

Katherine T. Kupukaa  
95-685 Makaunulau Street  
Mililani Town, HI 96789

AUG 18 2010

August 11, 2010

Mr. Ted Matley  
Federal Transit Administration  
Region IX  
U.S. Department of Transportation  
201 Mission Street, Suite 1650  
San Francisco, California 94105

Dear Mr. Matley:

This in regards to the response I received from Wayne Yoshioka, Director of Transportation Services of the City and County of Honolulu on the Final Environmental Impact Statement, I was dissatisfied with the response and found it lacked substantive statements in my opinion. If this came from professionals and it was thoroughly studied, I would have expected better.

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, San 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.

#### 1. Concern about travel lanes removable

Also stated was travel lanes along Kamehameha Highway between Aiea and Pearl City in each 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. Several weeks ago work was being done at the bus stop in front of Pearlridge and 2 lanes were closed and traffic was backed up. The buses were running 20 minutes to a half hour late. If by building the rail traffic, congestion would be eased, I believe the people who use this corridor on a daily basis 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.

#### 2. Concern about adequate demand and ridership for the Project

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.

### 3. Concern about congestion

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.

Sincerely,



Katherine T. Kupukaa

Enclosure

CC: Mr. Wayne Yoshioka  
Department of Transportation Services  
City and County of Honolulu  
650 South King Street, 3<sup>rd</sup> Floor  
Honolulu, HI 96813

DEPARTMENT OF TRANSPORTATION SERVICES  
**CITY AND COUNTY OF HONOLULU**

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DEPUTY DIRECTOR

June 11, 2010

RT2/09-298754R

Ms. Katherine Kupukaa  
95-685 Makaunulau Street  
Mililani, Hawaii 96789

Dear Ms. Kupukaa:

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 your comments regarding the above-referenced submittal:

*1. Concern about travel lanes removal*

*The number of traffic lanes along Kamehameha Highway in Pearl City (three lanes in each direction) will remain the same before and after construction of the fixed guideway. During construction, one lane may be temporarily closed during peak-travel periods and additional lanes may be temporarily closed during off-peak travel periods. Construction-related procedures that may require temporary road closures are described in Section 3.5.3 in the Final EIS.*

*Travel lanes will not be taken away along Dillingham Boulevard as a result of the Project. As shown in Tables 3-9 and 3-10, roadway conditions on Dillingham Boulevard will improve as a result of the Project.*

*The modeling conducted for the Draft and Final EISs considered all roadway projects listed in the Oahu Regional Transportation Plan (ORTP), including a Nimitz Flyover and mitigation measures on the H-1 Freeway. Table 2-4 in the Final EIS lists committed projects from the*

ORTP that were included in all modeling results. As shown in Tables 3-9 and 3-10 in the Final EIS, roadway conditions will improve with the Project.

## 2. Concern about adequate demand and ridership for the Project

As shown in Table 3-18 in the Final EIS, transit ridership will be 44 percent higher with the Project compared to the No Build Alternative. This includes ridership on the guideway as well as TheBus.

As identified in the Section 3.2.1 on Analytical Tools and Data Sources of the Final EIS, transit ridership forecasts for rail and bus service are based on a travel demand forecasting model used by the Oahu Metropolitan Transportation Organization (OahuMPO) for the Oahu Regional Transportation Plan. The OahuMPO model is based on "best practices" for urban travel models in the U.S. and is consistent with consultation with FTA. As indicated in the Final EIS, this modeling approach has been effective in estimating ridership levels in other areas such as Los Angeles County, Salt Lake City, and the Denver region in the last 10 years.

The travel demand forecasting model has been refined since the Draft EIS was published by adding an updated air passenger model (which forecasts travel in the corridor related to passengers arriving or departing at Honolulu International Airport), defining more realistic drive access modes to project stations, and recognizing a more robust off-peak non-home-based direct-demand element (trips that do not originate or end at home) based on Honolulu travel surveys. The Final EIS reflects updated ridership numbers resulting from model refinement.

The Project is one of the first in the country to design and undertake an uncertainty analysis of this type of travel forecast. The uncertainty analysis evaluates the variability of the forecast by establishing likely upper and lower limits of ridership projections. FTA has worked closely with the City during this effort. A variety of factors were considered in the uncertainty analysis. Given the factors considered, the anticipated limits for guideway ridership in 2030 are expected to be between 105,000 to 130,000 trips per day, bracketing the official forecast of 116,000 riders a day used for all calculations. Currently, there are over 250,000 boardings per day on buses.

## 3. Concern about congestion

As shown in Table 3-14 in the Final EIS, the Project will reduce congestion (as measured by vehicle hours of delay) by 18 percent compared to the No Build Alternative. Tables 3-9 and 3-10 in the Final EIS show an improvement in vehicles per hour on Kamehameha Highway during both the a.m. and p.m. peak hour.

The Project responds to unmet demand for transit infrastructure that accommodates current residents and visitors and anticipates future demographic trends. The challenge is to reconcile the need to provide a public transportation system that is safe, accessible, and convenient while preserving aspects of the community that are integral to its character and values. This project will enable the City to concentrate growth in existing urbanized and adjacent areas on Oahu in the decades to come. By reducing the overall number of vehicle miles traveled through expanded public transportation, DTS and FTA are promoting environmental sustainability, congestion reduction, and increased mobility for a diverse population, which will improve the overall quality of life for the majority of Honolulu residents and visitors.

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June 11, 2010

RT10/09-336985

Ms. Katherine T. Kupukaa  
95-685 Makaunuiou Street  
Miiilani, Hawaii 96789

Dear Ms. Kupukaa:

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 your comments regarding the above-referenced submittal:

*Your preference for HOT lanes has been noted. Chapter 2 of the Final EIS summarizes the alternatives screening and selection process. Beginning in the fall of 2005, an initial screening process 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, ongoing work completed as part of 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.*

*The screening process is documented in the Honolulu High-Capacity Transit Corridor Project Alternatives Screening Memorandum (DTS 2006a). Three scoping meetings were held during the screening process in December 2005, which included a presentation of initial alternatives to the public, interested agencies, and officials to receive comments on the Purpose and Need, alternatives, and scope of the Alternatives Analysis. Refinements were made to the alternatives based on the public input during scoping.*

*After completion of screening in the winter of 2006, 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 identified a fixed guideway transit system extending from Kapolei to UH Manoa with a connection to Waikiki as the Locally Preferred Alternative. This identification, which eliminated the TSM and Managed Lane Alternatives from further consideration, became Ordinance 07-001 on January 6, 2007. The NEPA process considered a range of alternatives that was consistent with the identified Locally Preferred Alternative. As discussed in Section 2.2, there were no alternatives that had not been previously studied and eliminated for good cause that would satisfy the Purpose and Need at less cost, with greater effectiveness, or less environmental or community impact.*

*The Managed Lane Alternative was fully evaluated in the Alternatives Analysis. While the Managed Lane Alternative would improve traffic flow on the facility, it would increase overall system congestion (measured as vehicle hours of delay) by inducing additional travelers to drive, which would increase congestion on arterial and collector facilities accessing the freeways and the managed lane. In addition, once a vehicle leaves the managed lane, that vehicle would still be subjected to congestion on surrounding roadways. As shown in the Alternatives Analysis Report (DTS 2006b), the Managed Lane Alternative would not eliminate congestion and bottlenecks on the H-1 Freeway. Table 3-12 in the Alternative Analysis Report shows that, under the No Build Alternative, there would be 18,049 vehicles per hour (vph) operating on the H-1 Freeway in 2030. Vehicle volumes rise to 18,327 vph (Two-direction Option) or 18,419 vph (Reversible Option) with the Managed Lane Alternative, while traffic volumes decrease to 17,209 vph with the 20-mile Fixed Guideway Transit Alternative. Accordingly, the Fixed Guideway Transit Alternative will reduce traffic volumes from those projected under the 2030 No Build Alternative.*

*The number of travel lanes along Kamehameha Highway in Pearl City (three lanes in each direction) will remain the same before and after construction of the fixed guideway. During construction, one lane may be temporarily closed during peak-travel periods and additional lanes may be temporarily closed during off-peak travel periods. Construction-related procedures that may require temporary road closures include those described in Section 3.5.3 of the Final EIS.*

*Conditions on the highway will be worse in 2030 under any circumstances and regardless of which solution is applied. As shown in Table 3-14 in the Final EIS, vehicle hours of delay will decrease by 18 percent with the Project versus without. Tables 3-9 and 3-10 in the Final EIS show traffic at each screenline (virtual lines drawn across the road network at selected locations to enable comparisons) will decrease with the addition of the Project compared to the No Build Alternative. Accordingly, traffic conditions will be substantially better with the fixed guideway than any of the other potential solutions studied.*

*As noted in Chapter 2 of the Final EIS, bus service will be enhanced and the bus network will be modified to coordinate with the rail system. Some existing bus routes, including peak-period express buses, will be altered or eliminated to reduce duplication of services provided by the Project. As stated in Chapter 3 of the Final EIS, with the Project, the rate of transfers will be higher than under the No Build Alternative because of changes in local bus service to maximize access to the fixed guideway system. However, because of the high frequency of the fixed*

*guideway service (three-minute headways between trains during peak periods), riders transferring from buses to the fixed guideway will experience minimal wait times. Riders transferring from the guideway service to buses will benefit from improved frequencies on existing bus routes serving stations. In addition, several new routes with high frequencies will be provided as feeders to the guideway system. Since these routes will primarily operate in residential areas, they will provide greater reliability versus routes operating along congested arterials. The travel demand forecasting model includes a time penalty for transfers. With these characteristics in place, the transit system with the Project will still have ridership levels 44 percent higher than the No Build Alternative. While people typically try to minimize transfers on any trip, the more fundamental criterion for making a trip decision is how long the trip takes. Rail will offer people a shorter overall trip time compared to other options, even with the transfers. As shown in Figure 3-7 in the Final EIS, transit travel during the a.m. peak period from Mililani to Downtown will take approximately 55 minutes with the Project compared to approximately 95 minutes without. Appendix D of the Final EIS describes the proposed changes to bus routes.*

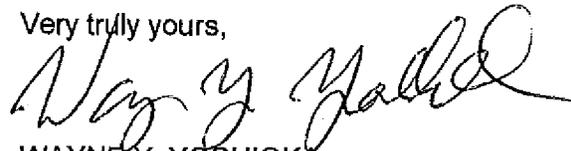
*As the largest shopping complex in Oahu, Ala Moana Center attracts visitors from various locations on the island. In addition, with one transfer, those using the fixed guideway system will have access to other major destinations such as UH Manoa and Waikiki. Transit demand from Ala Moana Center to other locations in Oahu is also substantial in part due to the largest concentration of local bus transfers in TheBus system.*

*Figures 3-9 and 3-10 in the Final EIS show that there will be high fixed guideway ridership levels between stations in the Leeward area of the corridor. There will be over 8,000 riders traveling in the Koko Head direction after the Waipahu Transit Center Station during the a.m. peak period. The number of riders increases even more after the Pearl Highlands Station (over 13,000 riders during the a.m. peak period in the Koko Head direction). Ridership levels near Ala Moana Center will also be high, with over 7,000 passengers getting off the fixed guideway at the Ala Moana Center Station.*

*As a result of transit ridership, traffic volumes will decrease throughout the entire corridor. As shown in Table 3-9 in the Final EIS, there will be a 10 percent decrease in traffic volumes traveling Koko Head-bound at the Ewa screenline during the a.m. peak hour.*

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. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,



WAYNE Y. YOSHIOKA  
Director

Enclosure