

December 20, 2011.

Mr. Leslie Rogers Administrator, FTA Region IX 201 Mission Street, Suite 1650 San Francisco, CA 94105 by email: Leslie.Rogers@fta.dot.gov

Mr. Rogers:

We would like to bring to your attention that the opening of the Honolulu rail project would result in a deterioration of public transportation service for residents of the Kapolei area and its surrounds.

For example, the Country Express Bus C presently offers a superior service for Kapolei commuters to Downtown Honolulu than what the Rail Project promises if it opens to East Kapolei and even if fully extended to the Kapolei Transit Center.

A Country Express Bus 'C' leaves the Kapolei Transit Center every half-hour going to Downtown and further. The scheduled time during the rush hour varies from 38 to 52 minutes to Downtown depending on time of day. It uses the zipper lane and since car entry into the zipper lanes requires 3+ occupants the zipper lane is nearly empty even during rush hour. We have discussed the C bus service with commuters who currently use it and they find the service generally on time and reliable.

The city projects that rail would take 38 minutes from East Kapolei to Downtown. iii Kapolei commuters would have to drive to the East Kapolei rail station park-and-ride lot on North-South Road, which would take 12 minutes or more from Kapolei proper, which is six miles away. That would mean a total of 50 minutes, plus the average ½-mile to walk from the park-and-ride lot to the rail station, which would take 6 minutes at 2.5 mph, for a total of 56 minutes. iv

If the planned extension of rail to the Kapolei Transit Center were built that would improve service. The distance from the Kapolei Transit Center is 6.2 miles as may be seen from the map. The city's only counter that we have heard so far is that the zipper lane would be crowded by 2030 and thus slow buses down. This is not credible; the zipper lane is currently empty with the 3+ requirement. If it were ever to become full during rush hour the policy could be changed to 4+ or even a busonly policy. There would never be enough buses that could congest the zipper lane.

Since the train travels at 28 mph average it is likely to take longer from Kapolei Transit Center to East Kapolei by train than it would by car, say an additional one minute, or 51 minutes by train from Kapolei Transit Center to Downtown. However, the six minute walk from the parking lot would no longer be necessary.

This superiority of the express buses using the zipper lanes does not take into account future extensions of the zipper lanes, the establishment of in-town pull outs, signal pre-emption for BRT buses, and other improvements such as the presently non-existent marketing. However, the city plans to discontinue the C Bus should the rail line open. vi

Summary: The FTA is presently contemplating approving a service that would:

- On average take longer for Kapolei residents to get to Downtown than they presently can by the Country Express C Bus, which takes 38 to 52 minutes versus 56 minutes by rail though we grant that would be a reliable 56 minutes.
- Eliminate the Country Express C bus entirely, leaving residents no choice but to take the slower train. Given that standing capacity for buses is 55 percent of passengers while rail is 80 percent, it means both a slower and more uncomfortable ride with the train. vii
- When extended to Kapolei proper, the train would eliminate the long walk at the East Kapolei station but in the aggregate still save no time for Express Bus users.

We do not understand why the FTA did not give the Country Express Bus and other express bus services detailed inclusion in the environmental process, especially since a) FTA fully covered these BRT services in its 2006 evaluation of Honolulu BRT, viii and b) Parsons Brinckerhoff planned Mayor Harris' Regional BRT project. ix

Why is FTA approving an extremely expensive and thoroughly ugly elevated rail line while at the same time degrading the existing public transportation service?

Sincerely,

HONOLULUTRAFFIC.COM

Cliff Slater, Chair

cc: Mr. James Barr Environmental Protection Specialist FTA Office of Planning and Environment by email: James.Barr@dot.gov

Endnotes:

i http://www.thebus.org/Route/Timetables/RtC.pdf Allow that to Downtown bus takes two minutes less than the Kapi 'olani/South stop. The Zipper Lane runs one way into the Downtown at the moment. The Hawai 'i DOT plans to install a similar one in the reverse direction in the near future.

Exhibit 6: H-1 Freeway Zipper Lane Location

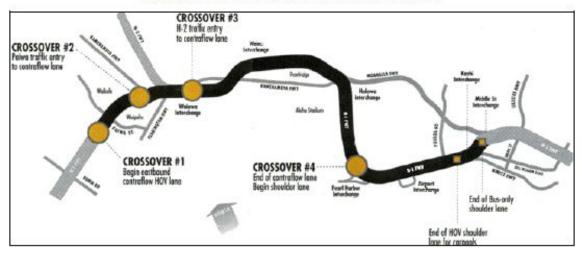
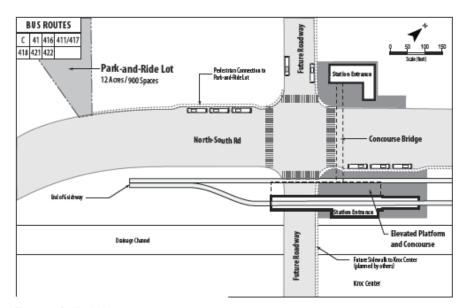
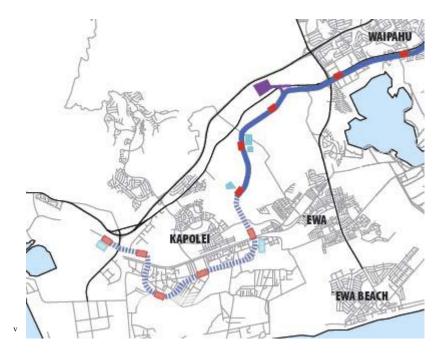


Table 3-16 Fixed Guideway Station-to-Station Travel Times—2030

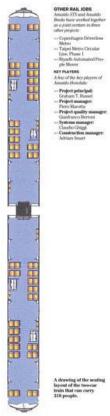
| Form Shading | To Short on | Travel Time Between Stations (in minutes, |
|--|------------------|---|
| From Station | To Station | including dwell time) |
| East Kapolei | UH West Oʻahu | 2 |
| UH West Oʻahu | Ho`opili | 4 |
| Ho`opili | West Loch | 2 |
| West Loch | Waipahu TC | 3 |
| Waipahu TC | Leeward CC | 2 |
| Leeward CC | Pearl Highlands | 1 |
| Pearl Highlands | Pearlridge | 4 |
| Pearlridge | Aloha Stadium | 3 |
| Aloha Stadium | Pearl Harbor NB | 2 |
| Pearl Harbor NB | Airport | 3 |
| Airport | Lagoon Drive | 2 |
| Lagoon Drive | Middle Street TC | 2 |
| Middle Street TC | Kalihi | 2 |
| Kalihi | Kapālama | 2 |
| Kapālama | lwilei | 2 |
| lwilei | Chinatown | 1 |
| Chinatown | Downtown | 1 |
| Downtown | Civic Center | 1 |
| Civic Center | Kaka'ako | 1 |
| Kaka'ako | Ala Moana | 2 |
| Total Travel Time | | 42 |
| CC = Community College TC = Transit Center NB = Naval Base | | |



iv Figure 2-17 East Kapolei Station



vi "Express bus service to Downtown from Kapolei, Waipahu, etc. will continue to operate until the Downtown Station opens." (FEIS, 3-73).



vii

viii Honolulu Bus Rapid Transit (BRT) Project Evaluation Final Report. FTA. June 2006. http://www.nbrti.org/media/evaluations/Honolulu_BRT_Final_Report.pdf

http://www.honolulutraffic.com/feis Vol 1 complete.pdf