

## Comments on Administrative DEIS for Honolulu High-Capacity Transit Corridor Project

Pg. i, first paragraph: After “(FTA)”, insert “the public and interested parties with the information necessary to make an informed decision, based on a full and open analysis of costs, benefits and environmental impacts of alternatives considered.”

Pg. S-1 and 1-19, Purpose and Need: high-capacity transit is stated as the purpose but the ensuing descriptions provide no evidence that there is a transit capacity problem today or in the future. If there is a capacity problem it needs to be better described. It appears that capacity is being used when the issue is mobility improvements. Additionally, the purpose should comport with what is stated in Chapter 7, which contains 4 sections.

Pg S-2: Integrate last paragraph into what was said earlier.

Pg. 2, 2<sup>nd</sup> paragraph: Briefly define “scoping”.

Pg. S-4, 2<sup>nd</sup> full paragraph: briefly define “Chapter 343”.

Pg S-4, Transportation: this section should quantify changes in future highway and transit travel times of the no build alternative versus today and the changes due to the build alternatives (which really don't differ compared to each other) versus the no build.

Pg. S-5, first full paragraph, first line: replace “reduce” with “increase”.

Pg.S-5, second full paragraph: insert “somewhat” before “slower” as speeds only deteriorate slightly.

Pg. S-5, third full paragraph: define “vehicle hours of delay”.

Pg. S-5, fourth full paragraph: it is unclear how the columns will affect transportation facilities. Will lanes be taken, sidewalks eliminated, parking capacity reduced? Some specificity is needed to define the problem.

Pg. 1-7: Delete the last sentence in the green box referencing Honolulu not having a rail system.

Pg. 1-10: Section 1-3, second paragraph: please cite current tourist ridership on transit that provides a context for the statement that there is a tourist market, or if the statement is intended to address the build alternatives, that should be stated more clearly.

Pg. 1-20, first full paragraph: “TheBus travel times are projected to increase substantially through 2030”. The travel time differences between today and 2030 increase less than 10% which doesn't seem to warrant being characterized as “substantial”.

Pg. 1-21, bottom of first full paragraph: “transit capacity” is cited without any prior reference to its relevance. It doesn't seem to have relevance to the purpose of the section to improve transportation equity.

Pg. 2-8, 2.2.1, second paragraph: “the No Build Alternative's transit component would include an increase in fleet size to accommodate growth in transit demand and increased congestion, thereby allowing service levels to remain the same as today.” It is unclear whether this means that frequencies are increased to accommodate increased demand as a result of expected growth in population and employment, in which case service levels would be increased, or whether it means that frequencies remain the same as today, the fleet size increases due to slower travel times, and there is additional demand for transit but the capacity of the system is the same as today. This should be clarified. We expect the former approach because we assume that is consistent with current policy. In the next paragraph: “Even with fleet expansion, the No Build Alternative would

not provide the services necessary to respond to demand.” “Response to demand” usually means adequate capacity which suggests the latter explanation above. If frequencies are not increased, the text should explain why this is a reasonable assumption.

Pg. 2-13, Table 2-4: the 20% spare ratio for buses is consistent with industry practice. However the figure for rail cars is given as 10%. This should be changed to 20% consistent with industry practice.

Pg. 2-23: The elevation of stations with mezzanines is cited as 18 feet. The elevation for lower stations without mezzanines should also be cited.

Pg. 2-31: the “Bus System section should reference more detailed maps of the bus service illustrating how the bus services will be integrated with the fixed guideway. The figures in this section should have the station names so that references in the text to bus services at stations can be better understood.

Pg. 2-24, green insert: the inserts are good ways of conveying information. However using the word “Potential” begs a number of questions. Either delete the word or explain what this means.

Pg. 2-35: Please reference the figure numbers when the maintenance sites are cited.

Pg. 2-37, project phasing and construction schedule sections: Maps with the phases identified would be clarifying. There are 5 phases but only 4 identified in the first paragraph of the construction schedule section. This is a very unusual phasing plan which delays project benefits to the areas in most need instead serving areas that are undeveloped today. An explanation should be provided addressing this concern and the need to build the project contrary to the approach followed by every other project in the US.

Pg. 3-7: The information on TheBoat service should be updated as the one year demonstration should be over by now.

Pg. 3-3 Existing Conditions: Virtually all the data presented is systemwide but the study corridor conditions are only a portion of the system. Either information should be presented that relates to the corridor, or an explanation provided stating how the systemwide information is relevant to the corridor conditions.

Pg. 3-14, table 3-7: While LOS is commonly used to describe highway conditions, it is a poor description of what travelers can relate to. Please add travel times between representative origins and destinations for the corridor.

Pg. 3-18, VMT, VHT and VHD: It would be useful to spell out the abbreviations and explain what they represent.

Pg. 3-18, Transit Speed section: Information presented on transit speeds is systemwide. In addition, information should be presented similar to that shown on Figure 3-8 and/or Table 7-2. The information in Table 7-2 indicates a slight deterioration of service, which is at variance with the tone of this section. Having more detailed information should allow for a better discussion on how conditions change in the corridor. A similar table showing how highway travel times change for representative origins and destinations should be presented in section 3.3.3.

Pg. 3-19, Transit Ridership section: Reference is made to demand exceeding bus capacity for several routes because of limited road capacity. It is very unusual for circumstances to limit increase in frequencies and the use of larger vehicles to meet capacity. These unusual circumstances, including their location so the relationship to the Build Alternatives is understood, should be explained as that better describes a problem that the Build Alternatives addresses.

Pg. 3-20, section 3.3.3: The second full paragraph cites screenline figures that don't match table 3-11 and leaves out the word "increase". It appears that the next paragraph should precede the second. The fourth paragraph states that "changes in mode share are less than 10%" characterizing that as insignificant. Given that modes shares are frequently around 20%, that could mean a change to 30% which is a big change. The language should be clarified to indicate that transit ridership doesn't change by more than 10%, except for the Ewa to downtown market where a significant increase occurs and the reasons for that should be explained.

Pg. 3-23, reverse Commute Markets section: This or another section need to address one of the goals of the project which is to better serve rapidly developing areas of the corridor.

Pg. 3-23, reverse Commute Markets section, last paragraph: The statement ". Build Alternatives would support enhanced transportation equity" is made without any connection made earlier to support this statement. Some evidence is needed supporting the use of the Build Alternatives by the markets that this statement targets.

Pg. 3-23, Transit-Dependent Household section: Information should be presented on the ridership of transit-dependent households on the project as this was cited as a major need.

Pg. 3-24, transit Speed section, first paragraph: The problem with presenting average systemwide speed information is illustrated again here where the impact of the project on the corridor is understated by averaging its improvements with the system. This figure is misleading and should either be deleted or retained and be described in a way that makes it meaningful.

Pg. 3-26, Table 3-15: An explanation of the column headings is needed because of the confusion between linked and unlined trips by the public.

Pg. 3-26: second paragraph: a 2-hr max peak load of 11,950 is cited along with a reference to the system design capacity of 18,000. The capacity cited is the potential capacity with scope beyond what the project would have. The relevant capacity is 6,000/hr per direction as that is what the project will have. Because peak-hour loadings are greater than 50% of the two-hour loadings, it appears that the projected loadings exceed project capacity. This should be explained.

Pg. 3-32, Access to Fixed Guideway section: Given that many of the riders of the Build Alternatives are forecast to access by bus, the number of riders by bus, walk and park-and-ride should be presented.

Pg 3-32, Transit Reliability section: If many of the riders on the Build Alternatives access by bus, they will be subject to congestion and less reliable travel times for this portion of their trip. That should be discussed.

Pg. 3-33, transfers section, third paragraph: Minimal wait times are cited for riders transferring from buses to the project because of its frequent service. The implications of the return trip for these riders should also be described.

Pg. 3-33, Comfort and Convenience section: Our earlier comment on demand exceeding peak capacity contradicts what is said in this section. The section should be eliminated or significantly changed.

Pg. 3-33, Transit User Benefits section: The description of user benefits gives the impression that this measure is a bureaucratic invention of the federal government that has no relevance to a project, which has two of its objectives as the improvement of mobility (the measure has been referenced in academia for decades). User benefits should be explained as a powerful measure of improved mobility which directly addresses two of the project goals. Information should be developed using

the measure to present how the Build Alternatives meet these goals. User benefits are best expressed on a user basis rather than totals.

Pg. 6-4, FTA Section 5309 New Starts section: At the end of the paragraph insert: “FTA has agreed to consider a funding request of \$1.2 billion, but has not been approached regarding a higher level.”

Pg. 6-10, section 6.5.1: The last sentence of the first paragraph leaves the reader with the impression that contingencies should cover any unforeseen conditions. This is a surprising statement given that most projects at this stage of their development have many unknowns and no such assurance can usually be given. However, if this project has taken extraordinary measures to guarantee a low risk of cost overruns in contrast to the experience of mega-projects elsewhere, then the measures should be described to lend credibility to the claim. The findings from the cost review currently being conducted by FTA’s contractor should be used in this section.

Pg. 6-10, Changes in Project Schedule: This section dismisses the possibility of delays in the project schedule. Findings from FTA’s contractor review of the project should be included and addressed in this section and a realistic assessment of schedule delays described.

Pg. 6-10, Operating Cost Increases: This section should be revised once the O&M costs are revised to be consistent with FTA guidance.

Pg. 6-11, Section 6.5.3: at the end of the first paragraph insert “While FTA has agreed to consider a funding request of \$1.2 billion, the agency has not been approached to consider the \$1.4 billion necessary for Airport Alternative. Should FTA deny funding in excess of 1.2 billion, local funding would be necessary.”

Pg. 6-11, Fare Policy and Ridership: there are no specifics in this piece. For example, there are some real risks given the huge increase in transfer rate.

Chapter 7: A conclusion for each of the 4 sections on needs is that there is an insignificant difference among the 3 build alternatives – that should be stated. The last paragraph of section 7.1.3 should probably be deleted as it doesn’t accurately describe FTA’s evaluation.

Section 7.3, second paragraph, first line: Insert “Cost effectiveness is one of the key criteria that ....”

Pg 7-9, third line: after “ratings” insert “which is currently required to qualify for New Starts funding. Other considerations also apply. However, FTA has not completed its review of the estimates made for the operating and maintenance costs, capital costs or user benefits for the Build alternatives. The reviews could change the cost effectiveness rating. If the reviews result in insignificant changes to these estimates and the estimates hold up through subsequent phases of project development, along with a number of other FTA considerations...”