Submission 543
Salutations

Subject: Honolulu High-Capacity Transit Corridor Project

Dear: _____

The U.S. Department of Transportation Federal Transit Administration (FTA) and 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* in November 2008. This letter, which is being distributed in conjunction with the Final EIS, 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 (the Project) as the preferred alternative and is the focus of this document. 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 in this Final EIS. The selection is described in Chapter 2 in this Final EIS. It also includes additional information and analyses, and minor Project revisions that were made to address comments from agencies and the public on the Draft EIS. The following paragraphs address comments received in your letter dated February 9, 2009.

The headings in the responses are taken directly from the comment letter to help locate the responses.

Comment: Public transit ridership will increase with the addition of rail transit

The Final EIS in Table 3-19 details the total 2030 weekday transit boardings for the Airport Alternative at over 450,000. This will be an increase of 80% over the 2007 reported weekday transit boardings for the 23 year period. This is a reasonable expectation based on the given the substantially higher level of service to be provided. It also tracks with other locations that have implemented rail in critical travel corridors.

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.

In the 20-year period between 1987 and 2007, ridership grew 95.5% 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% growth in passenger trips; Sacramento experienced 131.9% growth and San Diego's growth was 119.6% 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.

Comment: Rail systems in cities such as Vancouver, Salt Lake City, Portland, and Washington, D.C. have been vital in reducing 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 O'ahu Metropolitan Transportation Organization (O'ahuMPO) for the O'ahu Regional Transportation Plan 2030. The O'ahuMPO 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 Chapter 3 of the Final EIS, the travel forecasting model predicts that Honolulu traffic in 2030 will be 18% less severe (in terms of delay) with the rail project, compared to the No Build Alternative. Rail also provides a reliable, consistent alternative to the uncertainty of highway congestion.

Comment: Rail uses less energy than automobiles or other commute options

The 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. 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.

Comment: Rail reduces 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.

Comment: A 6.5 billion train is cost-effective

The cost of the Project is $5 billion in inflated 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 threshold to qualify for federal funding. The Project CEI is $15.96, well below the threshold. Comments about the costs and effectiveness of HOT lanes are not consistent with the findings in the Alternatives Analysis. The AA showed that the cost of the Managed Lane facility would have been at least $2.6 billion 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 has been issued in conjunction with the distribution of this letter. Issuance of the Record of Decision under the National Environmental Policy Act and acceptance in this Final EIS by the Governor of the State of Hawai'i are the next anticipated actions, and will conclude the environmental review process for the Project.

Very truly yours,

WAYNE Y. YOSHIOKA
Director