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Ms. Dale Evans
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Dear Ms. Evans:

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:

Consumer activity, business operations and the economy

Traffic congestion will improve compared to the No Build Alternative as a result of the Project. Furthermore, the Project will be built in the median of major roads and will not reduce traffic lane capacity. As shown in Table 3-14 of the Final EIS, islandwide vehicle hours of delay will decrease by 18 percent compared to No Build conditions. Traffic congestion will increase at one intersection near East Kapolei Station, one near UH West Oahu Station, three intersections near the Pearl Highlands Station, and at one intersection near Ala Moana Center (Kona/

Keeaumoku Streets) (as shown in Table 3-23 of the Final EIS). However, mitigation will alleviate the delay. Mitigation measures are detailed in Section 3.4.7 of the Final EIS.

Comments regarding taxicab operations and statistics are noted.

Comments regarding the effects of parades on taxicab operations in Waikiki are noted.

Comments regarding the effects of congestion on social activities are noted.

Over $3 billion of roadway improvements are planned for Oahu between now and 2030 according to the OahuMPO Regional Transportation Plan. Some of those will benefit from stimulus funding under the American Recovery and Reinvestment Act, 2009. All those improvements are included in the No Build Alternative against which the Project's performance is measured. The Project will be needed to provide an alternative transportation mode to Ewa and other locations within the corridor. Roadways will continue to be heavily used, but they alone are not able to function effectively according to the analysis in Chapter 3 of the Final EIS.

Funding Sources

The Project is designed to integrate with a feeder bus network. According to the study "Rail Transit in America," available on the American Public Transportation Association website, the cost savings provided by rail are much greater than the subsidy to rail.

Chapter 6 of the Final EIS describes the financial resources anticipated to be needed to pay for the capital costs and ongoing operating and maintenance costs. As the commenter notes, the majority of the resources are anticipated to come from local sources, although Federal funds are a significant part of the Project's Financial Plan.

Section 6.6 of the Final EIS discusses risks and uncertainties associated with the financial analysis presented in Chapter 6. Conditions on Oahu have been accounted for in structuring the financial analysis.

Cost

Management oversight of the Project will be undertaken in accordance with applicable FTA requirements. The FTA has multiple third-party oversight consultants to verify and propose revisions to the work done on the Project. The process is designed to provide assurances that the work being done is consistent with the best practices in the industry and to avoid problems that have affected projects in the past.

Your comment regarding Oahu construction costs is noted. The Project's cost estimate in Chapter 6 reflects local cost factors.

The City will bring in the necessary expertise to manage the construction and later the operation of the Project. Transit-oriented development (TOD) is not part of the Project and, other than the City establishing the appropriate policy foundation, will be primarily implemented by the private sector.

The City has hired qualified companies to support the Project's development. Consultants involved have experience with almost every major rail system development in the country as well as complementary experience in highway development work.

The environmental review of the Project is independent of the electoral process or results.

The public information program is typical for a project of this scope and is required by NEPA. The design of the public involvement program must allow access to information and through multiple meetings and media. This will continue through the construction period and beyond.

The Project schedule accounts for discovery of iwi kupuna and treatment per State Historic Preservation Division regulations. The proper treatment of iwi kupuna has been coordinated with the Oahu Island Burial Council (OIBC) to ensure affected families are contacted and, when necessary, appropriate steps are taken to preserve, protect, or re-inter iwi discovered in the path of the Project. As much as possible, the effort will begin before construction to help address concerns in advance of actual construction. These efforts are memorialized in a Programmatic Agreement between the State Historic Preservation Division and the FTA with extensive participation from OIBC and other interested parties.

The Project's Financial Plan does not rely on private funding of any kind. Planning and zoning around station areas will be conducted by the City's Department of Planning and Permitting under a process covered by the City's new TOD ordinance (ROH 09-4). The TOD process will happen gradually as the opportunities present themselves.

Elderly and ADA service

Discussion of service for elderly and disabled users has been added to Chapter 1 and has been accounted for in the analysis of the Project, including ridership projections. The needs of seniors are not ignored, but commuters are still by far a significantly larger portion of the population according to the latest Census and are expected to be through 2030.

The transit system will comply with Americans with Disabilities Act regulations. Elevators and escalators will be provided at all stations. Also, level boarding will be provided to trains; therefore, stairs or lifts, as used on buses, will not be required. The Project offers seniors another option not currently available to them.

TheHandi-Van services are not directly impacted by the physical construction of the fixed guideway system. TheHandi-Van is a curb-to-curb operation not requiring posted bus stops to board and alight passengers. TheHandi-Van vehicles are able to access businesses, medical facilities, and other destinations using driveways and parking lots since TheHandi-Van has flexibility in selecting a route to a destination. TheHandi-Van services may experience some delays in service during construction in certain areas due to general traffic conditions. TheHandi-Van will be impacted no more than general purpose traffic. A Maintenance of Traffic (MOT) Plan will be prepared for each segment of fixed guideway construction. The MOT Plan documents traffic conditions and operations during the construction of the fixed guideway and identifies lane closures and other traffic detours due to the project construction. A part of this process is identification of required transit modifications during construction. Any impacts to TheHandi-Van operations due to access limitations will be identified and mitigated as appropriate.

Transit bus services

Figure 3-1 of the Final EIS offers the primary explanation why the transit ridership achieved in 1984 has not been surpassed even though the bus fleet has increased. Due to increasing traffic congestion, bus operating speeds deteriorated between 1984 and 1992. During this period, no other comparably sized bus system in the United States moved more riders per bus hour than the Honolulu service. This is according to annual reports filed by the transit operators with the Federal government.

Buses were added in Honolulu to maintain service levels. In 1989, there were 475 buses available for service as reported in The State of Hawaii Data Book 2000. The number of available buses increased to 495 in 1993 and 525 in 1995. In 2007, the total number of available buses was 531. However, increasing congestion required more buses to provide the same level of service along the same route because the total trip time for one bus to serve the entire route was increasing. For example, Figure 1-11 of the Final EIS shows how afternoon scheduled trip times for selected routes have increased from 1992 to 2008 (Source: TheBus public timetables). The time for Route 52 (Circle Isle) to complete a trip has increased over 30 minutes, and the trip time for Ewa Beach has increased almost 60 minutes. The result has been that a bus can no longer make as many trips as it did in the past. This has required the need to add buses to routes to maintain the same interval between buses.

Over the past 10 years, the system operating speed has continued to decline. Even though the annual number of miles operated in revenue service has increased 11 percent from 1997 to 2007 per the National Transit Database, it took a 16 percent increase in the annual number of hours to operate those additional miles. This has contributed to higher operating costs.

Careful examination of Figure 3-1 of the Final EIS depicts two times when bus operating speeds slightly and temporarily increased. Both of these occasions were the result of concerted efforts to enact systematic and comprehensive improvements to TheBus system. The most recent of these was from 1999 to 2001. New service design substantially improved bus services in the Ewa and Waianae areas with the introduction of a wide array of new community circulators, local, and CountryExpress! bus routes.

The benefits of these improvements have been temporary. Increasing system usage and traffic congestion have combined to negatively impact the overall system operating speed as shown in Figure 3-1 of the Final EIS.

Since the early 1990s, the number of TheBus trips to and from Waikiki has decreased from over 1,050 trips to 994 trips today. For example, Route 8 had 189 trips to and from Waikiki in 1992; today the route has 143 trips. Similarly, Route 19 has experienced a decrease in trips to and from Waikiki from 125 to 71 trips today. The number of trips on Route 20 has decreased from 78 to 39 trips.

Figure 1-2 of the Draft EIS presents population, vehicle ownership, and vehicle miles trends for Oahu. The significant relationship in this graphic is the disproportionate increase in

vehicle miles traveled compared to population and vehicle registrations. The consequence of the increase in vehicle miles traveled is congestion, causing slower operating speeds for all vehicles, including transit. This impact is depicted in Figure 3-1 of the Final EIS.

The fleet size has not stagnated. However, to operate the same number of miles of service in 2007 at 13.2 miles per hour requires about 50 more buses than in 1984 when the operating speed was 14.7 miles per hour.

The purpose of Figures 1-5 and 1-6 of the Final EIS is to show population and employment distribution and growth for Oahu. Appendix D of the Final EIS includes existing and future bus routes, including route numbers and frequencies.

Figure 1-6 of the Final EIS shows employment distribution and growth for Oahu. Figure 3-1 shows the performance of TheBus over time in terms of average travel speed. Section 3.3.2 of the Final EIS also shows information related to reliability in terms of schedule adherence and "turnbacks" (when a bus does not complete its route to be able to maintain schedule on the next trip). As noted above, Appendix D of the Final EIS includes information on both existing and future bus routes, including frequencies.

The Project is designed with 240-foot station platforms that can accommodate trains with up to four 60-foot cars. Each car can hold over 160 passengers, so a four-car train can carry more than 600 passengers. The train control system is being designed to accommodate 90-second headway service, or 40 trains per hour. Forty 4-car trains in an hour could accommodate at least 24,000 passengers per hour per direction. This demand is larger than is forecast to occur in 2030. 2030 peak hour demand for the Project is expected to be about 8,100 passengers per hour in the peak direction. This demand can be accommodated by operating 3-minute headway service with a mixture of two-car and three-car trains. A fleet of approximately 150 vehicles to accommodate this demand is budgeted for purchase as part of the Project. However, as noted above, more than three times as many passengers per hour can be accommodated at some future date merely by expanding the fleet size.

The taxes used to fund the Project will provide a system that will serve the vast majority (70 percent) of the population and employment within the corridor. It also furthers the policy guidance of the City Council regarding alternatives modes and support of the development of Kapolei as Oahu's "second city." The capacity of the proposed system is sufficient to accommodate very large increases in demand over time. While the present design identifies approximately 8,000 passengers in the peak hour peak direction and provides the vehicles to handle that demand, the system can handle over 50,000 people an hour by adding cars to each train and reducing the time between trains.

Maintenance

The Project's financial plan includes long-term maintenance costs, which are discussed in Section 6.4 of the Final EIS. Since deferred maintenance is not a desirable practice, it is not assumed as part of the financial analysis in the Final EIS.

As shown in Table 2-4 of the Honolulu High-Capacity Transit Corridor Project Travel Forecasting Results Report, 2030 a.m. peak-period travel times by transit will be less than by auto for many trips in the corridor. While travel will be faster than many trips by car, one significant advantage of the Project is that it offers reliability that cannot be guaranteed by any other travel mode available. The time from one end of the line to the other will be 42 minutes regardless of conditions on the highway, weather, or any other impediment. In effect, this means that during many days, trips on the Project will be shorter than by any other mode.

The FTA and DTS appreciate your interest in the Project. The Final EIS has been issued in conjunction with the distribution of this letter. You may view the Final EIS on the Project website at www.honolulutransit.org. You may request a DVD of the Final EIS and additional content through the "Contact Us" tab on the website or by calling the Project hotline at 566-2299. 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