DEPARTMENT OF TRANSPORTATION SERVICES

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May 21, 2010 RT2/09-299111R

Mr. John Brizdle
3001 Lai Road
Honolulu, Hawaii 96816

Dear Mr. Brizdle:

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:

*Contrary to the statements in the comment, a series of steps were taken to develop an un-biased evaluation of the Managed Lane Alternative for the Alternatives Analysis. Alternative development included discussions within the consultant team and with experts in the design and development of managed lane systems in other areas of the country, and input from a citizen group interested in managed lanes. The process of alternatives screening and selection is discussed in Sections 2.2.2, 8.6.1, and 8.6.12 of the Final EIS.*

**Comment [k1]:** Address the claims regarding the drawing from the citizen group website, the one exit near town statement, and the relationship between managed lanes and traffic jams. Cite CEQ Regulation 1502.14 which states "agencies shall Rigorously explore and objectively evaluate all reasonable alternatives, and for alternatives which were eliminated from detailed study, briefly discuss the reasons for their having been eliminated and devote substantial treatment to each alternative considered in detail including the proposed action so that reviewers may evaluate their comparative merits."

**Comment [k2]:** Address claims about the mayor and contractor bias. CEQ Regulation 1506.5 (c) states that "Contractors shall execute a disclosure statement prepared by the lead agency, or where appropriate the cooperating agency, specifying that they have no financial or other interest in the outcome of the project." Address claims that contractors did not derive a Managed Lane alternative of their own design in an explanation of the overall process for identifying alternatives.

**Comment [k3]:** Regs don't just refer to financial but "any interest in outcome". Bias allegations need to be more expressly addressed.

**Comment [s4]:** The claim of bias is not financial. 1506.5 is not applicable. The citizen group input was considered.

**Comment [k5]:** Give a brief summary of the general process for alt screening.

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As required in 23 CFR 771.111(i), which states "[f]or projects requiring EISs, an early opportunity for public involvement in defining the purpose and need for action and the range of alternatives must be provided, and a public hearing will be held during the circulation period of the draft EIS. For other projects that substantially affect the community or its public transportation service, an adequate opportunity for public review and comment must be provided". Public input was requested in December 2005 regarding managed lane alternatives proposed for evaluation in the Alternatives Analysis.

*The initial screening of alternatives is documented in the Honolulu High-Capacity Transit Corridor Project Alternatives Screening Memorandum (DTS 2006a) (Screening Memorandum). The subsequent FTA Alternatives Analysis process is provided in the Honolulu High-Capacity Transit Corridor Project Alternatives Analysis Report (DTS 2006b).*

*The initial screening process considered a wide range of alternatives, including "construction of a 'managed' two-lane elevated structure for transit vehicles and potentially carpools, as well as single occupant vehicles willing to pay a congestion-based toll," as described on page S-2 of the Screening Memorandum. The screening results for the Managed Lane Alternative are discussed on pages C-4 and C-5 of the Screening Memorandum.*

*This initial screening process identified four alternatives that were presented at scoping meetings held to obtain public input. As described on page 5-2 of the Screening Memorandum, one of the alternatives recommended for further evaluation was the Managed Lane Alternative.*

*The Managed Lane Alternative originally was described as follows:*

*The Managed Lanes Alternative would include construction of a two-lane grade-separated facility between Waiawa Interchange and Iwilei for use by buses, para-transit vehicles, and vanpool vehicles (see Figure 5-1). The lanes would be managed to maintain free-flow speeds for buses, while simultaneously allowing High-Occupancy Vehicles (HOVs) and variable pricing for toll-paying single-occupant vehicles. Intermediate bus access points would be provided in the vicinity of Aloha Stadium and Middle Street. Bus operations utilizing the managed lanes would be restructured to use the Managed Lane and enhanced to provide additional service between Kapolei and other points Ewa of Downtown, through to the University of Hawaii at Manoa.*

*Public comments received during the scoping process resulted in the revision of this proposed alternative. As discussed on Page 6-1 of the Screening Memorandum:*

*Based on scoping comments, a second operational option was included under the Managed Lane Alternative. The initial option proposed a two-lane grade-separated facility between Waiawa Interchange and Iwilei which would operate as one lane in each direction at all times of the day. The second option proposes similar infrastructure, but it would operate as a reversible facility with two lanes traveling Koko Head during the morning peak period, and then reversing to travel Ewa in the PM peak period. Both operational options would include restructured and enhanced bus operations by utilizing the managed lanes to provide additional*

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*service between Kapolei and other points Ewa of Downtown, and both would be managed to maintain free-flow speeds for buses. Provided enough capacity exists, High-Occupancy Vehicles (HOVs) and toll-paying single-occupant vehicles would also be allowed to use the facility under either scenario; however, it is possible that under the initial option (one lane in each direction), there would not be enough excess capacity to allow toll-paying single occupant vehicles and still maintain reasonable speeds. Intermediate access points would be provided in the vicinity of Aloha Stadium and the Keehi Interchange.*

*This alternative was further developed in the Alternatives Analysis Report, with additional features added to maximize the performance of the alternative, as discussed on Page 2-4:*

*The Two-direction Option would serve express buses operating in both directions during the entire day. The Reversible Option would serve peak-direction bus service, while reverse-direction service would use H-1. Twenty-nine bus routes, with approximately 93 buses per hour, would use the managed lane facility during peak hours for either option. One limited-stop route and one local route would continually operate in the managed lane. A total of 27 peak-period express routes would operate in the peak direction using the managed lane facility. Of these, three are new express routes serving developing areas and nine are new routes developed for exclusive use of the managed lane. The nine new managed lane express bus system routes originate from Kalaeloa, Kapolei, or Central Oahu and terminate at the Alapai Transit Center, Waikiki, or UH Manoa. Other peak-period, local and limited-stop routes follow a route similar to the current structure but will use the managed lane for the line-haul portion of the route.*

*A toll structure was developed that would ensure that the managed lane facility would operate to maintain free-flow speeds for buses. To maintain free-flow speeds in the Two-direction Option, it would have been necessary to charge tolls to manage the number of HOVs using the facility. For the Reversible Option, three-person HOVs would have been allowed to use the facility for free, while single-occupant and two-person HOVs would have had to pay a toll. Both options were evaluated in detail in the Alternatives Analysis Report.*

As detailed in Section 2.2.2 of the Final EIS, the Managed Lane Alternative was rejected because it would have performed poorly in meeting the purpose and need for the project, would not have been financially feasible, and would not have resulted in substantially fewer environmental impacts.

FTA/FHWA regulations on Environmental Impact and Related Procedures (23 U.S.C.771.05 (b)) states that "Alternative courses of action be evaluated and decisions be made in the best overall public interest based upon a balanced consideration of the need for safe and efficient transportation; of the social, economic, and environmental impacts of the proposed transportation improvement; and of national, State, and local environmental protection goals."

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

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**Comment [k6]:** Why? This explanation is essential to responding to the comment.

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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.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure