DEPARTMENT OF TRANSPORTATION SERVICES

MUF 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

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May 21, 2010 RT1/09-295335R

Ms. Jamie Story
Grassroot Institute of Hawaii
1314 South King Street, Suite 1163
Honolulu, Hawaii 96814

Dear Ms. Story:

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:

Public transit ridership

Table 3-18 of the Final EIS details the total 2030 weekday transit boardings for the Project at over 450,000. This will be an increase of 80 percent over the 2007 reported weekday transit boardings for the 23-year period. This is a reasonable expectation given the substantially

higher level of service to be provided with the Project. It also tracks with other locations that have implemented rail in critical travel corridors. Portland, OR, for example, experienced an increase in transit ridership of over 90% between 1987 and 2007 after the rail line was built. Overall transit boardings have increased 33% between 1999 and 2009 (TriMet Service and Ridership Information). Valley Metro ridership in Phoenix increased 15% in one year following the opening of the rail line (Valley Metro press release, July 2009)

In addition, national trends show increasing transit ridership. ~~Last year (~~2008~~)~~ recorded the highest demand for public transportation in 52 years (APTA 2008 Ridership Report). It is misleading to use "metro area" public transportation usage data over a time span of many decades since "metro area" has been redefined and enlarged in each census period to include low-density outer areas not served by rail or even bus transit in some cases.

As noted above, ~~In~~ in the 20-year period between 1987 and 2007, ridership grew 95.5 percent for the Tri-Met system in Portland, Oregon, as measured by annual unlinked passenger trips. In that same 20-year period, the transit system in Phoenix experienced 189.4 percent growth in passenger trips; Sacramento experienced 131.9 percent growth and San Diego's growth was 119.6 percent in unlinked passenger trips. Other systems, including those serving Houston, Los Angeles, Boston, New York, and San Francisco, have all experienced varying rates of growth as measured by unlinked passenger trips (APTA 2008 Ridership Report).

Traffic

In analyzing future traffic congestion and the impact of the Project, the key is to understand how bad traffic would be without rail. If all the people using the rail lines in those cities drove, conditions would be dramatically worse. A travel forecasting model was used to determine transit ridership and roadway conditions in 2030 with and without the Project. This model is used by the Oahu Metropolitan Transportation Organization (OahuMPO) for the Oahu Regional Transportation Plan 2030. The model is updated approximately every five years to reflect changes in land use, socio-economic conditions, and transportation network improvements. The model is approved by the OahuMPO Technical Advisory Committee. The OahuMPO model is based on "best practices" for urban travel models in the U.S. The model is consistent with FTA guidelines and required to meet FTA standards to qualify the Project for federal funding under the New Starts program. As stated in Table 3-14 of Chapter 3 of the Final EIS, the travel forecasting model predicts that Honolulu traffic in 2030 will be 18 percent less severe (in terms of delay) with the Project, compared to the No Build Alternative. Rail also provides a reliable, consistent alternative to the uncertainty of highway congestion.

Energy

Your comment correctly identifies the energy consumption use for the various modes of transportation, with rail being the most efficient of the major modes listed, as calculated for data collected for the year 2006. The same report referenced shows that between 1970 and 2006, highway transportation energy consumption has been growing at a rate of 1.8 percent per year.

Comment [TH1]: Please list the locations about which you are speaking. Are they similar in terms of demographics; P&N; alternatives considered? If so, please state the similarities. If they are not similar to this project, the locations should not be used for comparative purposes.

Comment [H2]: There are no directly comparable systems, but we can show the effect of rail in a major corridor.

Comment [TH3]: Mention how transit ridership is projected to increase in Honolulu based on the travel demand model.

Comment [TH4]: Please list the sources for this data.

Comment [TH5]: Are these areas similar in terms of demographics; P&N; alternatives considered? If so, please state the similarities. If they are not similar to this project, the locations should not be used for comparative purposes.

Comment [H6]: No two systems are directly comparable and none compares with what is proposed for Honolulu. The argument presented in the comment is that rail does not contribute to ridership, so this is a fair comparison.

Comment [TH7]: Please list the specific section in Chapter 3.

The assertion that highway transportation energy consumption will stop growing on an annual basis is not supported by data collected over the past 36 years.

Carbon emissions

Future analysis can only consider what is currently regulated. This includes future vehicle mix and available technologies. The analysis does not assume that future technologies will only affect private automobiles and not affect mass transit vehicles.

In addition, the direct comparison of carbon dioxide emissions between automobiles and transit rail cannot be made without knowing the energy sources providing the electricity. The utility (HECO) that will provide electricity for the Project primarily uses fuel oil to generate electricity, but the HECO grid is supplemented with independent power producers that generate electricity through renewable resources. As the percentage of energy produced from renewable resources increases over time, the electrically powered rail system will allow less of the island's transportation system to rely on oil. As noted in Section 4.9.3 of the Final EIS, the Project will result in a daily reduction of 171 metric tons of carbon dioxide when compared to the No Build Alternative. For an at-capacity system, approximately 25 grams of carbon dioxide are emitted per passenger mile. Approximately 150 grams of carbon dioxide are ~~consumed~~ produced per 1/50th of a gallon of gasoline consumed.

As noted in Section 4.11.1 of the Final EIS, an average rail vehicle consumes 62,700 BTUs per vehicle mile of service. A single vehicle has a capacity of approximately 160 passengers. Therefore, approximately 390 BTUs are consumed per passenger mile at capacity. Consumption of 1/50th of a gallon of gasoline consumes 2,500 BTUs.

Cost-effectiveness

The cost of the Project is $5.5 billion in ~~inflated~~ year of expenditure dollars. The cost-effectiveness index (CEI) calculation defined by FTA under the New Starts program requires that a project show that the CEI is less than a $23.99 per new rider threshold to qualify for federal funding. The Project CEI is $16.24, well below the threshold. Comments about the costs and effectiveness of HOT lanes are not consistent with the findings in the Alternatives Analysis. The Alternatives Analysis showed that the cost of the Managed Lane facility would have been at least $2.6 billion in 2006 dollars and the benefits in terms of reducing congestion would have been only slightly better than the No Build Alternative and substantially worse than the Fixed Guideway alternative.

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,

Comment [TH8]: What is the significance of this statement as it applies to the project? Please expand.

Comment [TH9]: I'm not sure I follow how *x* number of grams of carbon dioxide *emitted* is related to *x* number of grams of carbon dioxide *consumed*. These two sentences would make more sense if the second sentence focused on the number of grams of carbon dioxide *emitted* per 1/50th of a gallon of gasoline consumed.

Comment [TH10]: Inflated to what year? Please specify.

Comment [TH11]: Are these two thresholds per person? Please indicate.

Comment [TH12]: Is this amount in 2009 dollars or inflated dollars? If inflated dollars, for what year?

WAYNE Y. YOSHIOKA
Director

Enclosure