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June 1, 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:

Initial Comments

Concern about land acquisition

Land acquisition requirements for the system will be limited because the elevated system will not be interspersed with traffic. The elevated system takes advantage of vertical space over existing roadways eliminating the need to accommodate transit-dedicated space at-grade alongside mixed traffic.

Section 4.4 of the Final EIS addresses Acquisitions, Displacements, and Relocations and Appendix C. Table 4-4 indicates that the project will require 40 full and 159 partial acquisitions. Where acquisition of property will occur, compensation will be provided to affected property owners, businesses or residents in compliance with all applicable Federal and State laws and will follow the Federal Uniform Relocation Assistance and Real Property Acquisition Policies Act.

The guideway will have a maximum track height of approximatley 110 feet and will accommodate only steel-wheeled vehicles.

The discussion of farmland, including that in use by Alun Farms takes place in the Final EIS Section 4.2.3. The analysis concludes that the Project's effect will not be substantial and no mitigation will be required.

Concern about noise mitigation

Final EIS Section 4.10 addresses strategies to mitigate for noise impacts through materials and design, including the use of wheel skirts. With mitigation, the project will not have noise impacts per FTA criteria.

The project will provide transit infrastructure designed to meet the mobility needs of an increasing, and increasingly densely situated population.

Concern about operating in a dense urban environment

Final EIS Section 4.16 addresses impacts and mitigation to Archaeological, Cultural, and Historic Resources. The project is subject to compliance with the National Historic Preservation Act (NHPA) of 1966, as amended (16 USC 470 et seq.). The project will have adverse effects to historic properties; those effects and required mitigation to address them is addressed in the Programmatic Agreement in Appendix H.

Concern about alignment

Chapter 1 of the Final 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 the 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.

Concern about future extensions

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.

Concern about financial resources

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.

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.

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.

Concern about archaeology and management of unmarked graves

Final EIS chapter 4.16 Archaeological, Cultural, and Historic Resources describes the Programmatic Agreement (PA) 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.

The Project may be subject to compliance with the Native American Graves Protection and Repatriation Act (NAGPRA) (25 USC 3001) where it crosses lands controlled or owned by the Federal Government. Any human remains found on lands owned or controlled by the Federal government will be addressed in accordance with NAGPRA and 43 CFR 10—the regulations that define the process and procedures of NAGPRA.

During the archaeological sampling, 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.

Concern about travel times

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, or individuals with strollers, carts, or rolling luggage 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. Section 2.5.1 of the Final EIS Operating Parameters: "Bicycles, luggage, and surfboards will be allowed on trains and regulated by policy to address high demand periods or special conditions."

Concern for those with height phobias

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.

Concern about right of way acquisition

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 Airport Alternative, 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.

In Chapter 2 of the Alternatives Analysis Report (DTS 2006b), which is available online, 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.

Proposal of an Express Way

The proposal for an elevated "EXPRESS Way" has been evaluated prevously as the Mangeld Lane Alternative in the Alternatives Analysis Report. 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.

Proposal to limit future bus fleet size

The proposal to limit the future bus fleet to the size of the existing fleet of 525 buses would result in a fleet that is 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."

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 Final 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.

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.

Concern related to electrical generation and delivery

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.

Final Comments

Tele-working is becoming increasingly acceptable as a work-place alternative. Specific decisions about workforce management would be made by individual employers. It is possible that local and state government could create policy incentives to employers to encourage alternative workplace arrangements to better accommodate a tech-savvy generation of workers.

Comparison with the super ferry project

The NEPA process is a federal requirement only for federally funded projects. If the Super ferry project did not involve a federal agency, then the level of environmental review would have been determined by State and local jurisdictions only.

Testimony at local hearings

In response to your concern that "the City will allow only one testimony per person at any public hearing – even if there might be new information presented after the testimony." Under NEPA, FTA encourages ongoing dialogue with members of the public about its federally funded transit projects. It is possible that in order to provide all participants with an opportunity to speak, the City may suggest time limits for verbal comments. This is not intended to stifle public response; rather it is intended to provide an opportunity for everyone who would like to speak.

Multiple forms of testimony were supported at each hearing, including a hearing examiner, provision of a separate court reporter to record 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.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure