From: Sukys, Raymond (FTA)
To: Zelasko, Elizabeth (FTA)
CC: Matley, Ted (FTA); Rogers, Leslie (FTA); Marler, Renee (FTA); Rogers, Leslie (FTA)
Sent: 5/17/2010 2:23:09 PM
Subject: FEIS comments

Hi Liz,

I combined my comments with PMOC comments:

Page ii, Two NOIs were published for this project.

Page ii, Explain how the EIS can be published consistent with Hawaii statute 343 requirements. It is unclear how a document that joins Hawaii statute 343 and FEIS can be issued when the Governor approval on the 343 will not be ready for months. The steps are unclear for FTA.

Page ii, Delete the paragraph that begins with, "Should any construction phase of this Project explicitly proceed without Federal funding, the mitigation measures contained in this document and the subsequent Record of Decision for that phase of the Project may not be enforceable by FTA."

Page S7, This section states that the project is consistent with land use objectives including views and vistas yet we know that there are identified adverse effects on protected mauka/makai view corridors. Please clarify.

Page S11, Identify maintenance facility for FEIS. This should be resolved. An alternate site may remain.

Page 1-4, FTA's notice of intent in 2005 was to prepare an EIS. While the NOI does include language about the AA, we don't issue NOIs for AAs.

Figure 2.1, With the line-up of solicitations and the award of the Kiewet contract, it is clear that the City does not intend to wait for an FFGA prior to beginning work. There is no discussion of optional approaches such as a request for a Letter of No Prejudice to advance work and mention of FTA's pre-award authority for long lead items.

Page 2-6, Please re-write the following sentence, "In addition, electrically powered trains are quieter than buses and because trains only come every few minutes rather than constantly, as buses and automobiles do, pedestrians and motorists are often unaware of their approach."

Page 2-22, Add *new* to "Although there are existing buildings within its limits, *new* objects and activities are discouraged from being added to the controlled activity area of the runway protection zone." The FAA made this point in numerous meetings.

Page 2-28, The FEIS should identify the corresponding year for the peak fleet requirement in the last paragraph.

Page 2-29, The FEIS indicates that the system may be "manually operated by a driver or fully automated (driverless). However, this is misleading since manual operation will only occur under unusual circumstances. Clarify by indicating that the system is being designed to operate as an automatic operator-less system which means no operators on board.

Page 2-32, Figure 2-14, The side platform with concourse configuration shows a platform level extending out to the station entrance structures on the outside of the roadway, which would be unnecessary if a set of elevators (from concourse to platform) could be placed within the footprint of the functional

parts of the platforms. The placement of elevators in the station entrance buildings is less convenient than it could be, causing longer travel paths for those with disabilities. It should be noted that these issues were subjects of the VE study completed in April 2010.

Page 2-43, Identify the location of the maintenance facility. The FEIS states two alternate sites for the MSF are being considered: a 44-acre site near Leeward Community College (Navy Drum Site); and the 41-acre site in Hoopili. However, the PMP states that the MSF will be constructed on 43 acres of land at the Navy Drum site. The PMP does not mention an alternate site for the MSF.

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Page 3-3, Is this statement correct, "As the Project complies with Federal Aviation Administration regulations and will not result in long-term adverse effects on Honolulu International Airport, no mitigation measures are planned. Is not the design refinement a mitigation measure for impacts to the airport. Also, what about the encroachment of H1 near the proposed Mauka Terminal as a mitigation.

Page 3-65, The following never was adequately resolved in the DEIS and should be removed because temporary impacts are not identified: "the Project will be constructed in phases and opened as each phase is completed. As a result,there will be stations where fixed-guideway service will temporarily end while the next phase is under construction. This phased opening approach will require interim changes to bus transit service to complement the fixed guideway service. This could have a short-term effect at station areas asbus routes are temporarily moved to connect with fixed-guideway stations. This includes additional buses traveling near certain fixed-guideway stations and associated traffic and pedestrian effects from the bus service. A plan to accommodate the use of phased openings will be developed in advance."

Page 3-71, Same as 3-65, The following never was adequately resolved in the DEIS and should be removed because temporary impacts are not identified: "As discussed in Chapter 2, the Project will be constructed and opened in phases over several years. A plan to accommodate the phased openings will be developed in advance. As the stations are completed and opened, rail service will be extended and feeder bus service from surrounding neighborhoods will be implemented."

Page 4-6, Where does the document acknowledge the specific local policy that "protects" certain view corridors? Note, this statement, "The Project will block views in several areas of the corridor, including protected mauka-makai views."

Page 4-110, Section 11.5.2 and 11.5.4: Planting Design states "During construction the City will maintain all landscape areas to HDOT standards." The FEIS should clarify if the landscape maintenance to be performed by the City is outside the construction limits. Typically construction contractors maintain landscaping during construction.

Page 4-182, Update the following to include additional information request in May and expected concurrence, "In April 2010, FTA submitted a request for SHPO concurrence of eligibility and effect for properties on Ualena Street."

Page 4-196, Select a maintenance facility and keep alternate in document.

Page 4-199, The FEIS should include a paragraph generally describing the construction process for a typical portion of line segment and a typical station, as well as the typical expected duration of each major phase of activity (not just discrete activities such "drilled shaft foundation can be completed in one week" as indicated on p. E-2). The affected parties along the alignment should know how long they will be impacted during construction. Neither the text nor Appendix E provides any information on this.

Page 4-199, Construction Effects section, The FEIS is fairly silent on borrow or waste disposal. The high number of deep bores for the guideway piers will produce a high volume of waste dirt. If there is a plan for reuse or disposal of this material, it should be discussed in the FEIS. Something similar to the following could be considered for inclusion in the FEIS: "BMPs will be used in the construction of this project to minimize impacts related to borrow and waste disposal activities. The location of borrow and waste disposal sites may not be known until the project is let for construction. In general practice the

contractor selects the sites based on free market economics (i.e., negotiations with property owners). Solid waste generated by clearing and grubbing, demolition, or other construction practices will be removed from the location and properly disposed. Contractors must comply with all permitting requirements for borrow locations, and follow other applicable contract specifications. Prior to their use, these sites would be assessed for impacts to resources such as archaeological and historical resources, wetlands, etc., and appropriate measures would be employed to avoid or minimize impacts, if any. Where impacts would warrant, the contractor, with City oversight, would obtain required permits. Due to the cost of required mitigation when permits are needed, contractors often select other sites that do not require permitting. Solid waste generation resulting from construction should be short-term and confined to the vicinity of the project area. In many cases, and where available, the construction contractors use existing agricultural fields near the construction sites for borrow/waste sites. They are much easier to use and have lower potential to impact protected environmental resources."

Page 4-205, In exception to the following, a noise protocol should be developed now and not later, "The noise and vibration construction mitigation plan will be prepared to establish a protocol to monitor noise during construction and a plan to mitigate for impacts as required. The City will implement the mitigation measures defined in this Final EIS, construction plan, and HDOH noise permit requirements.

Page 6.2, Tables 6-1 and 6-2 do not match SCC Workbook dated January 6, 2010 provided by the City. SCC Workbook indicates Total Project Cost (excluding financing) of $5.057B. FEIS indicates Total Project Cost (excluding financing) of $5.115B.

Appendices B (Preliminary Alignment Plans and Profiles) and C (Preliminary Right-of-Way Plans) are missing substation numbers 7, 13, 14, 15, 16, 17, 18. There are also no substations shown for the MSF, which may require two substations.