DEPARTMENT OF TRANSPORTATION SERVICES

MUFI HANNEMANN
MAYOR

CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, 3RD FLOOR
HONOLULU, HAWAII 96813
Phone: (808) 768-8305 • Fax: (808) 768-4730 • Internet: www.honolulu.gov

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

May 21, 2010 RT10/09-298709R

Ms. Daisy Murai
3039 Kaunaoa Street
Honolulu, Hawaii 96815

Dear Ms. Murai:

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:

The Draft EIS describes the entire proposed action of construction and operation of a fixed guideway transit system between logical termini in East Kapolei and Ala Moana Center. Since selection of a First Project by City Council Resolution 07-039, project information has detailed the limits of the Project and illustrated other areas that were included in the Long-Range Plan as future or planned extensions. The Project has logical termini at East Kapolei and Ala Moana Center and independent utility from any extensions that may be constructed in the future. The proposed future extensions to West Kapolei, Salt Lake Boulevard, Waikiki, and UH Manoa

are discussed in the cumulative impacts sections of Chapters 3 and 4 of the Final EIS. Future extensions may have additional stops in Waikiki or the Diamond Head area. The future extensions are not part of this Project; thus, they are not required to be evaluated under Chapter 343 of the Hawaii Revised Statutes and NEPA. Under NEPA, environmental analysis is only required when there is a proposed action by a Federal agency. Because the future extensions are not proposed for implementation at this time, they are not part of the Project studied in this Final EIS. If the future extensions are proposed for implementation in the future, environmental analysis of the extensions and appropriate alternatives will be undertaken at that time.

Section 6.3 of the Final EIS describes the financial resources anticipated to be needed to pay for the capital costs of the Project. Capital costs of the Project, including finance charges, are expected to be fully paid for by a combination of FTA Section 5309 New Starts and FTA Section 5307 Funds from the Federal government and revenue from the County General Excise and Use (GET) Tax surcharge levied from 2007 through 2022 on Oahu.

As discussed in Section 4.18.11 of the Draft EIS, a Programmatic Agreement (PA) has been developed in consultation with the State Historic Preservation Division (SHPD), the Advisory Council on Historic Preservation, Native Hawaiian organizations, and other stakeholders to address management of inadvertent archaeological, cultural, or historic finds during construction.

During the archaeological sampling, iwi kupuna (Native Hawaiian burials) will be identified and managed in compliance with applicable laws. This will include consultation with project proponents, the Oahu Island Burial Council, SHPD, and recognized lineal and/or cultural descendants to develop burial treatment plans. Although the goal of the archaeological sampling will be to identify all burials and treat them appropriately prior to the start of construction in a particular area, the possibility exists that additional previously undiscovered burials will be encountered during construction. In addition, protection zones would be created around resources that are identified prior to construction. The PA outlines the treatment of burials discovered during construction.

Travel times with the fixed guideway system will be faster than bus travel. The rail station is immediately adjacent to the bus terminal at Ala Moana Center. Trip time via fixed guideway from Ala Moana Center to Downtown would only take four minutes (as shown in Table 3-16 in the Final EIS. There will be a mezzanine level at the Downtown Station, thus allowing an individual to access Aloha Tower without crossing Nimitz Highway at street level. Traffic congestion on roadways is expected to worsen by 2030 and this will cause an increase in bus or car trip times. In addition, all fixed guideway stations will be equipped with escalators and elevators.

The dwell time at each station will be approximately 30 seconds. This is sufficient time for passengers, even those using wheelchairs, to enter or exit the vehicle. Because of the smooth automated train operation, driver securement will not be required for wheelchairs. Bicycles will be allowed on the system as regulated by a bicycle policy.

The station platforms will be of similar height to the third or fourth floor of buildings. Individuals who are uncomfortable above ground level may choose to take local bus transit that avoids elevated freeway sections. Projections of future transit users consider projected demographics for Oahu in 2030.

The Hawaii Department of Transportation (HDOT) is a cooperating agency on the Project. There is continuous coordination between DTS and HDOT. Easement agreements and permits to use State right-of-way can only be finalized after acceptance of the Final EIS.

Under the No Build and Build Alternatives, the travel forecasting model has assumed several transportation projects, including congestion-relief items for Oahu streets and highways, would be in place in 2030. These projects are detailed in Table 2-4 of the Final EIS and include the p.m. zipper lane and widening of the H-1 Freeway. As identified in Table 3-14 of the Final EIS, the Project will reduce vehicle delay by 18 percent compared to the No Build Alternative. This reduction in delay is attributable to shifts in travel demand from automobile to transit.

1) In Chapter 2 of the Alternatives Analysis Report (DTS 2006b) and Chapter 2 of the Final EIS, two options were considered for the Managed Lane Alternative (Two-direction Option and Reversible Option). This alternative would have provided a two-lane elevated toll facility between Waipahu and Downtown Honolulu, with variable pricing strategies to maintain free-flow speeds for transit and high-occupancy vehicles (HOVs). The Two-direction Option would have served express buses operating in both directions during the entire day. To maintain free-flow speeds in the Two-direction Option, it may be necessary to charge tolls to manage the number of HOVs using the facility. For the Reversible Option, three-person HOVs would be allowed to use the facility for free, while single-occupant and two-person HOVs would have to pay a toll. The Reversible Option was found to be optimal.

The findings are summarized in Chapter 2 of the Final EIS as follows: "The Managed Lane Alternative was evaluated for its ability to meet project goals and objectives related to mobility and accessibility, supporting planned growth and economic development, constructability and cost, community and environmental quality, and planning consistency. Transit reliability would not have been improved except for express bus service operation in the managed lanes. While this alternative would have reduced congestion on parallel highways, system-wide traffic congestion would have been similar to the No Build Alternative as a result of increased traffic on arterials trying to access the facility. Total islandwide vehicle hours of delay would have increased with the Managed Lane Alternative compared to the No Build Alternative, indicating an increase in system-wide congestion (Table 2-2, Final EIS)."

The Managed Lane Alternative would not have supported planned concentrated future population and employment growth because it would not provide concentrations of transit service that would serve as a nucleus for transit-oriented development. The Managed Lane Alternative would have provided little transit benefit at a high cost. The cost-per-hour of transit-user benefits for the Managed Lane Alternative would have been two to three times higher than that for the Fixed Guideway Alternative. Similar to the

TSM Alternative, the Managed Lane Alternative would not have substantially improved service or access to transit for transit-dependent communities. No funding sources were identified for the Managed Lane Alternative. Toll revenues from the Managed Lane Alternative would pay for ongoing operating and maintenance while remaining revenues would be used to repay debt incurred to construct the system.

The Managed Lane Alternative would have generated the greatest amount of air pollution, required the greatest amount of energy for transportation use, and would have resulted in the largest number of transportation noise impacts of all the alternatives evaluated. Because the Managed Lane Alternative would have served a shorter portion of the study corridor (approximately 16 miles compared to the 20 miles served by the fixed guideway), it would have resulted in fewer displacements and would have impacted fewer archaeological, cultural, and historic resources than the Fixed Guideway Alternative. The Managed Lane Alternative would not have affected any farmlands. Visually, the elevated structure would have extended a shorter distance, but it would have been more visually intrusive because its elevated structure, with a typical width of between 36 and 46 feet, would have been much wider than the Fixed Guideway Alternative.

After the Alternatives Analysis was completed, several scoping comments were received requesting reconsideration of the Managed Lane Alternative that was considered and rejected during the Alternatives Analysis. Because no new information was provided that would have changed the findings of the Alternatives Analysis regarding the Managed Lane Alternative, it was not included in the Draft EIS for further consideration.

2) The existing bus fleet of 525 buses would be insufficient to handle ridership demand in 2030 without the Project. As stated in Section 3.4.2 of the Final EIS, "Although some increases in bus services would occur under the No Build Alternative, a review of route-specific demand and service levels for 2030 indicates that bus capacity would be exceeded for several routes. In some cases the demand per bus trip would be more than twice the seating capacity. In these instances, passengers would be unable to board the bus."

3) Since trains and rail stations will be electrically powered, the system's infrastructure is being designed to handle service disruptions. For example, trains will draw power from many points along the route, so an outage in a few areas should not disrupt service. If electrical power is lost system-wide, then train brakes are designed to stop the rail cars even without power. Lights will stay on in trains and stations; backup batteries will provide lighting for several hours. The train operations center will communicate with passengers via the public address system and intercom to provide guidance.

If power is restored within a short time, service will resume. With a prolonged outage, the operations center will direct passengers to exit the trains and walk along a lighted emergency walkway on the guideway to the nearest station. For those unable to

exit rail cars, help will be provided by emergency responders and transit staff. Passengers will be met at the train station by a coordinated response from emergency responders and city transportation workers.

As stated previously, the Managed Lane Alternative was examined during the Alternatives Analysis and was found to provide little community benefit, as it would not have resulted in substantially improved transit access in the corridor.

Chapter 2 of the Draft EIS, as well as in Chapter 2 of the Alternative Analysis, show the total capital costs for the Managed Lane Alternative would range between $3.6 and $4.7 billion, of which $2.6 to $3.8 billion would be for construction of the managed lanes. The transit operating costs for the managed lane would range between approximately $251 and $261 million as a result of additional buses that would be put in service under that alternative. These costs do not include the cost of maintaining the managed lane facility. In Chapter 6 of the Final EIS, the capital costs of the Fixed Guideway Alternative, including bus system costs, will be $4.6 billion, including finance charges, in 2009 dollars. Total operating costs for the Fixed Guideway Alternative, including bus, TheHandi-Van, and fixed guideway, will be approximately $298 million in 2009 dollars.

The Fixed Guideway will be more cost-effective over the long-term. As stated in Section 6.3 of the Final EIS, funding sources for the capital investments include FTA Section 5309 New Starts and FTA Section 5307 funds from the Federal government and the GET surcharge. Only the Fixed Guideway Alternative could be funded with the GET surcharge. The GET is expected to generate $3.5 billion through 2022 and the FTA's agreement to consider at least $1.55 billion for Federal contribution to the Project the New Starts program for the Fixed Guideway. No funding sources were identified for the Managed Lane Alternative. Toll revenues from the Managed Lane Alternative would pay for ongoing operating and maintenance while remaining revenues would be used to repay debt incurred to construct the system.

Multiple forms of testimony were supported at each hearing, including a hearing examiner, separate court reporter to take testimony, and comment forms to provide written testimony. Individuals could come to as many or few hearings as desired and testify at each hearing. The public was also able to provide comment via the project website (www.honolulutransit.org), or could provide written comment directly to DTS.

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. 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

Enclosure