu High-Capacity Transit Corridor Project
Administrative Final Environmental Impact Statement Review Comments

This is in response to your letter dated April 28, 2010, requesting Federal Aviation Administration (FAA) review of the administrative Final Environmental Impact Statement (FEIS) for the Honolulu High Capacity Transit Corridor Project. The FAA has completed its review of the document and our review comments are provided in the enclosure.

FAA has confined its comments on the FEIS to those areas of concern that could affect our approval actions. We felt that a few areas needed amplifying or required more clarity. We have provided some additional comments for your consideration that we believe may improve the overall EIS document. We would be happy to discuss these if you believe it would be helpful.

Please note that the FAA in a letter to the Federal Transit Administration on April 28, 2010, forwarded the Airport Layout Plan (ALP) submitted by the State of Hawaii Department of Transportation - Airports Division, which includes the Ualena Street refinement to the airport alignment. This ALP shows an acceptable alignment at Honolulu International Airport, which is consistent with FAA standards for airport development. This ALP may be included in the published FEIS.

If you have any questions or would like to discuss the review comments, please contact Mr. Steven Wong at (808) 541-1225.

Sincerely,

Ron V. Simpson
Manager, Honolulu Airports District Office

Enclosure: FAA Review Comments

cc: APP-1, APP-400, AWP-600, FTA Region IX

FAA Review Comments: Honolulu High-Capacity Transit Corridor Project Preliminary Final EIS dated April 28, 2010

Pg. #	Sect. #	Comm #	FAA Comment (Deletions are in strikeout and additions are noted in bold)
			GENERAL COMMENTS
		1	City Council Resolution 08-261 passed on January 28, 2009, to support the Airport Alternative predates the decision to refine the rail alignment near the airport. A question whether the resolution is broad enough to include the refinement or if it is specific to a particular route may be brought up. FAA notes that although this item falls under the City's purview, the City may want to consider whether additional information on this item should be included in the document.
		2	There appears to be no information to indicate why the Ualena Street refinement was selected other than it was the least costly alternative. It is recommended that additional discussion on the rationale for selection of the Ualena Street refinement be included.
		3	The introduction to Chapter 4 states that, "This design refinement [Ualena Street] will not create any significant effects to the natural and built environment." It is recommended this statement also say that the preparers put the refinement through the same impact analysis as the other alternatives. Otherwise, the statement above cannot stand alone since it is not supported by any analysis. It is unclear whether the refinement changed any of the impacts that were previously disclosed in the Draft EIS. It appears that only visual and Section 106 changes were addressed due to the Ualena refinement, but not any of the other impact categories in Chapter 4 analysis.
			SPECIFIC COMMENTS
Title page		1	References to the NEPA statute (42 U.S.C. §4371 et seq.) or the NEPA regulations (40 C.F.R. Parts 1500-1508) should be included on this page.
Abstract		2	Recommend providing a cite to NEPA (see above). Also, note Section 4(f) has been recodified as 49 U.S.C. 303(c), although it is still commonly referred to as 4(f).
Page after Abstract	Permits and Approvals	3	Page containing State of Hawaii Chapter 343 and EIS Summary Sheet, under Permits and Approvals, delete "FAA conditional approval of the Airport Layout Plan." After the "FAA Form 7460-1" add the text "Notice of Proposed Construction or Alteration" to identify the form.

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Pg. #	Sect. #	Comm #	FAA Comment (Deletions are in strikeout and additions are noted in bold)
	Preface	4	Add the below text to the document. Normally the FAA includes this information in the Purpose and Need Chapter to explain the federal actions that FAA will consider. It appears that information on the Cooperating Agencies is included in Chapter 8 of the FEIS. Request this information be added within the appropriate section of the FEIS to discuss the FAA federal actions for the project: The Federal Aviation Administration (FAA) is a Cooperating Agency on the Honolulu High-Capacity Transit Corridor Project (HHCTCP) Environmental Impact Statement (EIS), in accordance with 40 Code of Federal Regulations (CFR) Part 1501.6(a)(1), since it has special expertise and jurisdiction by law to approve proposed development at Honolulu International Airport (HNL). The Federal Aviation Administration (FAA) is assigned responsibilities pursuant to 49 USC 40101 et seq., for civil aviation and regulation of air commerce in the interests of aviation safety and efficiency. As a Cooperating Agency on this EIS, FAA will use the HHCTP EIS documentation to comply with its own requirements under NEPA for federal actions. The FAA will also use the EIS to support subsequent decisions and federal actions including unconditional approval of the portion of the Airport Layout Plan (ALP) that depicts the proposed Project, determination of eligibility for federal assistance under the Federal grant-in-aid program, approval of an application to use Passenger Facility Charges, and approval of to grant a right-of-way on HNL to carry out the action.
Page 2-22	2.4.1	5	The following changes need to be made to paragraphs 2, 3 and 4 from this section: In addition, subsequent to the Draft EIS, additional coordination with FTA, the Federal Aviation Administration (FAA), and HDOT Airports Division revealed that the **Aolele Street alignment required refinement to avoid impacting the** ~~Airport Layout Plan (ALP) for~~ Honolulu International Airport **(HNL)** ~~, upon which the alignment was based, was inconsistent with current FAA regulations for the~~ runway protection zone**s** ~~on runway 22L/4R. The ALP showed a 1,000-foot runway protection zone where the requirement is now 1,700 feet.~~ Although there are existing buildings within its limits, **new** objects and activities are discouraged from being added to the ~~controlled activity~~ **central portion** ~~area~~ of the runway protection zone. **The Aolele Street alignment would have resulted in extensive impacts at HNL.** This coordination resulted in an evaluation of a range of options to avoid **impacting the airport** ~~the runway protection zone~~, including relocation of runway 22L/4R in the makai **(south)** direction. **A review of options** for transitioning the **rail** guideway along a range of alignments between Aolele Street and the H-1 Freeway **was conducted**. Based on this evaluation, **DTS and HDOT** agreed the design **would be** ~~was~~ refined to **have the guideway alignment** ~~follow Ualena Street for a short distance,~~ transition~~ing~~ from Aolele Street to Ualena Street at the extension of Ohohia Street (Figure 2-10). This option has the lowest cost and fewer impacts to the airport than the Airport Alternative described in the Draft EIS. The FAA's evaluation of **the** design options **showing** potential impacts to HNL **and which** options ~~to~~ avoid conflicts to **airport operations and** ~~within~~ **to** the runway protection zone, is included in Appendix K of this Final EIS. **This FAA evaluation is only for impacts to the HNL from the various design alignment options, in order to provide needed information for selection of the refined alignment by DTS and HDOT-A. The FAA evaluation does not review off-airport impacts. This evaluation shows that the Aolele Street alignment would result in significant impacts to the airport. Preliminary cost estimates and a review of environmental impacts showed that this alignment would be more costly and result in greater environmental impacts at the airport. The other alignment options would not result in the same level of impacts to the airport.** ~~The~~ **HDOT-A submitted their Draft ALP** ~~FAA's conditionally approved ALP with~~ **showing** the refined airport alignment **that was selected, and which** is also included

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Pg. #	Sect. #	Comm #	FAA Comment (Deletions are in strikeout and additions are noted in bold)
			in Appendix K. **The FAA has indicated in a April 28, 2010 letter, that the refined airport alignment submitted in the ALP meets FAA airport design standards.**
Page 3-3	Table 3-1	6	Make the following changes to Project Affects under Airport Facilities: • The project alignment ~~is outside the building restriction line and~~ avoids the central portion of the runway protection zone. • All elements of the Project **will be built to be** entirely below the approach surface of all runways and clear of the transitional surface.
Page 3-26	3.3.6	7	Delete the following sentence from the third paragraph, since it the information is not correct: "~~Arrivals on 22L/22R and departures on 4L/4R together account for less than 10 percent of total operations, most of which are smaller, general aviation aircraft.~~"
Page 3-59	3.4.6	8	The following changes need to be made to the first paragraph from this section, as shown below: The elevated project guideway alignment through the airport was developed in consideration of the Honolulu International Airport Draft Master Plan (2009) and the Airport Layout Plan for Honolulu International Airport ~~(1995)~~ to minimize effects on existing and future airport facilities and aviation activities. Support columns will be located to maintain normal roadway movements and minimize effects to parking, car rental operations, lei stands, freight movement, and other business interests near the airport.
Page 3-59	3.4.6	9	Second paragraph in this section indicates that as shown in Table 3-24, 110 of 175 parking spaces will be permanently closed to accommodate the airport station. Table 3-24, however, indicates that construction would require removal of 111 of the approximate 175 parking spaces, and that 60 spaces would be restored once construction is complete. The numbers don't add up and need to verified.
Page 3-60	3.4.6	10	The following changes need to be made to the fourth paragraph on this page, as shown below: The guideway will pass near the ends of **R**~~r~~unway~~s~~ 22R~~/4L~~ and **Runway** 22L~~/4R~~. ~~Due to the proximity of the guideway to the runways,~~ **A** Federal Aviation Administration (FAA) Form 7460-1, Notice of Proposed Construction or Alteration, will need to be submitted to the FAA **at a minimum of 45-days** prior to construction **on the airport**. ~~Preparation of the necessary submittal materials has begun with assistance from HDOT-Airports Division staff.~~ Honolulu International Airport Operations has evaluated the project impact and verified that it does not affect airport operations. The evaluation **of the alignment options at the airport and the review of the ALP** completed by FAA ~~is~~ **are** included in Appendix K of this Final EIS. **The FAA found the rail guideway alignment refinement on Ualena Street is consistent with airport design standards.**

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Pg. #	Sect. #	Comm #	FAA Comment (Deletions are in strikeout and additions are noted in bold)
Page 3-60	3.4.6	11	The following changes need to be made to the sixth paragraph on this page, as shown below: The FAA has specific horizontal and vertical clearance requirements for the runways at Honolulu International Airport. Due to the proximity of the Project **to the ends of R**~~r~~unways 22R~~/4L~~ and 22L~~/4R~~, the following clearance requirements were evaluated for the elevated project guideway, including the Lagoon Drive Station: ~~building restriction line~~, runway protection zone, approach surface, and the transitional surface. The refinement in **the** project alignment was made to avoid the central portion of the runway protection zone **(RPZ)**. As shown in Figure 3-14, the Project will pass through the less-restrictive controlled activity area. The FAA has indicated this is acceptable. **Note that the Runway 22R end in Figure 3-14 shows an RPZ that has been reclassified for use by the smaller aircraft that currently use the runway.** The **preliminary** airspace evaluation confirmed that the Project is consistent with requirements **for** ~~of~~ the ~~building restriction line,~~ approach surface ~~and transitional surface regulations~~ **RPZ and runway safety areas**. Results of the evaluation are shown in Appendix K. In addition, the Airport Layout Plan was updated **by** ~~in cooperation with~~ HDOT ~~and FAA~~ to show the Project alignment and stations**, and found acceptable by the FAA.** ~~and a~~ **A** copy **of the ALP is included** in Appendix K. The City will coordinate with FAA to obtain the necessary ~~permits and~~ approvals related to construction at or near the airport as listed in Table 4-40 (in Chapter 4).
Page 3-68	3.5.6	12	Add the following sentence at the end of this section, "An FAA form 7460-1 – Notice of Proposed Construction or Alteration will be filed prior to any construction on airport property."
Page 4-14	4.2.2	13	Under the Future Land Use Plans and Polices section add the following information: The Airport Layout Plan for Honolulu International Airport shows the existing airport layout and proposed future development at the airport. The refined alignment was identified by HDOT-A in an updated Airport Layout Plan (ALP) and submitted to the FAA for review of airport design standards. The FAA accepted the ALP on April 28, 2010, indicating the ALP shows an acceptable alignment at the airport. The Project would not conflict with airport uses. A preliminary airspace review also indicates that based on the DTS submitted rail heights, there are no conflicts with airspace at airport. An ALP review also indicates the guideway is compatible with airport related uses.
Page 4-141	4.13.3	14	The second paragraph on this page indicates that based on information provided to FTA by USFWS, coordination with USFWS staff, and field observations, there will be "no effect" to threatened and endangered species or designated critical habitat related to this Project. It is suggested that referencing available USFWS documentation would be helpful in confirming their concurrence with the "no effect" determination.

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Pg. #	Sect. #	Comm #	FAA Comment (Deletions are in strikeout and additions are noted in bold)
Page 4-188	4.18	15	This section discusses the construction of the project as needs to include the below additional information on airport construction: Honolulu International Airport Prior to any construction at the airport an FAA Form 7460-1, Notice of Proposed Construction or Alteration will be filed with the FAA to ensure that appropriate coordination with the FAA and HDOT-A is established. Close coordination with HDOT-A and appropriate FAA program offices will be conducted in order to maintain aviation and airfield safety during construction of the Project.
Page 4-222	Table 4-39	16	The table which contains planned and foreseeable development in the study area, also needs to include the following planned development for which the preliminary environmental documentation is being prepared at HNL: Mauka Concourse / Located at Honolulu International Airport and includes the planned construction of a new Mauka Concourse, relocation of commuter airline facilities, and a new consolidated rental car facility. / Planned Project
Page 4-235	Table 4-40	17	Table references FAA "Conditional approval of the ALP showing project alignment." Change Conditional to Unconditional.
Page 4-235	Table 4-40	18	Under the row for the Form 7460-1, for the Responsible Party and Status column, the note indicates the form needs to be submitted 18 months prior to construction. Correct this to state the form should be submitted at a minimum of 45-days prior to construction.
Page 8-2	8.1	19	Second paragraph, last sentence add the acronym (FAA) after "Federal Aviation Administration." Add the following additional sentence at the end of the second paragraph, "The FAA had been initially invited and was involved in the project as a Participating Agency."
Page 8-3	8.2.2	20	Change the text in the second column listing the FAA as a Cooperating Agency to, "U.S. Department of Transportation Federal Aviation Administration – The Federal Aviation Administration has regulatory oversight jurisdiction at Honolulu International Airport and will need to approve: the Airport Layout Plan changes as a result of the project, use of airport revenue for the airport portion of the project and for the right-of-way request for use of airport property."
			Comments on Appendix K
Page 12	Appendix K	21	This page contains a table titled "Rail Design Options for Honolulu International Airport" however there is no source for who prepared this table. The table was not prepared by the FAA and some of the information in the table is not consistent with the FAA information paper in Appendix K. Recommend this table be removed to prevent any confusion with the airport impacts identified by the FAA.
Pages 18-24	Appendix K	22	The Existing Airport Layout Plan (1995), should be removed from Appendix K, since the information is not the most current ALP available for the airport. Also their may be some confusion with the recently submitted Draft ALP that is being included in Appendix K.

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Pg. #	Sect. #	Comm #	FAA Comment (Deletions are in strikeout and additions are noted in bold)
Pages 25-40	Appendix K	23	FAA Evaluation of Airport Rail Transit Alignment Options, The bottom of the pages contains the public release language "Public release of this document must be determined under the provisions of Title 5 U.S.C. Section 552 et seq", which needs to be removed.
Pages 25-40	Appendix K	24	FAA Evaluation of Airport Rail Transit Alignment Options, The text "Source: City and County of Honolulu" needs to be added below the following figures: Figure 3, Figure 4a, Figure 4b, Figure 5a , Figure 5b, Figure 6a, Figure 6b, and Figure 7.
Pages 25-40	Appendix K	25	The following changes reflect corrections to the previously provided FAA Evaluation of Airport Rail Transit Alignment Options paper included in Appendix K. The actual page number from the paper is used below Page 3, second paragraph, change Runway 4L/22R from 6700 feet to 6952 feet. Page 5, fourth paragraph, line 4, line 8, change "a mile offshore" to "5 miles offshore" Page 8, first paragraph, second line, change Runway 8L length from "12,000" to "12,300" Page 16 third paragraph, fifth line, change "4R and 4R" to "4R and 4L". Page 16, last paragraph, change "255,00 lbs" to "300,000 lbs" Page 19, last paragraph, line 2, change Runway numbering from "8R/22L" to "8R/26L"

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